

## Information Sheet Financial Services Act (FinSA)

**In this Information Sheet we give you an overview of the most important information about the Swiss Financial Services Act (FinSA), as well as information about Banque Richelieu (Switzerland) Ltd (the “Bank”) and the financial services it provides that are subject to the FinSA.**

The most recent version of this Information Sheet can be obtained from your Relationship Manager or found on our website [www.banquerichelieu.ch](http://www.banquerichelieu.ch).

### **What does the FinSA regulate and how does the law affect your relationship with us?**

The Swiss Financial Services Act (FinSA) came into force on January 1, 2020 requiring all Swiss Banks to comply with this law by the end of 2021. Among other things, the FinSA aims to strengthen investor protection and the Swiss financial center and creates comparable conditions for financial service providers. It regulates the provision of financial services for investment clients. The law therefore particularly affects you if you conduct transactions in financial instruments with us either directly or via a financial services mandate.

The aim of the law is to provide investors with more comprehensive information than before in the provision of financial services and thus to strengthen investor protection. If we provide you with financial services such as the execution of securities transactions (execution-only), investment advice or portfolio management or if we grant you credit for the execution of such transactions, we have to comply with various rules of conduct, in particular with regard to information, organization, documentation and advertising.

### **Client Segmentation**

FinSA divides customers of financial service providers into retail clients, professional clients or institutional clients. This classification is based on the one hand on the personal financial circumstances or the level of knowledge, experience and financial expertise of a client and on the other hand on the legally defined company size or factors such as professional treasury or prudential supervision. Large companies and all companies subject to a prudential supervision or which have a professional treasury may be classified as professional or institutional clients, all other clients as retail clients.

Our clients are classified as retail clients and thus benefit from the most comprehensive investor protection. Switching to another segment is possible, by choice of the client and fulfilling certain selection criteria, e.g., a wealthy private client can declare that he is viewed as a professional customer and would therefore like to avail himself of less protection (opting-out). An institutional client can declare that he is viewed as a professional customer and would therefore like to take advantage of a higher level of protection (opting-in).

A description of all options and details on the selection criteria is provided by the Bank to each client with the Client Segmentation form.

If you wish, and if you meet the requirements in terms of the volume of financial assets and in terms of your financial expertise, you can apply for a change in your classification. To do this, please contact your Relationship Manager.

### **Who are we and how are we regulated?**

Banque Richelieu (Switzerland) Ltd is a boutique bank, based in Zürich, Switzerland. It is licensed as a bank and securities dealer and is supervised by the Swiss Financial Market Supervisory Authority (FINMA).

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#### Contact Information FINMA:

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Laupenstrasse 27  
3003 Berne  
+41 (0)31 327 91 00  
[www.finma.ch](http://www.finma.ch)

#### **Who can you contact if we do not meet your expectations?**

Your satisfaction is important to us. Should you have any concerns, please do not hesitate to contact your Relationship Manager directly. He will respond to your request immediately and work with you to find an amicable solution. If you have a complaint, you can also contact the Bank directly by email ([info@banquerichelieu.ch](mailto:info@banquerichelieu.ch)).

If the solution to your request is not to your satisfaction, you can contact the Ombudsman. The ombudsman is a neutral and free information and mediation agency. He deals with specific client complaints against a bank based in Switzerland. The ombudsman usually only becomes active after the client has submitted a complaint to the Bank in writing and the Bank has had the opportunity to take a position. Inquiries are treated confidentially by the ombudsman. He will only contact us if you agree.

#### Contact Information Ombudsman:

Finanzombudsstelle Schweiz (FINOS)  
Talstrasse 20 (1st floor)  
8001 Zürich  
+41 44 552 08 00  
[www.finos.ch](http://www.finos.ch)

#### **What risks are to be considered when investing?**

Investing in financial instruments is associated with both opportunities and risks. Depending on the financial instrument, these can be different. Basically, financial instruments with high opportunities also harbor high risks. It is therefore important that you study a financial instrument carefully before making an investment decision. The general risks are explained in the brochure "Risks Involved in Trading Financial Instruments" issued by the Swiss Bankers Association (available under the following link available on the website [www.swissbanking.ch](http://www.swissbanking.ch)): [SBA Risks Involved in Trading Financial Instruments 2023\\_EN.pdf](#)

#### **Where can you find information on financial instruments?**

The FinSA requires providers of collective investment schemes and derivatives, including structured products and debt securities with a derivative character, to prepare a key information document that describes the functionality, risks and costs of a financial instrument. This key information document or a comparable and recognized information sheet for the respective investment in which you are investing is provided by the respective issuer of the product.

