

Information – Financial Services Act (FinSA)

1. Information on Banque Banorient (Suisse) SA

Banque Banorient (Suisse) SA (hereafter: the "Bank") offers services in the fields of wealth management, investment advisory, order execution and other investment related services. The Bank has its head office at rue Rodolphe-Toepffer 1, 1206 Geneva, Switzerland.

The Bank is registered in the Swiss Commercial Register. It is subject to Swiss banking regulations, holds a Swiss banking license and is supervised by the Swiss Financial Market Supervisory Authority (FINMA). The provision of financial services by the Bank is now subject to the provisions of the Financial Services Act (FinSA).

2. Contact

For more information on the organization, structure, business links and the people responsible for the Bank, please contact the Administrative Management (dir.administr@banorient Suisse.ch).

3. Purpose of the Financial Services Act (FinSA)

The purpose of the FinSA is to protect the clients of financial service providers such as the Bank by establishing uniform and transparent conditions for the provision of such services or financial instruments in Switzerland.

4. Client categorization

Unless they advise otherwise, the Bank classifies all its clients as private clients by default. Clients therefore automatically benefit from the highest level of protection provided by the FinSA.

Particularly wealthy and experienced individuals in the financial sector can declare that they wish to be treated as professional clients (so-called opting out declaration according to FinSA). A professional client enjoys a lower level of protection than a private client. In particular, the Bank may assume that persons acting as professionals have sufficient experience, knowledge and expertise to make investment decisions on their own and to correctly assess the associated risks, in addition to bearing the financial risks arising for them.

If the client qualifies as a professional, he can expressly waive the application of the rules of conduct of art. 8, 9, 15 and 16 of the FinSA (duties of information, documentation and rendering of account).

The last segment is the institutional clients, for which the rules of the FinSA as described in this document do not apply.

5. Code of conduct applicable to private clients

The following are the rules of conduct to be followed by the Bank in its relationships with private clients, from which our clients already benefit in a large part:

- Duty of information
- Assessment of the suitability of the services provided and the appropriateness of the financial instruments recommended
- Documentation et rendering of account
- Transparency and care in client orders (best execution due to the client)

6. Duty of information of financial products and instruments

When advising or recommending investment funds, ETFs or structured products, the Bank must first provide the private client with a Basic Information Sheet on the product in question. This duty does not apply in the context of a discretionary management mandate.

It goes without saying that the Bank can only fulfil this obligation if the issuer of the product provides such a document.

7. Financial services offered

Discretionary management

Discretionary management is intended for clients who wish to entrust the Bank with the management of their assets within the framework of the Bank's investment policy and the criteria defined individually and in writing (investment strategy). The investment strategy takes into account the knowledge and experience of each client, his investment objectives and his financial situation. With a discretionary management mandate, the Bank is authorized to make investments at its own discretion or appreciation, within the limits of the management agreed with the client.

Investment advisory

An investment advisory mandate is intended for clients who wish to receive personal recommendations regarding transactions in financial instruments or products. In contrast to discretionary management, the investment decision is always made by the client himself. Under such an advisory mandate, the decision-making power and responsibility for the investment rests solely with the client.

The FinSA distinguishes between investment advisory services for individual transactions where the client's entire portfolio is not taken into account (investment advisory services without portfolio monitoring), and investment advisory services that take the client's entire portfolio into account (investment advisory services with portfolio monitoring).

Simple execution and transmission of client orders

Transactions in financial instruments that are not based on an investment decision or recommendation by the Bank and that are carried out exclusively at the request of the client are treated by the Bank as "execution only" transactions. In doing so, the Bank does not perform a suitability test or a test of the appropriateness of the financial services offered.

8. Suitability of financial services

The suitability test or review carried out by the Bank on the financial services it offers is based on the information provided by the client. The Bank must be able to rely on this information. If the client does not provide the information and data requested or provides them incompletely, the Bank cannot guarantee the suitability of the services offered to the client.

Service suitability test

In the context of investment advisory services with portfolio monitoring or discretionary management, the Bank must obtain various information from the client. This includes - insofar as relevant - information on:

- The client's knowledge and experience with the agreed financial service, which includes the granting of a lombard loan in this context;
- The client's investment objectives, including: information on the time horizon and purpose of the investment, the client's risk appetite and any investment restrictions;
- The client's financial situation: Information on the nature and amount of the client's regular income, assets and current and future financial obligations.

On the basis of this information, the Bank establishes a risk profile with the client and agrees on an investment strategy for the client.

Product appropriateness test

If the investment advice is limited to ad hoc advice on individual transactions without taking into account the client's entire portfolio (investment advice without portfolio monitoring), the Bank is only obliged to check the appropriateness of the recommended financial instruments with regard to the client's knowledge and experience.

Representation and joint account relationships

In assessing the knowledge and experience of legal entities, as well as in the case of a power of attorney, the Bank focuses on the person who represents the company or the client vis-à-vis the Bank. If the proxy is only authorized to sign collectively, all persons involved must have the knowledge and experience necessary to understand the services being offered. When assessing the financial situation and investment objectives, the Bank always focuses on the account holder.

9. Best execution of orders

When executing its clients' orders, the Bank seeks to obtain the best possible result in terms of cost, time and quality of execution.

Further information on the order handling and execution policy is provided upon request by the client.

10. Remunerations received from third-parties

This important aspect of the relationship between the parties is dealt with in detail in the Bank's General Terms and Conditions and the account opening documents, to which the reader is requested to refer.

11. Conflicts of interest

The Bank strives to protect the interests of its clients, shareholders and employees. Nevertheless, conflicts of interest cannot always be completely excluded. Conflicts of interest may arise between the Bank, its employees and the Bank's clients or between the Bank's clients. In this context, organizational measures are taken to avoid such conflicts.

12. Banking Ombudsman (mediator)

If the Bank or its services do not meet the client's expectations, the client is first invited to contact his or her relationship manager. He or she will try to find a way to resolve the problem with the client.

Nevertheless, if it is not possible to reach an amicable solution, disputes between the Bank and the client will be settled, as far as possible, by a non-bureaucratic, fair, rapid, neutral and confidential mediation procedure via the Swiss Banking Ombudsman:

Swiss Banking Ombudsman
Bahnhofplatz 9, 8021 Zurich
www.bankingombudsman.ch

Generally, the mediation procedure is activated after a written complaint has been submitted to the Bank and no agreement has been reached between the parties. Proceedings before the Ombudsman are free of charge for the client.