

Client Information

This text applies mutatis mutandis to females and a plural

This information brochure provides you with information about Oriens Swiss Advisors AG (hereinafter referred to as «Oriens» or «Asset Manager»), our measures to avoid assets without contact and dormant assets, the financial services we offer and the associated risks, how we deal with conflicts of interest, compensations and the initiation of mediation proceedings before the Ombudsman's Office as well as the data protection declaration. The information in this brochure may change from time to time. The current version of this brochure can be accessed at any time at www.oriens.ch.

We inform you about the costs and fees of the financial services offered in the respective appendix to our asset management or advisory agreement.

For information on the risks generally associated with financial instruments, please refer to the brochure «Risks Involved in Trading Financial Instruments» published by the Swiss Bankers Association. The brochure is available on the internet: www.swissbanking.ch.

This brochure fulfils the information requirements under the Financial Services Act (FinSA) and the Ordinance to the Federal Act on Data Protection (DPO) and is intended to provide you with an overview of the financial services offered by Oriens and the handling of client data.

Should you require further information, we would be pleased to be at your disposal in a personal meeting.

Oriens Swiss Advisors AG

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1.1 General information

Name	Oriens Swiss Advisors AG
Address	Theaterstrasse 16
ZIP / City	8001 Zürich
Website	www.oriens.ch
Trade Reg. Nr.:	CHE-149.316.226

1.2 Field of activity

Oriens has its registered office and place of business in 8001 Zürich. It essentially carries out the following activities:

- Portfolio Management for retail, professional and institutional clients;
- Investment advice for professional and institutional clients.

1.3 Supervisory status and competent authority and supervisory organization

Oriens is licensed as a portfolio manager pursuant to Article 17 of the Financial Institutions Act (FinIA). The license was granted by the Swiss Financial Market Supervisory Authority FINMA, Laupenstrasse 27, 3003 Bern. Oriens is supervised by the supervisory organization AOOS – Schweizerische Aktiengesellschaft für Aufsicht, Clausiusstrasse 50, 8006 Zürich.

1.4 Business affiliations

Oriens has no economic associations with third parties which could lead to a conflict of interest.

In particular, Oriens is neither legally nor economically part of a group or corporate structure, nor does it maintain any significant ties with third parties.

As an independent asset manager, Oriens cooperates with several custodian banks.

2. Dormant assets

Occasionally, contacts with clients are broken off and assets subsequently become dormant. Such assets can be permanently forgotten by the clients and their heirs. The following is recommended to avoid loss of contact or dormant assets:

- **Change of address and name:** Immediate notification of any change of residence, address or name;
- **Special instructions:** Information about longer absences and of any redirection of correspondence to a third-party address as well as of how the client can be reached in urgent cases during this time;
- **Granting of powers of attorney:** An authorized person can be designated whom Oriens can approach in the event of an interruption of contact;
- **Substitute contacts:** It may be advisable to provide the contact details of the legal successors and/or other persons who can be contacted by Oriens in the event of a breakdown or loss of contact in order to (re)establish contact with the client or his legal successors. It is the client's responsibility to inform Oriens of any changes in the respective contact details;

- **Orientation of trusted persons and testamentary disposition:** Another possibility to avoid lack of contact and news is to inform a trusted person about the relationship with the asset manager. However, the asset manager may only provide information to such a trusted person if he or she has been authorized to do so in writing. Furthermore, the assets concerned may be mentioned, for example, in a testamentary disposition.

Oriens is available for any questions. Further information can also be found in the brochure «Dormant Assets» published by the Swiss Bankers Association. The brochure is available on the Internet under the online link «<https://www.swissbanking.ch>».

3. Financial services offered by Oriens

3.1 Portfolio Management

3.1.1 Nature, features and functionalities of the financial service

In asset management, Oriens manages, in the name, for the account and at the risk of the client, assets which the client has deposited with a custodian bank. Oriens carries out transactions at his own discretion and without consulting the client. In doing so, Oriens ensures that the transaction he executes corresponds to the client's financial circumstances and investment objectives as well as to the investment objectives agreed with the client and ensures that the structuring of the portfolio is suitable for the client.

3.1.2 Rights and obligations

The client has the right that the assets in his portfolio are managed by the asset manager. In doing so, Oriens selects the investments within the framework of the considered market offer to be included in the portfolio with due care. Oriens shall ensure an appropriate distribution of risk to the extent permitted by the investment strategy. It shall regularly monitor the assets under his management and ensure that the investments are in line with the investment strategy agreed on in the investment profile and are suitable for the client.

Oriens shall regularly inform the client about the asset management agreed on and provided to the client.

Pursuant to Art. 72 FinSA, Oriens is also obliged to provide the client with a copy of its client file and all documents relating to them at the client's request. By signing the contract, the client agrees that the disclosure may be made electronically.

