



Federal Act on Financial Services (“FinSA”)

Information about Turicum Investment Management AG

Turicum Investment Management AG (hereinafter “TIM”) offers services in the field of asset management and investment advice and has its registered office at Blegistrasse 5, 6340 Baar. TIM is registered as a public limited company in the Swiss commercial register.

TIM is authorized by the Swiss Financial Market Supervisory Authority (FINMA) as an asset manager and is supervised by it in accordance with the Federal Act on Financial Institutions (FINIG) with the involvement of OSFIN Supervisory Organization Financial Service Providers, Florastrasse 44, CH-8008 Zurich, a supervisory organization. The provision of financial services by TIM is subject to the provisions of the Federal Financial Services Act (FIDLEG).

How can I get in touch with TIM?

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Primalgo.ch
Blegistrasse 5, CH-6340 Baar, +41 41 520 05 50, info@primalgo.ch
Further details on communication between the parties are contractually regulated individually.

Which contract and business conditions apply?

The rights and obligations between TIM and the client in connection with the provision of financial services are regulated in the individual service contract. This FinSA policy serves as supplementary information.

In which categories are the clients classified?

TIM has the obligation to allocate the clients to the segments of Private Client, Professional Client, or Institutional Client. The scope of the individual rules of conduct varies depending on the client segment. Unless otherwise agreed in writing, new clients are classified as Private Clients. Existing clients will only be notified if their pre-existing classification changes.

Private Client

A Private Client is considered to be anyone who cannot be clearly assigned to the professional or Institutional Client segment. By being classified as a Private Client, the client enjoys the highest level of protection provided by law.

Professional Client

Professional Clients are:

- Public corporations with professional treasury;
- Pension schemes and facilities that serve the purpose of providing occupational pensions, with a professional treasury;
- Companies with professional treasury;
- Large companies;
- Private investment structures with professional treasury set up for wealthy Private Clients.

A lower level of protection applies to a Professional Client than to a Private Client. In contrast to this, TIM may assume in the case of a Professional Client that the persons acting have sufficient experience, knowledge, and expertise to make investment decisions and to be able to adequately assess the associated risks and that the risks associated with the investment decisions for the clients are financially viable.

Furthermore, Professional Clients can waive the rules of conduct according to Art. 8, 9, 15, and 16 FinSA (duties to information, documentation, and accountability) being applied to them by TIM.

Institutional Clients

According to the law, only supervised legal entities such as financial intermediaries under the Banking Act (BankA), the Financial Institutions Act (FinIA), and the CISA, insurance companies under the ISA, foreign clients with equivalent prudential supervision, central banks and national and supranational public corporations with professional treasury. They benefit from the lowest level of protection. With regard to this client category, the rules of conduct pursuant to Art. 7 to 19 FinSA per se do not apply.

Change of client segment

There are the following options for changing the client segment:

- Private Clients can request a change of client classification as Professional Client at TIM at any time in writing if they meet at least one of the following criteria:
 - The client has on the basis of personal training and professional experience or comparable experience in the financial sector, the necessary knowledge to understand the risks of the investments and has assets of at least 500,000 Swiss francs;
 - The client has assets of at least 2 million Swiss francs;
- Pension funds and institutions with professional treasury that serve occupational pensions according to their purpose as well as companies with professional treasury can declare that they wish to be regarded as Institutional Clients rather than Professional Clients;
- Professional Clients may request to be reclassified to Private Clients;
- Institutional Clients may request to be considered Professional Clients.

Such change is also associated with a change in the level of protection applicable to the clients.

All declarations relating to the change of client segment must always be made in writing.

The client is obliged to inform TIM of any changes that could affect his classification. If TIM becomes aware that the client no longer meets the conditions of the client class in which the client is classified, TIM has the obligation to take action itself and adjust the client classification. TIM will inform the client immediately in this case.

What services are offered?

Asset management

Asset management is aimed at clients who wish to entrust the management of their assets to TIM in full within the framework of TIM's investment policy as well as individually defined and written criteria (investment strategy). The investment strategy takes into account the client's knowledge and experience as well as the client's investment objectives and financial circumstances. With an asset management agreement, TIM is authorized to make investments at its own discretion.

Investment

Investment advice is aimed at clients who wish to make recommendations with regard to transactions in financial instruments. In contrast to asset management, the respective investment decision is always made by the client himself. With an investment advisory contract, the decision-making power and thus ultimately the investment responsibility lies solely with the client. Custody accounts with investment advice may differ greatly in their orientation and structure from those with asset management. The law distinguishes between investment advice for individual transactions which does not take into account the entire client portfolio (transaction-related investment advice), and investment advice taking into account the client portfolio (portfolio-related investment advice).

