

FinSA Client information

Based on the legal requirements of Art. 8ff. of the Financial Services Act (FinSA), we would like to supply you with this information sheet which provides an overview of Alphen Asset Management AG (hereinafter referred to as the «financial institution») and its services.

A. Company information

Address

Street: Bleicherweg 74
Zip Code/City: 8002 Zurich
Phone: +41 (0)44 266 10 30
Email: info@alphen.ch
Website: www.alphen.ch

The financial institution was established in 2010.

Supervisory authority and audit firm

Under the new Federal Act on Financial Institutions (FinIA), all financial institutions need a license from FINMA to carry out their professional activities as a portfolio manager. The financial institution received its license on 05.11.2024 and is supervised by the supervisory organization AOS. The financial institution is audited by the auditing company BDO AG both in terms of regulatory law and obligations. The address of the supervisory organization and the audit company can be found below.

Supervisory organization: AOS Schweizerische Aktiengesellschaft für Aufsicht
Street: Clausiusstrasse 50
Zip Code / City: 8006 Zurich
Phone: +41 (0)44 215 98 98
Email: info@aos.ch
Website: www.aos.ch

Audit Firm Name: BDO AG
Address: Schiffbaustrasse 2
Zip Code / City: 8031 Zurich
Phone: +41 (0)44 444 35 55
Website: www.bdo.ch

Ombudsman

The financial institution is affiliated with the independent ombudsman office OFS, which is recognized by the Federal Department of Finance. Disputes concerning legal claims between the client and the financial services provider should be settled by an ombudsman's office, if possible, within the framework of a mediation procedure. The address of OFS is stated below.

Name Ombudsman: OFS Ombud Finance Switzerland
Address: 16 Boulevard des Tranchées
Zip Code / City: 1206 Geneva, Switzerland
Phone: +41 (0)22 808 04 51
Email: contact@ombudfinance.ch
Website: www.ombudfinance.ch

B. Information on the offered financial services

The financial institution provides portfolio management services, portfolio-based and transaction-based investment advisory services as well as execution-only services to its clients.

In the case of a transaction-based investment advisory mandate with the financial institution, a personal recommendation relating to individual financial instruments is provided to the client. The decision to buy or sell remains always ultimately with the client.

The financial institution does not guarantee any yield nor performance of investment activities. The investment activity can therefore lead to an appreciation or a depreciation in value.

The financial institution has all the necessary licences to perform the services described above.

C. Client segmentation

Financial service providers are required to classify their clients into a client segmentation according to the law and adhere to the respective code-of-conduct. The Financial Services Act provides for «retail clients», «professional clients» and «institutional clients» segments. For each client, a client classification is determined within the framework of the cooperation with the financial institution. Subject to certain conditions, the client may change the client classification by opting out.

D. Information on risks and costs

General risks associated with financial instruments transactions

The investment advisory and portfolio management services involve financial risks. The financial institution shall provide all clients with the «Risks associated with Financial Instruments Transactions» brochure prior to the execution of the contract. This brochure can also be found at www.swissbanking.ch.

Clients of the financial institution may contact their client advisor at any time if they have any further questions.

Risks associated with the offered services

For a description of the various risks that may arise from the investment strategy for clients' assets, please refer to the relevant investment advisory or portfolio management agreements.

If unusual concentrations of risk within the client portfolio cannot be ruled out, the nature and extent of such concentration risks shall be disclosed to the client. Indicators of such unusual concentrations of risk are:

- a concentration of 10% or more in individual securities;
- a concentration of 20% or more in individual issuers.

Concentrations from collective investment schemes that are subject to regulatory risk diversification rules, such as UCITS funds and Swiss securities funds, are excluded.

In the case of investment advice, the financial institution shall provide its retail clients with the basic information sheet of the recommended financial instrument.

Information on costs

A fee is charged for the services rendered, which is usually calculated on the assets under management and/or on a performance basis. For more detailed information, please refer to the relevant investment advisory or portfolio management agreements.

If it is not possible to determine the actual amount of remuneration or third-party services before the financial service is provided or the contract is concluded, the financial institution shall inform the client of the range of the respective remunerations, taking into account the different asset classes and financial instruments.

In the case of asset management and portfolio-based investment advice, if the exact amount of third-party remuneration cannot be determined in advance, the client shall be informed of the range of the expected remuneration in relation to the portfolio value and the agreed investment strategy.

E. Information about relationships with third parties

In connection with the financial services offered by the financial institution, economic ties may exist with third parties. The acceptance of payments from third parties as well as their treatment are regulated in detail and comprehensively in the respective investment advisory and portfolio management contracts.

F. Information on the market offer considered

The financial institution basically follows an «open universe approach» and tries to make the best possible choice for the client when selecting financial instruments. The financial institution's own collective investments can – where appropriate – be used in the portfolio management mandates or recommended as part of investment advice.

If the financial institution offers both its own and third-party financial instruments in its market offering, it shall take appropriate organisational measures, such as implementing a procedure for selecting financial instruments based on objective criteria customary in the industry. If the possibility of customers being disadvantaged cannot be excluded, the financial institution shall disclose this to its customers.

G. Appropriateness and suitability

Appropriateness test for transaction-based investment advice

In the case of transaction-based investment advice, the financial institution provides investment advice for individual transactions without taking into account the entire client portfolio.

In this case, the financial institution must ascertain the client's knowledge and experience before recommending financial instruments. In addition, before recommending financial instruments, it must be determined whether they are appropriate for the client.

In particular, the company must ensure that it is aware of the client's knowledge and experience in relation to each relevant investment category used in the financial service.

Suitability test for portfolio-based investment advice and asset management

When providing portfolio-based investment advice, the financial institution provides investment advice that takes into account the client portfolio. When providing asset management services, the financial institution must also take into account the entirety of the client portfolio it manages. In contrast to investment advice, it also makes the investment decision itself.

In both these cases, the financial institution must determine the financial circumstances and investment objectives as well as the knowledge and experience of the clients. In this context, the knowledge and experience relates to the financial service and not to the individual transactions.

The information gathered by the financial institution about the knowledge and experience of the clients must take account of the investment strategy, and the granularity of the survey must be adapted to the complexity and risk profile of the investment and the investment strategy. In particular, the financial institution must be certain about the knowledge and experience of the clients in relation to each relevant investment category used in the financial service.

H. Information about the continuation Asset Management and/ or Investment Advisory Services

In the event of an incapacity of the Executive Management, a qualified third party shall immediately assume, in collaboration with the remaining members of the Executive Management, the asset management and/or investment advisory services of the clients of the Company on a temporary basis and until a new permanent solution could be found. The qualified third party shall act in accordance with the delegation agreement. The qualified third party must be a licensed financial institution according to the FinIA.