With every personal recommendation to purchase financial instruments (investment advice), retail clients must be provided with this key information document or - on request - the prospectus for the financial instrument, depending on the financial instrument.

#### **Information about the financial services offered by Banque Richelieu (Switzerland) Ltd**

In our recommendations and our portfolio management mandates, we take into account both our own financial instruments and those from third-party providers. If the characteristics (e.g. risks, duration, profit prospects, etc.) of our financial instruments are the same as those of third parties, we may prefer our own financial instruments without expressly disclosing this in individual cases.

#### Transactions without advice (Execution-Only)

If the client does not want advice on buying or selling transactions, the Bank does not check whether the transactions are suitable or appropriate, and it does not check whether the client, based on his knowledge and experience, is able to understand and take the risks associated with the transaction. Clients only receive this notice at this point and not with every new execution-only transaction.

#### Transaction related-investment advice

As part of any transaction-related investment advice, the Bank advises clients on individual transactions with financial instruments without taking the advisory portfolio into account. In providing advice, the Bank takes into account the knowledge and experience (appropriateness) as well as the needs of the client and, based on this, gives the client personal recommendations for buying, selling or holding financial instruments. The client himself decides to what extent he would like to follow the recommendation of the Bank. He is responsible for structuring his advisory portfolio himself. The composition of the transaction-related advisory portfolio and the suitability of a financial instrument, such as whether a financial instrument corresponds to the client's investment goals and financial circumstances for the client, is not checked.

#### Portfolio related-investment advice

As part of portfolio-related investment advice, the Bank advises clients on transactions with financial instruments, taking into account the advisory portfolio. For this purpose, the Bank ensures that the recommended transaction corresponds to the financial circumstances and investment objectives (suitability test) 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 would like to follow the recommendation of the Bank.

#### Portfolio Management

Portfolio management is understood as the management of assets that the client deposits with the Bank for administration in his name, at his own risk and account. The Bank carries out transactions at its own discretion and without consulting the client. In doing so, the Bank ensures that the executed transaction corresponds to the financial circumstances and investment objectives of the client and the investment strategy agreed with the client and ensures that the portfolio structure is suitable for the client.

**What costs do you bear as investor??**

On the one hand, there are fees and expenses that we debit directly to your account. These are mainly transaction (charged per transaction) and custody fees (charged depending on the amount of assets). The fees and expenses for services such as personal investment advice and portfolio management are also debited directly to your account depending on the amount of assets. The current level of fees and expenses can be viewed at any time in the Bank's fee schedule.

On the other hand, certain fees and expenses are charged directly to the financial instrument. These are, for example, management fees for funds. Information on the fees for individual financial instruments can be found on the relevant key information document or a comparable and recognized information sheet for the investment in which you are investing. This is provided by the respective provider.

**How do we deal with conflicts of interest?**

When providing financial services, situations can arise in which opposing interests arise, which lead to clients being disadvantaged (so-called "conflicts of interest"). Such conflict situations need to be recognized at an early stage and eliminated as far as possible with suitable measures or, if this is not sufficiently possible, transparently disclosed to clients. The Bank has taken organizational and regulatory precautions to prevent possible conflicts of interest and to handle and/or disclose such conflicts of interest, if any, in accordance with legal requirements.

You will find further information on this in the "Conflicts of Interest Statement of Banque Richelieu (Switzerland) Ltd", which is made available to you upon request.

**What are our best execution principles for your transactions in financial instruments?**

Our execution principles include the measures taken to achieve the best possible execution of client orders for the purpose of buying or selling securities or other financial instruments. The aim is to always carry out client orders in the best possible way in terms of price, time and quality. The focus of these principles is always on safeguarding the interests of the client. You will find further information on this in the leaflet "Best Execution Policy at Banque Richelieu (Switzerland) Ltd", which is made available to you upon request.

The information contained in this document corresponds to the information obligation according to the Federal Law on Financial Services of June 15, 2018 (950.1 - FinSA, Articles 8 and 9) and the associated ordinance (950.11 - FinSO, Articles 6 to 15) of November 6, 2019. This document does not constitute a contract or an advertisement.