

Information about the financial services provided by SSI Wealth Management AG

This text applies analogously to male and female persons and a plurality of persons.

Dear Sir or Madam

This brochure provides you with information about SSI Wealth Management AG (hereinafter referred to as the «asset manager»), our measures to prevent the loss of contact or dormancy, the financial services we offer and the associated risks, the handling of conflicts of interest and the initiation of mediation proceedings before the ombudsman's office. The information provided in this brochure may change from time to time. You can find the latest version of this brochure on our website at www.ssi-wm.ch, or you can obtain a hard copy from our business address.

We will inform you about the costs and fees for the financial services offered separately / in the respective annex to the financial services contract.

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 at www.ssi-wm.ch.

This brochure fulfils the information requirements under the Financial Services Act and is intended to provide you with an overview of the financial services provided by the asset manager. Should you require further information, we will be happy to arrange a personal meeting with you.

SSI Wealth Management AG

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1. Information about the asset manager

1.1 Name and address

Name	SSI Wealth Management AG
Address	Lindenhofweg 4
Postcode / city	CH-8806 Bäch/SZ
Telephone	+41 44 787 67 00
Email	infos@ssi-wm.ch
Website	www.ssi-wm.ch
Comm.Reg. no. / VAT no.	CHE-115.560.188

1.2 Field of activity

The asset manager is domiciled in Bäch. It offers asset management and investment advisory services.

1.3 Supervisory status, competent authority and supervisory organisation

The asset manager has a licence in accordance with Art. 5 para. 1 of the Financial Institutions Act that was granted by the Swiss Financial Market Supervisory Authority FINMA. The asset manager is also overseen by the supervisory organisation AOOS – Schweizerische Aktiengesellschaft für Aufsicht, Clausiusstrasse 50, 8006 Zurich.

1.4 Professional secrecy

The asset manager is subject to the obligation of professional secrecy in accordance with the Financial Institutions Act.

1.5 Economic ties to third parties

The asset manager has economic ties to third parties, which may lead to a conflict of interest. This relates to compensation, retrocessions and portfolio commission. The third parties include other companies within the group structure, custodian banks, issuers of structured products and external fund providers. For clients, this poses the risk that financial instruments issued by companies within the Group structure, custodian banks, issuers and fund providers are favoured due to the compensation provided. The asset manager has taken a number of precautions to minimise these risks. It has adopted internal directives that clearly regulate the investment and selection process. There is also a functional and hierarchical separation of the risk and compliance management functions from the operating units and from the functions that provide financial services. In the case of financial instruments issued by another company within the group structure, the management fee is discounted to reduce the economic incentive to sell these products.

2. Dormant assets

Sometimes contact with a client is broken off and the assets become dormant as a result. Such assets can be permanently forgotten by clients and their heirs. The following is recommended to avoid losing contact or dormancy:

- **Address and name changes:** Please notify us immediately if you change your place of residence, address or name.
- **Special instructions:** Please inform us if you will be absent for a longer period and instruct us to redirect your correspondence to a third-party address or to retain the correspondence for you, as well as how you can be contacted in an emergency during this time.
- **Granting of powers of attorney:** It may be advisable to designate an authorised person whom the asset manager can contact in the event that contact is broken off.
- **Information for trusted advisers and last will and testament:** Another way to avoid a lack of contact and dormancy is to inform a trusted adviser about the relationship with the asset manager. However, the asset manager may only provide information to such a trusted adviser if it has been authorised to do so in writing. The assets concerned can also be mentioned in a last will and testament, for example.

The asset manager will be happy to answer 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 at www.ssi-wm.ch.

3. Information about the financial services offered by the asset manager

3.1 Asset management

3.1.1 Nature, characteristics and functioning of the financial service

In asset management, the asset manager manages assets deposited by the client with a custodian bank in the name, for the account and at the risk of the client. The asset manager executes transactions at its own discretion and without consulting the client. In doing so, the asset manager ensures that the transactions executed by it correspond to the financial circumstances and investment objectives of the client as well as the investment strategy agreed with the client, and ensures that the portfolio is structured in a manner that is suitable for the client.

