

FinSA Client Information

Based on the legal requirements of Art. 8 et seq. of the Financial Services Act (FinSA), the following provides an overview of Entrepreneur Partners AG (hereinafter the «Financial Institution») and its services.

A. Company information

Adress

Entrepreneur Partners AG
Seestrasse 356
8038 Zurich
Phone: +41 (0)44 488 40 10
E-Mail: info@enpa.ch
Website: www.enpa.ch

The Financial Institution was founded in 2008.

Supervisory Authority and Audit Firm

The Financial Institution has been licensed as a manager of collective assets since 2013 and is therefore subject to prudential supervision by the Swiss Financial Market Supervisory Authority FINMA. As part of this supervision, the Financial Institution is audited and reviewed annually by the auditing company BDO, both in terms of supervisory law and obligations. The address of FINMA and BDO can be found below.

Federal Financial Market Supervisory Authority FINMA
Laupenstrasse 27
3003 Bern
Phone: +41 31 327 91 00
E-Mail: info@finma.ch
Website: www.finma.ch

BDO AG
Schiffbaustrasse 2
8031 Zurich
Phone: +41 44 444 35 55
E-Mail: info@bdo.ch
Website: www.bdo.ch

Ombudsman

The Financial Institution is affiliated with the independent ombudsman's office FINOS, which is recognised by the Federal Department of Finance. Disputes about legal claims between clients and the Financial Institution should, if possible, be settled by the ombudsman's office within the framework of a mediation procedure. The address of FINOS is as follows.

Swiss Finance Ombudsman (FINOS)
Talstrasse 20
8001 Zurich
Phone: +41 44 552 08 00
E-Mail: info@finos.ch
Website: www.finos.ch

B. Information on the offered financial services

The Financial Institution provides asset management services and transaction-based investment advisory services as well as Execution only services to its clients. In the case of a transaction-based investment advisory mandate with the Financial Institution, a personal recommendation relating to individual financial instruments is given to the client. The decision to buy or sell always ultimately remains with the client.

The Financial Institution also provides financial services in the area of collective investment schemes. For information on the various collective investment schemes, the general risks, characteristics and modes of operation, please refer to the relevant prospectuses and factsheets on this website.

The Financial Institution guarantees neither a return nor a success within the scope of the investment activity. The investment activity may therefore lead to an increase in value but also to a loss in value.

The Financial Institution has all the necessary licences to perform the services described above.

C. Client segmentation

Financial service providers must assign their clients to a legally defined client segment. The Financial Services Act provides for the segments «private clients», «professional clients» and «institutional clients». For each client, a client classification is determined within the framework of the cooperation with the Financial Institution. Subject to compliance with certain conditions, the client can change the client classification by so-called opting-in or opting-out.

D. Information on risks and costs

General risks associated with financial instruments transactions

The investment advisory and asset management services involve financial risks. The Financial Institution shall inform the client about risks and refer to the brochure «Risks Involved in Trading Financial Instruments» of the Swiss Bankers Association. This brochure can be viewed at www.swissbanking.ch.

Clients of the Financial Institution can contact their client advisor at any time if they have any further questions.

Risks associated with the offered services

For a presentation of the various risks that may arise from the investment strategy for the client's assets, reference is made to the corresponding investment advisory or asset management contracts.

If unusual concentrations of risk within the client portfolio cannot be ruled out, the nature and extent of such concentration risks shall be disclosed to the client. Indicators of such unusual concentrations of risk are:

- a concentration of 10% or more in individual securities;
- a concentration of 20% or more in individual issuers.

Concentrations from collective investment schemes that are subject to regulatory risk diversification rules, such as UCITS funds and Swiss securities funds, are excluded.

When providing investment advice, the Financial Institution shall provide its private clients with the basic information sheet of the recommended financial instrument. Delivery is equivalent to electronic delivery (e.g. e-mail).

Information on costs

A fee is charged for the services rendered, which is normally calculated on the assets under management and/or on a performance basis. For more detailed information, please refer to the relevant investment advisory or asset management contracts.

E. Information about relationship with Third Parties

In connection with the financial services offered by the Financial Institution, economic ties may exist with third parties. The acceptance of payments from third parties and their treatment are regulated in detail and comprehensively in the respective investment advisory and asset management contracts.

If it is not possible to determine the actual amount of remuneration or third-party services before the financial service is provided or the contract is concluded, the financial institution shall inform the client of the range of the respective remunerations, taking into account the different asset classes and financial instruments.

In the case of asset management and portfolio-based investment advice, if the exact amount of third-party remuneration cannot be determined in advance, the client shall be informed of the range of the expected remuneration in relation to the portfolio value and the agreed investment strategy.

F. Information on the market offer considered

The Financial Institution basically pursues an «open universe approach» and tries to make the best possible choice for the client when selecting financial instruments. The Financial Institution's own collective capital investments can - where appropriate - be used in the asset management mandates or recommended within the scope of investment advice.

If the financial institution offers both its own and third-party financial instruments in its market offering, it shall take appropriate organisational measures, such as implementing a procedure for selecting financial instruments based on objective criteria customary in the industry. If the possibility of customers being disadvantaged cannot be excluded, the financial institution shall disclose this to its customers.

The asset manager does not invest in contracts for difference (CFD) and does not engage in securities lending. However, it is not excluded that the custodian bank may enter into a separate agreement with the client regarding securities lending. In this case, the responsibility (including risk disclosure) lies with the custodian bank.

G. Appropriateness and suitability

Appropriateness test for transaction-based investment advice

In the case of transaction-based investment advice, the financial institution provides investment advice for individual transactions without taking into account the entire client portfolio.

In this case, the financial institution must ascertain the client's knowledge and experience before recommending financial instruments. In addition, before recommending financial instruments, it must be determined whether they are appropriate for the client.

In particular, the company must ensure that it is aware of the client's knowledge and experience in relation to each relevant investment category used in the financial service.

Suitability test for asset management

When providing asset management services, the financial institution must also take into account the entirety of the client portfolio it manages. In contrast to investment advice, it also makes the investment decision itself.

In both these cases, the financial institution must determine the financial circumstances and investment objectives as well as the knowledge and experience of the clients. In this context, the knowledge and experience relates to the financial service and not to the individual transactions.

The information gathered by the financial institution about the knowledge and experience of the clients must take account of the investment strategy, and the granularity of the survey must be adapted to the complexity and risk profile of the investment and the investment strategy. In particular, the financial institution must be certain about the knowledge and experience of the clients in relation to each relevant investment category used in the financial service.