3.2 Portfolio-related investment advice

3.2.1 Nature, features and functionalities of the financial service

In providing comprehensive investment advice, Oriens advises the client on transactions in financial instruments, considering the portfolio. To this end, Oriens ensures that the recommended transaction corresponds to the financial circumstances and investment objectives as well as the needs of the client or the investment strategy agreed with the client. The client then decides for himself to what extent he wishes to follow the recommendation of Oriens.

3.2.2 Rights and obligations

In the case of a portfolio-related investment advice, the client has the right to receive personal investment recommendations that are suitable for him. Portfolio-related investment advice is provided regularly in relation to financial instruments available within the scope of the market

offer considered. In doing so, Oriens shall advise the client to the best of its knowledge and belief and with the same diligence that it uses in its own affairs.

Oriens regularly checks whether the structuring of the portfolio corresponds to the agreed investment strategy. If it is determined that there is a deviation from the agreed percentage structuring, Oriens recommends a corrective measure to the client.

Oriens shall draw up an advisory record for each advisory meeting. The client may at any time request that a record of one or more specific advisory meetings be provided.

Pursuant to Art. 72 FinSA, Oriens is also obliged to provide the client with a copy of its client file and all documents relating to it at the client's request. By signing the contract, the client agrees that the documents may be provided electronically.

3.3 Risks

The following risks may arise in connection with the financial services provided by Oriens, which are within the client's sphere of risk and must therefore be borne by the client:

- **Risk of the selected investment strategy:** The investment strategy selected and agreed upon by the Client may give rise to various risks (cf. below). The client bears these risks in full. A presentation of the risks and a corresponding risk explanation are provided before the investment strategy is agreed on.
- **Substance preservation risk** or the risk that the financial instruments in the portfolio depreciate: This risk, which can vary depending on the financial instrument, is borne in full by the client. For the risks of the individual financial instruments, please refer to the brochure «Risks Involved in Trading Financial Instruments» of the Swiss Bankers Association.
- **Information risk on the part of Oriens or the client, or the risk that Oriens or the client has too little information to make an informed investment decision:**
 - In the case of **portfolio management**, Oriens will take into account the client's financial circumstances and investment objectives. If the client provides Oriens with insufficient or inaccurate information regarding his financial circumstances and/or investment objectives, there is a risk that Oriens will not be able to make investment decisions that are suitable for the client.
 - In the case of **portfolio-related investment advice**, the client makes the investment decisions, even if Oriens takes the portfolio into account in the portfolio-related investment advice. Accordingly, the client requires expertise to understand the financial instruments. Thus, investment advice creates the risk for the client that he will not follow investment recommendations that are suitable for him due to a lack of or inadequate financial knowledge.
- **Risk as a qualified investor in collective investment schemes:** Clients who make use of asset management or investment advisory services within the framework of a permanent portfolio management or investment advice relationship are considered as qualified investors within the meaning of the Collective Investment Schemes Act (CISA). Qualified investors have access to forms of collective investment schemes that are exclusively open to them. This status allows a broader range of financial instruments to be taken into account. Collective investment schemes for qualified investors may be

exempt from regulatory requirements. Such financial instruments are therefore not or only partially subject to Swiss regulations. This may give rise to risks, in particular with regard to liquidity, investment strategy or transparency. Detailed information on the risk profile of a particular collective investment scheme can be found in the constituent documents of the financial instrument and, where applicable, in the basic information sheet and the prospectus.

- **Cluster risks or concentration risks** refer to the risk of a portfolio being dependent on certain securities, issuers, etc. if these make up a large part of the portfolio. In times of a market downturn, such portfolios may suffer more extensive losses than more diversified portfolios. Oriens addresses these risks in the context of asset management and portfolio-based investment advice by monitoring the following thresholds:
 - Concentrations of 10% or more in **individual securities**;
 - Concentrations of 20% or more **from individual issuers** (incl. cash positions with individual banks).

Concentrations due to collective investment schemes that are subject to regulatory risk diversification requirements are excluded from these thresholds.

The provisions on cluster risks also apply in the same way to proprietary products of Oriens or to products of third parties economically linked to Oriens.

In the case of **investment advisory services**, the following additional risks may arise:

- ***Risk regarding timing when placing orders*** or the risk that following an advice, the client places a buy or sell order too late, which can lead to price losses: The recommendations made by Oriens based on the market data available at the time of the advice and are only valid for a short period of time due to the market dependency.

Furthermore, both portfolio management and investment advice may involve risks that lie within the sphere of risk of Oriens and for which Oriens is liable vis-à-vis the client. Oriens has taken appropriate measures to counter these risks, in particular by observing the principle of good faith and the principle of equal treatment when processing client orders. As far as it is within its sphere of influence Oriens shall ensure the best possible execution of client orders.