What is Suitability or Appropriateness assessment?

In its assessment, TIM relies on the information provided by the client and assumes its accuracy. If the client does not or insufficiently provide the requested information and data, it is not possible for TIM to provide the services for the client in an appropriate manner.

Suitability assessment

In connection with portfolio-related investment advice and asset management, TIM must obtain various information from the client to ensure that TIM only makes investment recommendations or makes investment decisions that are suitable for the client (suitability assessment). This information shall include, where relevant, information on:

- Client's knowledge and experience of the agreed financial service;
- Client's investment objectives, including:
 - Information on the time horizon and purpose of the investment, the client's ability and willingness to take risks and any investment restrictions;
 - The financial circumstances of the client, including information about the nature and amount of the client's regular income, his assets, and his current and future financial obligations.

Based on this information, TIM creates a risk profile with the client and aligns with them an investment strategy.

Appropriateness assessment

In the case of transaction-related investment advice, TIM only has to check whether the investment recommendations are appropriate for the client and must obtain information about the client's knowledge and experience in the investment business (appropriateness assessment).

Presumption with Professional Clients

If a client is classified as a Professional Client, TIM assumes that the client in question has the necessary knowledge and experience and that the investment decisions or investment recommendations associated with financial risks are bearable for the client.

Representation relationships and joint accounts

When assessing the knowledge and experience of legal persons or in the presence of a power of attorney, TIM refers to the person acting against TIM. If the authorized person is only collectively authorized to sign, all persons concerned must have the necessary knowledge and experience. When assessing the financial situation and the investment objectives, TIM always focuses on the account holder. In the case of an account with two or more account holders, TIM always focuses on the person with the weakest financial circumstances or lowest risk capacity.

Which market offers does TIM take into account when selecting financial instruments?

When making investment recommendations or making investment decisions, TIM considers the entire investment universe accessible to it or the respective depository bank, and there are generally no restrictions. Deviating provisions are specified in the respective wealth management or advisory contracts.

General principles for managing conflicts of interest

TIM tries to protect and reconcile the interests of its clients, shareholders, and employees. Nevertheless, conflicts of interest cannot always be completely ruled out. In general, conflicts of interest may arise between TIM, its employees, and its clients, or between TIM's clients. In this context, TIM has taken the following organizational measures to deal with possible conflicts of interest:

- Measures to identify conflicts of interest (e.g. reporting and disclosure obligations);
- Measures to prevent the exchange of information to the extent that could be contrary to the client's interest ("Chinese walls");
- Functional separation of the organization and management of employees, where their main tasks could give rise to a conflict of interest between clients or between the interests of the clients and those of the Company;
- Measures to prevent staff who are simultaneously or immediately successively involved in different financial services from being assigned tasks that could affect the proper management of conflicts of interest;
- Design of a remuneration system that does not encourage disregard of legal obligations or harmful behavior toward clients;
- Adoption of rules for the acquisition and sale of financial instruments or other financial market transactions for the own account by employees.

Conflicts of interest, which cannot be avoided by these measures, are disclosed to the client before the service is provided.

Economic ties to third parties in particular

TIM has economic ties to third parties, which can lead to a conflict of interest in connection with the financial service. The possible conflict of interest arises from compensation from third parties (custodian banks, investment companies, or other product providers). This creates risks for clients in connection with higher rebates due to increased transaction volume. To mitigate the risks, TIM has taken the following precautions:

- TIM can only accept such compensation from third parties if the clients are expressly informed in advance and waive it, or the compensation is passed on in full to the clients.
- The remuneration policy for employees is designed in such a way that variable remuneration elements do not impair the quality of service to clients.
- No own financial products are used in contractual relationships with clients.

What are the costs?

In the course of executing the assignment to TIM, various costs arise. On the one hand, TIM invoices its fee according to the contractual agreement. On the other hand, additional service costs of third parties (e.g. depository fees), transaction costs (e.g. brokerage), and product costs in connection with the purchase or sale of financial instruments (e.g. issue premiums) also apply.

The client receives detailed information on the costs from his client advisor.

Who can the client contact in the event of a dispute?

TIM strives to always provide the best possible service for its clients. Should the client nevertheless be dissatisfied with the provision of services by TIM, he has the option of initiating mediation proceedings at the Financial Services Ombudsman (OFD), Bleicherweg 10, 8002 Zurich.

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