

## The Financial Services Act (FinSA) Information for clients

### What does FinSA regulate and when are you affected?

The Swiss Financial Services Act (FinSA) entered into force on 1 January 2020. The primary purpose of FinSA is to strengthen investor protection through increased information and documentation requirements for the provision of financial services. You are affected by FinSA if you receive financial services (e.g. discretionary and non-discretionary investment mandates).

The scope of investor protection depends on the classification of clients into retail clients, professional clients and institutional clients. Unless Vontobel Swiss Financial Advisers AG ("Vontobel SFA") notifies you otherwise, you will be classified as a retail client, giving you the highest level of investor protection.

If you wish to be classified in another client segment, please contact your Wealth Management Consultant ("WMC"). Most information and documentation requirements of FinSA were met by Vontobel SFA through our financial services framework already before the entering into force of FinSA. An overview of the required information can be found below.

#### 1. Information about Vontobel SFA and its supervisory authority

Vontobel SFA holds a license as a securities firm and is subject to the Swiss Financial Institutions Act of 15 June 2018 (FinIA). As a licensed financial institution, Vontobel SFA is supervised by the Swiss Financial Market Supervisory Authority (FINMA). Its business activities include portfolio management and investment advisory services as further described in the Wrap Fee Program Brochure (ADV Part 2A).

Contact Vontobel Swiss Financial Advisers AG:

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Contact FINMA:  
Swiss Financial Market Supervisory Authority FINMA  
Laupenstrasse 27  
3003 Bern  
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#### 2. Ombudsman service

We are not satisfied until you are. If we fail to meet your expectations at any time, please contact your WMC. Together we will find a way to resolve the issue.

If we are unable to find an amicable solution, you can contact the Swiss Banking Ombudsman Verein 'Ombudsstelle Finanzdienstleister' (OFD) ("Ombudsman"). This is the Ombudsman service responsible for Vontobel SFA and is a free and neutral information and mediation agency. As a general rule, the Ombudsman only gets actively involved after Vontobel SFA receives and has had an opportunity to respond to a written client complaint.

Detailed contact information for the relevant ombudsman and further information on our complaints process can be obtained on the internet at <https://www.vontobelsfa.com/en-us/legal-notice/ombudsman/>

#### 3. Cost Information

Both Vontobel SFA and third parties may apply costs and fees in connection with the provision of financial services. We distinguish between costs and fees that are charged directly to your account and costs reducing the returns of a financial instrument.

You can find a general overview of the costs and fees of Vontobel Swiss Financial Advisers and third parties in the Wrap Fee Program Brochure (ADV Part 2A). The costs for the purchase or sale of recommended financial instruments are disclosed in e.g. Key Investor Document [KID] or Prospectus. Upon your specific request, the costs will be disclosed to you prior to every transaction and/or an overview of your financial transactions may be included in your statement of assets. Your WMC remains at your disposal should you need any further information.

#### 4. Risk information

Transactions with financial instruments involve opportunities and risks. It is important that you understand these risks before using a financial service. In the Wrap Fee Program Brochure (ADV Part 2A) you will find important information about the typical risks taken when trading with financial instruments. Please read this information carefully and contact your WMC if you have any questions.

This brochure is available at <https://www.vontobelsfa.com/globalassets/sfa/documents/wrap-fee-disclosure-brochure-form-adv-part-2a.pdf>.

The risks and characteristics related to the financial services that are provided by Vontobel SFA as well as your pertaining rights and obligations are outlined in the respective agreements. In addition, when providing investment advice regarding the entire portfolio (Portfolio-based Advice); information about the risks that arise out of the chosen investment strategy for your assets is provided to you when filling out the risk profile together with your WMC. If you give purchase and sales orders without investment advice ("execution-only transactions") from Vontobel SFA, Vontobel SFA will not assess the appropriateness or the suitability of such transactions, unless required by law. This information is only provided here and will not be repeated at the time such transactions occur.

### **5. Product information**

Where financial instruments are personally recommended, financial service providers shall also make the key information document available to the retail client insofar as such a document must be produced for the financial instrument recommended. In the case of a compound financial instrument, a key information document shall be made available for said instrument only.

The Key Information Document contains information about the characteristics, risks, and costs of the financial instrument(s) and makes it possible to compare different financial instruments.

If provided by the supplier, these documents can be obtained from your WMC.

### **6. Conflicts of interest**

Conflicts of interest may arise from Vontobel SFA's various business activities. Vontobel SFA takes measures to avoid conflicts of interest or to protect clients from disadvantages. If a disadvantage for clients cannot be excluded, the conflict will be disclosed in the agreements and/or Wrap Fee Program Brochure (ADV Part 2A).

### **7. Information on the market offer taken into account**

The market offer taken into account by Vontobel SFA when selecting financial instruments comprises of Vontobel, as well as other financial instruments. Hence, the Vontobel SFA approved offering consists of both Financial instruments that are issued, managed, developed or controlled by Vontobel SFA or Vontobel Group entities ("Vontobel Financial instruments") and of third party providers. You can find further information on the considered financial instruments in the in the Wrap Fee Program Brochure.