

### **GENERAL INFORMATION SHEET**

# 1. General Information about the Bank

Entity name: Banca Zarattini & Co. SA

Legal form: Corporation

Commercial register number: CHE - 106.778.073

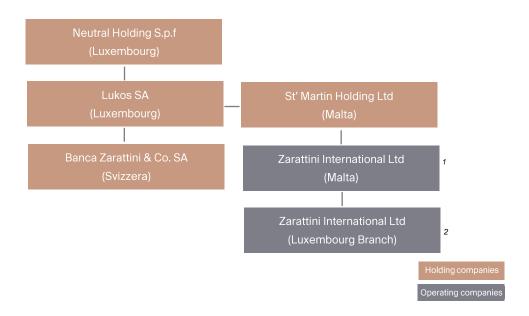
Registered office: Via Serafino Balestra 17 - CH 6900 Lugano (Switzerland)

Phone: +41(0)912608585

Fax: +41(0) 91 260 85 90

Website: The Bank has its own website, <u>www.bancazarattini.ch</u>, where information is made available about the Bank, the Financial Group to which it belongs, and the financial and banking services it offers.

*Group Organization Chart:* The following is a graphic depiction of the current composition of the financial group to which the Bank belongs, included in the consolidated supervisory perimeter.



<sup>&</sup>lt;sup>1</sup> Zarattini International Ltd is regulated by the MFSA and authorized under the Investment Services Act. Holds a Depository Licence and Investment Firms Licence, authorizing the Company to provide Investment Services and to act as Depository to Collective Investment Schemes.

<sup>&</sup>lt;sup>2</sup> Zarattini International Ltd, Luxembourg Branch is regulated by the CSSF and authorised under the notification procedure pursuant to Directive 2014/65/EU on MiFID. Holds a Depository Licence and Investment Firms Licence, authorising the Company to provide Investment Services and to act as Depository to Collective Investment Undertakings.



Authorizations: Banking license, Securities brokerage license, free to provide banking services in Italy.

Supervision: Subject to FINMA (Swiss Financial Market Supervisory Authority) supervision.

Postal address:

Swiss Financial Market Supervisory Authority (FINMA)

Laupenstrasse 27CH - 3003 Bern

Telephone number and e-mail address:

Phone: +41 31 327 91 00 Fax: +41 31 327 91 01

E-mail: info@finma.ch

Head office:

Swiss Financial Market Supervisory Authority (FINMA)

Laupenstrasse 27CH - 3003 Bern

Website: www.finma.ch

The list of banks and securities brokers authorized by FINMA can be found at the following URL: <a href="https://www.finma.ch/it/finma-public/istituti-persone-e-prodottiautorizzati/">https://www.finma.ch/it/finma-public/istituti-persone-e-prodottiautorizzati/</a>

#### 2. Methods of Communication

The Client may communicate with the Bank in Italian and English. The Bank communicates with its Clients in Italian or English. The methods of communication between the Client and the Bank are governed by the "General Conditions of the Bank" and in the appropriate forms signed by the Client. It is always possible to communicate with the Bank by postal channel, telephone and fax at the references indicated above.

# 3. Complaints

The Client may send any complaints in writing or electronically to the attention of the Complaints Office of the Bank.

In writing, it may be sent by registered mail to the registered office in via Serafino Balestra 17, CH 6900 Lugano; via fax to +41(0)912608590; or electronically via e-mail to <a href="mailto:guestioning@zarattinibank.ch">guestioning@zarattinibank.ch</a>.

### 4. Mediation Procedure

For complaints in which no mutual agreement can be reached with the Bank, you may contact the Swiss Banking Ombudsman. It is the competent mediation body for our organization, and also a neutral conciliation and information body, whose services are free of charge.

Swiss Banking Ombudsman Bahnhofplatz 9 P.O. Box 8021 Zurich



#### www.bankingombudsman.ch

As a rule, banking mediation is only triggered once a written complaint is filed by the Client and the Bank has taken a position accordingly.

### 5. Client Classification

In compliance with Art. 4 of the Financial Services Act (FinSA), the Bank is obliged to divide Clients into the following categories: Private Clients, Professional Clients, and Corporate Clients.

The classification is based on the individual financial situation of the Client, namely on its level of knowledge, experience and financial competence; on the size of the legally established enterprise; or by the presence of a professional treasury. Individuals, as well as small- and medium-sized enterprises are generally classified as Private Clients, whereas large companies, pension funds and financial intermediaries as Professional Clients.

Under certain conditions, the Client may submit a request to change the initial Private Client classification. In order to make this change, you are encouraged to reach out to your Client Advisor.

The different categories of Client classification correspond to **different obligations and Client-protective measures that the Bank is required to adopt, depending on the** financial service requested by the Client, as better set out in the table below.

**Private Clients** represent the category to which the law reserves the highest level of protection, both in the pre-contractual phase as well as in the phase of investment service delivery, as it is considered that this category possesses less experience, knowledge and expertise in the investment area for making informed investment choices without the support of an intermediary. Private Clients are identified, by way of exclusion, as all investors that the legislation does not define as Professional or Corporate Clients.

**Professional Clients** are those who the legislation believes to possess the experience, knowledge and expertise necessary to make their investment choices in an informed manner by evaluating the associated risks.

With regard to such Clients who, by virtue of the foregoing, require a level of protection lower than that afforded to Private Clients, the protection obligations provided for by current legislation on the part of the financial intermediary are reduced.