3.1.2 Rights and duties

With asset management, the client has the right to the management of the assets in their portfolio. The asset manager selects the investments to be included in the portfolio with due care and within the scope of the considered market offer. The asset manager ensures appropriate risk diversification insofar as the investment strategy permits. It regularly monitors the assets under its management and ensures that the investments are in line with the agreed investment strategy and are suitable for the client.

The asset manager regularly informs the client about the asset management service agreed and provided.

3.1.3 Risks

Asset management generally involves the following risks, which lie within the client's sphere of risk and are therefore borne by the client:

- **Risk of the chosen investment strategy:** Different risks may arise from the investment strategy chosen and approved by the client (see below). The client bears these risks in full. A presentation of the risks and a corresponding risk disclosure take place before the investment strategy is agreed.
- The **risk** that the financial instruments in the portfolio will lose value: This risk, which may vary depending on the financial instrument, is borne in full by the client. For the risks associated with the individual financial instruments, please refer to the brochure «Risks Involved in Trading Financial Instruments» published by the Swiss Bankers Association.
- **Information risk on the part of the asset manager** or the risk that the asset manager has too little information to be able to make an informed investment decision: When managing assets, the asset manager takes into account the client's financial circumstances and investment objectives (suitability test). If the client provides the asset manager with insufficient or inaccurate information about their financial circumstances and/or investment objectives, there is a risk that the asset manager will not be able to make suitable investment decisions for the client.
- **Risk as a qualified investor in collective investment schemes:** Clients who utilise asset management within the framework of a long-term asset management mandate are deemed to be qualified investors as defined by the Collective Investment Schemes Act. Qualified investors have access to forms of collective investment schemes that are exclusively open to them. This status provides access to a broader range of financial instruments when structuring the portfolio. 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, particularly in terms of liquidity, investment strategy or transparency. Detailed information on the risk profile of a specific collective investment scheme can be found in the constituent documents of the financial instrument and, where applicable, in the key investor information document and the prospectus.

Furthermore, risks arise in asset management that lie within the asset manager's sphere of risk. The asset manager has taken appropriate measures to counter these risks, in particular by observing the principles of good faith and equal treatment when processing client orders. Furthermore, the asset manager ensures the at-best execution of client orders.

3.1.4 Market offer considered

The market offer considered when selecting financial instruments includes own and third-party financial instruments. The following financial instruments are available to the client for the purposes of asset management:

- Equity securities (esp. shares, participation or dividend-right certificates)
- Debt securities (esp. bonds)
- Money market instruments (esp. fixed-term deposits, fiduciary deposits)
- Units in collective investment schemes (esp. investment funds)
- Structured products and derivatives for hedging purposes
- Foreign exchange and currency forwards
- Precious metals
- Cryptocurrencies
- Alternative investments (esp. private markets)

3.2 Portfolio-based investment advice

3.2.1 Nature, characteristics and functioning of the financial service

In the context of portfolio-based investment advice, the asset manager advises the client on transactions with financial instruments, taking the portfolio into account. To this end, the asset manager ensures that the recommended transaction corresponds to the client's financial circumstances and investment objectives (suitability test) as well as their needs or the investment strategy agreed with the client. The client then decides for themselves to what extent they wish to follow the asset manager's recommendation.

3.2.2 Rights and duties

In the context of portfolio-based investment advice, the client has the right to receive personalised investment recommendations that are suitable for them. Portfolio-based investment advice is regularly provided in relation to financial instruments within the scope of the market offer considered. In doing so, the asset manager advises the client to the best of its knowledge and belief and with the same diligence that it applies to its own affairs.

The asset manager regularly checks whether the structuring of the portfolio for portfolio-based investment advice corresponds to the agreed investment strategy. If it is established that there is a deviation from the agreed percentage structuring, the asset manager recommends a corrective measure to the client.

The asset manager informs the client immediately of any material circumstances that could affect the correct processing of the order. Furthermore, the asset manager regularly informs the client about the investment advice agreed and provided.