3.4 Market offer taken into account

The market offer taken into account when selecting the financial instruments comprises own and third party financial instruments. Within the scope of portfolio management and portfolio-related investment advice, the following financial instruments in particular are available to the client:

- Account balances with domestic and foreign banks
- Money market investments
- Interest-bearing debt securities (bonds, etc.)
- Equity securities (shares, etc.)
- Collective investment instruments (investment funds of all standard banking investment instruments, namely securities, indices, real estate, commodities)
- Alternative investments, non-traditional investments

- Standardized and non-standardized derivative financial instruments
- Precious metals
- Insurance products

Oriens may use derivative products on behalf of its clients. Oriens shall only use such products if and to the extent that this is permissible in accordance with the legal, professional and contractual investment regulations applicable in the specific case and taking into account any investment instructions. Derivatives are used in this context to hedge existing securities positions or to build up new securities positions. Derivatives that are traded on a recognised stock exchange or over-the-counter are permitted.

Oriens may also use its own products such as self-managed strategy indices (Actively Managed Certificate, AMC) or self-managed funds for its clients if and to the extent that this is permissible in accordance with the statutory, professional and contractual investment regulations applicable in the specific case and taking into account any investment instructions.

The client is aware that Oriens may receive additional compensation when using its own financial instruments, in particular self-managed products, e.g. due to management fees that may arise at the product level (so-called double remuneration). These are treated as third-party compensation and the corresponding measures apply (see section 4.2).

The use of structured products is associated with particular risks for investors, such as issuer and guarantor risks. Oriens takes these risks into account appropriately in its risk management and explicitly draws its customers' attention to the risks associated with the structured products in a suitable manner.

The Oriens will generally purchase these assets through a bank, stock exchange or broker. However, it may also make the acquisition outside organized markets or multi-lateral trading systems.

4. Conflicts of Interest

4.1 In general

Conflicts of interest may arise when Oriens has an interest in the outcome of a financial service provided to clients that is contrary to that of the Clients.

Possible causes of conflicts of interest are namely:

- Financial incentives for Oriens to carry out certain investment decisions, e.g. compensation from third parties
- The use of Oriens 's own products or those of third parties economically linked to it
- The coincidence of several client orders
- The coincidence of client orders with Oriens 's own transactions or those of his employees.

The following chapter regulates the handling of compensation from third parties and proprietary products.

Furthermore, no conflicts of interest arose in the course of providing services to the customer at Oriens that could not be completely resolved by countermeasures.

4.2 Use of own financial instruments in addition to those of third parties

Oriens may experience the following conflicts of interest as a result of using its own financial instruments, in particular self-managed products:

- Receiving additional compensation, in particular levying additional management fees at the product level (so-called double remuneration).
- Regardless of management fees, Oriens may have an interest in maximizing the volume of these products in order to reduce costs or take advantage of synergies, for example.

These conflicts of interest cannot be completely eliminated, but the following measures have been taken to mitigate them:

- Organizational measures to avoid unjustified preferential treatment of own financial instruments over third-party financial instruments
- Contractual stipulation of a maximum limit for the use of own products, within the scope of the investment volume, investment strategy and other client instructions;
- Additional compensation from own products is considered third-party compensation and the corresponding measures apply.
- Oriens also agrees with the client on a performance-related profit share based on the annual performance increase of the total assets under management. This is intended to align the interests of Oriens and the client.

4.3 Compensations from third parties

Oriens may receive compensation from third parties (e.g., brokerage fees, commissions, rebates, kick-backs, finder's fees, trailer fees or other pecuniary benefits) in connection with the provision of its financial services.

The level of third-party compensation is independent of the chosen investment strategy. Without prejudice to the ranges specified in the financial services agreement, the individual components of third-party compensation are as follows.

Form of compensation	Compensation amount (based on market value as of reporting date)
Distribution fees for investment funds ¹	0.00% – 0.50%
Distribution fees for structured products and certificates	0.00% – 2.00%
Custodian bank fees/Net new money provisions	0.00% – 1.00%
Commissions on brokerage fees for stock market transactions	0.00% – 50%
Commissions on custody fees	0.00% – 50%

¹The investment volume corresponds to the market value of the customer's fund units as of the reporting date.

In order to avoid potential conflicts of interest in this context, Oriens has taken the following measures to minimize conflicts of interest by compensating third parties:

- Contractual regulation specifying the range in the individual service contracts. The customer can request further information about possible future compensation from third parties and how it will be handled at any time.
- Obligation to disclose compensation from third parties: Upon request, Oriens shall inform the client of the compensation received. Information on such a request is provided free of charge once a year; if the customer exercises this right more frequently, Oriens reserves the right to charge a fee to cover costs.

5. Ombudsman's offices

In the event of disputes, the client may initiate a mediation procedure before the following ombudsman's office:

Name	OFS Ombud Finance Switzerland
Address	16 Boulevard des Tranchées
ZIP / City	1206 Genf
Phone	+41 22 808 04 51
E-Mail	contact@ombudfinance.ch
Website	https://ombudfinance.ch

6. Data Privacy Policy

Please refer to our data privacy policy accessible under <https://oriens.ch/privacy-policy/>.