**Corporate Clients** are those who possess the highest level of investment experience, knowledge and expertise and, therefore, require the lowest level of protection when the Bank provides them with order execution, independent trading, and/or order receipt and transmission services.

**Qualified Investor Status:** The new Collective Investment Schemes Act (CISA) defines *Qualified Investor Status* mainly with respect to the Client Classification provided for by FinSA. Professional and Corporate Clients are considered Qualified Investors. Private Clients are not considered to be Qualified Investors; therefore they do not have access to collective investment schemes (investment funds) reserved for Qualified Investors and cannot invest in collective investment schemes (investment funds) not authorized in Switzerland. It should be noted, however, that the signing of a management or advisory mandate in favor of the Bank automatically confers the status of Qualified Investor (unless Qualified Investor Status is expressly waived). Private Clients may also request in writing to change their classification to Professional Clients, provided that they



meet the required conditions. CISA provides for the possibility of **changing classification** via written request to a financial service provider and provided that the established conditions are met.

Switching to a category that offers less protection (opting-out): A wealthy Private Client or a private investment structure created for such Clients and not equipped with a professional treasury may apply to be considered a Professional Client. This request is admissible in the following situations: The person or structure (i) has assets of at least CHF 500,000; and (ii) has the necessary knowledge to understand the risks of investments through personal training and professional experience or comparable experience in the financial sector; or the person or facility has assets of at least CHF 2 million. The above amounts are calculated by excluding assets (including real estate, claims on social security institutions or occupational pension assets). A Swiss or foreign collective investment scheme (or its management company), which is not subject to prudential supervision, may apply to be considered a Corporate Client.

As soon as they have a professional treasury, companies, pension funds and other institutions dedicated to occupational pensions can apply to be considered Corporate Clients.

**Switching to a category that offers more protection (***opting-in***):** A Professional Client can request to be considered a Private Client. A Corporate Client may request to be considered a Professional Client.

#### 6. Financial Services Information

The Bank provides different types of financial services, including, in particular:

**Asset Management:** On the basis of an asset management mandate, the Client entrusts the Bank with its assets so that the Bank manages them according to the parameters defined in the investment profile for the management mandate. For this type of mandate, it is the Bank that makes the investment decisions.

**Full Portfolio Investment Advice:** The Bank provides this service within the framework of an investment advisory contract that takes into account the Client's entire portfolio according to the parameters defined with the Client in an investment profile for the investment advisory mandate. For this type of service, the Bank recommends one or more financial instruments and the Client makes the final investment decision.

**Individual Product Investment Advice:** The Bank provides this service within the framework of an individual product investment advisory contract, in accordance with the Client's knowledge of the product. For this type of service, the Bank carries out analysis and may, from time to time, recommend or advise against a financial instrument, but it is always the Client who makes the final investment decision.

Execution Only: The Client issues an investment order and the Bank executes it.

The granting of loans for transactions with financial instruments: the client, whether they are a management, consultancy, or execution-only client, may request a loan against the pledging of assets held in order to increase their investments (leverage). The maximum utilization will depend on the performance of the pledged assets and the advance margins applied by the Bank to the various financial products.

### 7. Fee Information

The Bank shall inform its Clients of the fees associated with the financial and banking services it provides. This information is provided at the time of account opening via the delivery of the "Financial Conditions" document, which is an integral part of the



"General Conditions of the Bank". The fees and charges applied to Clients are generally indicated in the attachment to the individual contracts governing the services provided by the Bank. A copy of the contracts is always available to the potential Client who, at any time, may request a copy from the Bank, free of charge or, in any case, to view these documents within a reasonable time ahead of execution of the investment and ancillary banking services contract.

Given its freedom to negotiate, the Bank may agree with the potential Client on the commission and fees applicable to its various services. Differences in commission may depend on various factors, both objective and subjective, that the Bank works to define in personal negotiations with the Client, respecting commercial and equitable criteria. Given the variability of the market prices of financial instruments, it is not possible to provide these fees now, it being understood that this will be made known at the time of each request by the Client, who is warned that, normally, the basis of calculation is the current stock market value for securities traded on regulated markets.

Information on fees and charges shall be provided to the Client, and it includes items relating to the investment or ancillary service provided; the cost of any advice and the financial instrument recommended or offered for sale; and the methods of payment by the Client, including any payments made by third parties.

More information on the costs associated with a financial instrument can be found in the "Basic Product Information Sheet" or in the prospectus, if this documentation is available for the type of instrument in question.

In any case, the costs related to the transactions are indicated in the respective notice.

# 8. Risk Information

Transactions with financial instruments are associated with opportunities and risks. It is therefore important to know and understand these risks before acquiring a financial service.

General information on the risks of the Bank's investments and the financial instruments used is available in the "Risks Associated with Financial Investments" document. Before proceeding with an investment activity, it is always advisable to take this information into account. Your Client Advisor remains available for any questions. In addition, upon request, the Bank provides the Client with the Swiss Bankers Association's "Risks Involved in Trading Financial Instruments" in-depth booklet.

# 9. Existing Financial Obligations with Third Parties in Relation to the Financial Services Offered

The Bank may have financial relationships with third parties which may generate benefits and/or remuneration. In this context, the Bank has implemented a directive aimed at avoiding conflicts of interest, available on request and, in any case, published in the Costumer Area on the Bank's website.

Please note that the general information contained in this document is not exhaustive and may be updated and/or expanded from time to time.