3.2.3 Risks

In the context of portfolio-based investment advice, the following risks generally arise that lie within the client's sphere of risk and are therefore borne by the client:

- **Risk of the chosen investment strategy:** Different risks may arise from the investment strategy chosen and approved by the client (see below). The client bears these risks in full. A presentation of the risks and a corresponding risk disclosure take place before the investment strategy is agreed.
- The **risk** that the financial instruments in the portfolio will lose value: This risk, which may vary depending on the financial instrument, is borne in full by the client. For the risks associated with the individual financial instruments, please refer to the brochure «Risks Involved in Trading Financial Instruments» published by the Swiss Bankers Association.
- **Information risk on the part of the asset manager** or the risk that the asset manager has too little information to be able to make a suitable recommendation: In the context of portfolio-based investment advice, the asset manager takes into account the financial circumstances and investment objectives (suitability test) as well as the needs of the client. If the client provides the asset manager with insufficient or inaccurate information about their financial circumstances, investment objectives or needs, there is a risk that the asset manager will be unable to provide them with suitable advice.
- **Information risk on the part of the client** or the risk that the client has too little information to be able to make an informed investment decision: Even if the asset manager takes the portfolio into account when providing portfolio-based investment advice, it is the client who makes the investment decisions.

Accordingly, the client requires specialised knowledge in order to understand the financial instruments. This creates the risk for clients that they will not follow suitable investment recommendations due to a lack of or inadequate financial knowledge.

- **Risk with regard to the timing of order placement** or the risk that the client places a buy or sell order too late following a recommendation, which can lead to price losses: The recommendations made by the asset manager are based on the market data available at the time of the recommendation and are only valid for a short period of time due to market dependency.
- **Risk as a qualified investor in collective investment schemes:** Clients who utilise portfolio-based investment advice within the framework of a long-term investment advisory mandate are deemed to be qualified investors as defined by the Collective Investment Schemes Act. Qualified investors have access to forms of collective investment schemes that are exclusively open to them. This status provides access to a broader range of financial instruments when structuring the portfolio. 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, particularly in terms of liquidity, investment strategy or transparency. Detailed information on the risk profile of a specific collective investment scheme can be found in the constituent documents of the financial instrument and, where applicable, in the key investor information document and the prospectus.

Furthermore, portfolio-based investment advice entails risks that lie within the asset manager's sphere of risk. The asset manager has taken appropriate measures to counter these risks, in particular by observing the principles of good faith and equal treatment when processing client orders. Furthermore, the asset manager ensures the at-best execution of client orders.

3.2.4 Market offer considered

The market offer considered when selecting financial instruments includes own and third-party financial instruments. The following financial instruments are available to the client in the context of portfolio-based investment advice:

- Equity securities that are listed on relevant stock exchanges/trading venues
- Debt securities
- Units in collective investment schemes
- Structured products
- Derivatives

3.3 Transaction-based investment advice

3.3.1 Nature, characteristics and functioning of the financial service

In the context of transaction-based investment advice, the asset manager advises the client on individual transactions with financial instruments without taking the client's portfolio into account. When providing advice, the asset manager takes into account the knowledge and experience (appropriateness) and the needs of the client and, based on this, makes personal recommendations to the client for the purchase, sale or holding of financial instruments. The client decides for themselves to what extent they wish to follow the asset manager's recommendation. They are personally responsible for structuring their portfolio. The composition of the portfolio and the suitability of a financial instrument for the client, i.e. whether a financial instrument corresponds to the client's investment objectives and financial circumstances, are not reviewed by the asset manager.

3.3.2 Rights and duties

In the context of transaction-based investment advice, the client has the right to receive personalised investment recommendations. Transaction-based investment advice is provided on the initiative of the client in relation to financial instruments within the scope of the market offer considered. In doing so, the asset manager advises the client to the best of its knowledge and belief and with the same diligence that it applies to its own affairs.

The asset manager informs the client immediately of any material circumstances that could affect the correct processing of the order. Furthermore, the asset manager regularly informs the client about the investment advice agreed and provided.

