

## » *Information about FinSA and Ombudsman*

The Swiss Financial Services Act (FinSA) aims to strengthen investor protection and establish comparable standards for financial service providers. It requires that financial service providers introduce enhanced conduct rules and provide their clients with comprehensive information and documentation. Whenever required, Fisch Asset Management AG will complement its existing practices with FinSA measures, e.g. regarding the information and documentation processes when providing financial services to clients.

If you want to learn more about FinSA and how we implement the FinSA standards, please read our Information to clients on securities transactions or Information to clients on securities transactions for the European Union (MiFID). For your convenience, we have summarized the key information covered by FinSA as follows.

### **1. General information**

Fisch is a Swiss joint stock company with its registered office in Zurich. It is registered at the Commercial Registry Office of the Canton of Zurich under the number CHE-107.625.673 and is authorized to provide financial services as a non-account-holding securities firm by FINMA, the Swiss Financial Market Supervisory Authority.

The competent Swiss supervisory authority is:

Swiss Financial Market Supervisory Authority (FINMA)  
Laupenstrasse 27  
CH-3003 Bern  
Schweiz  
[www.finma.ch](http://www.finma.ch)

For the Federal Republic of Germany, Fisch has a writ of exemption ("Freistellungsverfügung") (ID: 121756) from BaFin, the Federal Financial Supervisory Authority.

The competent German supervisory authority is:

Bundesanstalt für Finanzdienstleistungsaufsicht  
Graurheindorfer Str. 108  
D-53117 Bonn  
[www.bafin.de](http://www.bafin.de)

Fisch further maintains a local subsidiary licensed as Financial investment agent (Finanzanlagenvermittler) according to § 34 f par 1 number 1 German trade regulations (Gewerbeordnung GewO) for distribution of its products in Germany.

Company name, address and contact information:

Fisch Asset Management GmbH  
Niedenau 45  
DE-60325 Frankfurt  
Deutschland

Tel.: +49 (0)69 2561 2968 1 +49 (0)69 2561 2968 2  
+49 (0)174 3177 665  
E-mail: gudrun-nagel@fisch-am.com rik-verhoeven@fisch-am.com

Supervising authority:

Industrie- und Handelskammer Frankfurt am Main  
Börsenplatz 4  
60313 Frankfurt am Main

Fisch distributes collective investment schemes and provides asset management services. As a non-account-holding securities firm, it does not hold any financial instruments or cash for its clients.

## 2. Client segmentation

Fisch provides securities services exclusively to professional clients and institutional clients, but Fisch does not introduce a separate class for institutional clients and grants institutional clients the same level of protection as professional clients.

Non-professional clients must undertake a recategorization as professional clients (opting-out) in order to receive service provision by Fisch. They have to submit the document “recategorization of non-professional clients as professional clients for the purpose of FinSA”.

### 3. Information on financial instruments, investment strategies and risks

Only the types of assets listed in this section are contained in the investment vehicles managed by Fisch. Fisch specializes in the following assets:

- Convertible bonds
- Corporate bonds
- Absolute Return

You will find additional information, including a general description of the investment strategies by type and the risks they entail, as well as information on the risks associated with the complex and/or non-complex financial instruments used to implement the investment strategies and any benchmarks tracked in the course of asset management, in the document “Risk classification of investment strategies”.

The brochure “**Risks Involved in Trading financial Instruments**” of the Swiss Bankers Association (SBA) contains general information on typical financial services and on the characteristics and risks of financial instruments.

#### 4. Order execution principles

Fisch does not engage in proprietary trading and will never trade on its own account for client portfolios. Every client portfolio transaction has a third-party counterparty.

Fisch has established order execution principles governing the provision of the securities services described in the **information to clients on securities transactions**.

#### 5. Fees and ancillary costs

A cost overview containing information on the fees and ancillary costs associated with the securities services provided by Fisch, including a representation of their cumulative effects on client portfolios, to the extent required by the regulations in force can be found in the subsequent **generic ex-ante cost overview**. If you wish to receive an overview of your personal costs and fees, your relationship manager is happy to assist you.

#### 6. Handling of conflicts of interest

Fisch is always required to act in an honest, fair and professional manner in its clients' best interests when providing securities services. Fisch applies appropriate precautionary measures, on the one hand, to avoid situations that could lead to conflicts of interest and, on the other hand, which ensure that client interests are not negatively impacted by any conflict with the interests of Fisch or any directly or indirectly affiliated natural person or legal entity.

Further information on this topic can be found in the **Information to client on securities transactions**.

#### 7. Swiss Ombudsman

Fisch endeavors to continuously improve its products and services. If, despite those efforts, differing views arise in relation to a matter and if, despite you having made a complaint, a mutually agreeable solution could not be found, you have the option of taking the matter to Fisch's ombudsman.

Wherever possible, any legal disputes between Fisch and clients should be settled through a mediation procedure before an ombudsman. This procedure is confidential and free of charge to the client.

Clients can file a mediation request with Fisch's ombudsman below if they are unsatisfied with the performance of the contract by Fisch and if no agreement could be reached directly with Fisch.

Fisch is affiliated with the Swiss Ombudsman service for financial service providers FINOS.

Finanzombudsstelle Schweiz (FINOS)

Talstrasse 20

CH-8001 Zurich

Switzerland

Tel.: +41 (0)44 552 0800

E-mail: [info@finos.ch](mailto:info@finos.ch)

Website: [www.finos.ch](http://www.finos.ch)