3.3.3 Risks

In the context of transaction-based investment advice, the following risks generally arise that lie within the client's sphere of risk and are therefore borne by the client:

- The **risk** that the financial instruments in the portfolio will lose value: This risk, which may vary depending on the financial instrument, is borne in full by the client. For the risks associated with the individual financial instruments, please refer to the brochure «Risks Involved in Trading Financial Instruments» published by the Swiss Bankers Association.
- **Information risk on the part of the asset manager** or the risk that the asset manager has too little information to be able to make a suitable recommendation: In the context of transaction-based investment advice, the asset manager takes into account the knowledge and experience as well as the needs of the client. If the client provides the asset manager with insufficient or inaccurate information about their knowledge, experience and/or needs, there is a risk that the asset manager will be unable to provide them with suitable advice.
- **Information risk on the part of the client** or the risk that the client has too little information to be able to make an informed investment decision: When providing transaction-based investment advice, the asset manager does not take into account the composition of the portfolio and does not carry out a suitability test with regard to the client's investment objectives and financial circumstances. Accordingly, the client requires specialised knowledge in order to understand the financial instruments. Transaction-based investment advice therefore entails the risk for the client that, due to a lack of or inadequate financial knowledge, they may make investment decisions that do not correspond to their financial circumstances and/or investment objectives and are therefore not suitable for them.
- **Risk with regard to the timing of order placement** or the risk that the client places a buy or sell order too late following a recommendation, which can lead to price losses: The recommendations made by the asset manager are based on the market data available at the time of the recommendation and are only valid for a short period of time due to market dependency.
- **Risk of inadequate monitoring** or the risk that the client does not monitor their portfolio or does not monitor it adequately: At no time does the asset manager have any obligation to monitor, advise, warn or inform with regard to the quality of the individual investments and/or the structuring of the portfolio. Insufficient monitoring by the client can be associated with various risks, such as cluster risks.
- **Risk as a qualified investor in collective investment schemes:** Clients who utilise transaction-based investment advice within the framework of a long-term investment advisory mandate are deemed to be qualified investors as defined by the Collective Investment Schemes Act. Qualified investors have access to forms of collective investment schemes that are exclusively open to them. This status provides access to a broader range of financial instruments when structuring the portfolio. 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, particularly in terms of liquidity, investment strategy or transparency. Detailed information on the risk profile of a specific collective investment scheme can be found in the constituent documents of the financial instrument and, where applicable, in the key investor information document and the prospectus.

Furthermore, transaction-based investment advice entails risks that lie within the asset manager's sphere of risk. The asset manager has taken appropriate measures to counter these risks, in particular by observing the principles of good faith and equal treatment when processing client orders. Furthermore, the asset manager ensures the at-best execution of client orders.

3.3.4 Market offer considered

The market offer considered when selecting financial instruments includes own and third-party financial instruments. The following financial instruments are available to the client in the context of transaction-based investment advice:

- Equity securities that are listed on relevant stock exchanges/trading venues
- Debt securities
- Units in collective investment schemes
- Structured products
- Derivatives

3.4 Execution only

3.4.1 Nature, characteristics and functioning of the financial service

Execution only refers to all financial services that relate purely to the transmission of client orders by the asset manager, without any advice or management. With execution only, orders are initiated exclusively by the client and are transmitted by the asset manager. The asset manager does not check to what extent the transaction in question corresponds to the knowledge and experience (appropriateness) and the financial circumstances and investment objectives (suitability) of the client. In connection with the future placing of orders by the client, the asset manager will not remind the client again that no appropriateness and suitability test will be carried out.

3.4.2 Rights and duties

With execution only, the client has the right to place orders to buy or sell financial instruments within the scope of the market offer considered. The asset manager has the obligation to transmit orders for execution with the same diligence that it applies in its own affairs.

The asset manager informs the client immediately of any material circumstances that could affect the correct processing of the order. Furthermore, the asset manager regularly informs the client about the agreed and executed orders.

3.4.3 Risks

Execution only generally involves the following risks, which lie within the client's sphere of risk and are therefore borne by the client:

- The **risk** that the financial instruments in the portfolio will lose value: This risk, which may vary depending on the financial instrument, is borne entirely by the client. For the risks associated with the individual financial instruments, please refer to the brochure «Risks Involved in Trading Financial Instruments» published by the Swiss Bankers Association.
- **Information risk on the part of the client** or the risk that the client has too little information to be able to make an informed investment decision: With execution only, the client makes investment decisions without the involvement of the asset manager. Accordingly, the client requires specialised knowledge in order to understand the financial instruments, as well as time to engage with the financial markets. If the client does not have the necessary knowledge and experience, they run the risk of investing in a financial instrument that is inappropriate for them. A lack of or inadequate financial knowledge could also lead to the client making investment decisions that do not correspond to their financial circumstances and/or investment objectives.
- **Risk with regard to the timing of order placement** or the risk that the client chooses a bad time to place the order, which can lead to price losses.
- **Risk of inadequate monitoring** or the risk that the client does not monitor their portfolio or does not monitor it adequately: At no time does the asset manager have an obligation to monitor, warn or inform. Insufficient monitoring by the client can be associated with various risks, such as cluster risks.

Furthermore, execution only gives rise to risks that lie within the asset manager's sphere of risk. The asset manager has taken appropriate measures to counter these risks, in particular by observing the principles of good faith and equal treatment when processing client orders. Furthermore, the asset manager ensures the at-best execution of client orders.

3.4.4 Market offer considered

The market offer considered when selecting financial instruments is based on that of the custodian bank chosen by the client.

4. Dealing with conflicts of interest

4.1 In general

Conflicts of interest may arise if the asset manager:

- Can gain a financial advantage or avoid a financial loss at the expense of the client in breach of good faith;
- Has an interest in the outcome of a financial service provided to the client that is contrary to that of the client;
- Has a financial or other incentive to favour the interests of particular clients over the interests of other clients in the provision of financial services; or
- Accepts an incentive in the form of financial or non-financial benefits or services from a third party in breach of good faith in the provision of financial services to the client;
- Uses own products (funds) to implement the agreed investment strategy.

Conflicts of interest may arise in connection with execution only, transaction-based investment advice, portfolio-based investment advice and asset management. They are caused in particular by the concurrence of:

- Several client orders;
- Client orders with own transactions or other own interests of the asset manager or companies affiliated with the asset manager; or
- Client orders with transactions of the asset manager's employees.

The asset manager has adopted internal directives and taken organisational precautions to identify conflicts of interest and prevent them from being detrimental to the client:

- The asset manager has established an independent control function that continuously monitors the asset manager's investment and employee transactions as well as compliance with the rules of market conduct. Effective control and sanction measures thus enable the asset manager to avoid conflicts of interest.
- When executing orders, the asset manager observes the priority principle, i.e. all orders are recorded immediately in the chronological order in which they are received.
- The asset manager requires its employees to disclose any mandates that could lead to a conflict of interest.
- The asset manager designs its remuneration policy in such a way that there are no incentives for frowned-upon behaviour.
- The asset manager provides its employees with regular further training and ensures that they have the necessary expertise.
- The asset manager consults the control function in the event of possible conflicts of interest and obtains their authorisation.
- The asset manager grants clients a discount on the management fee when using its own products (funds).

4.2 Disclosure of conflicts of interest

Despite the precautions taken by the asset manager, the possibility of client interests being disadvantaged in connection with individual products cannot be ruled out. The asset manager provides information on conflicts of interest that cannot be avoided in the respective contractual documents made available to the client or in another suitable manner. Please do not hesitate to contact us if you have any further questions.

4.3 Compensation from third parties

In the context of the provision of financial services, the asset manager may accept compensation from third parties. The asset manager uses a separate declaration to inform its clients about the type, scope, calculation parameters and bandwidths of compensation from third parties that may accrue to the asset manager in the course of providing the financial service. **In the case of clients who waive compensation from third parties, the asset manager may retain this compensation or reimburse the compensation attributable to the client.** The asset manager has taken appropriate internal measures to avoid any resulting conflicts of interest.

Intermediaries who refer clients to the asset manager receive a share of or the entire management fee / compensation for expenses from the asset manager.

5. Privacy policy

The current version of the asset manager's privacy policy can be found on our website www.ssi-wm.ch and can also be sent out on request.

6. Ombudsman's office

Your satisfaction is our priority. If the asset manager has nevertheless rejected a legal claim on your part, you can initiate mediation proceedings through the ombudsman's office. In this case, please contact:

Name	OFS Ombud Finance Switzerland
Address	16 Boulevard des Tranchées
Postcode / city	1206 Geneva
Telephone	+41 22 808 04 51
Website	www.ombudfinance.ch