

Zurich, November 2021

## **Regulatory Information for Clients of Alpinum Investment Management AG**

### **1. Introduction**

This letter contains important information about the Swiss Federal Act on Financial Services (FinSA), which came into force on January 1, 2020. It reflects the implementation by Alpinum Investment Management AG in the current organizational culture as well as the current services.

FinSA aims to provide greater protection for investors and create comparable standards for financial service providers. Several areas of the new law are subject to a transition period of up to two years, which means that the FinSA must be fully implemented by January 1, 2022 at the latest. FinSA requires that financial service providers introduce extended rules of conduct and provide their clients with comprehensive information and documents. Among other things, the new law sets out the requirements for the provision of financial services (rules of conduct), for the internal organization of financial service providers (organization) and for the offering of financial instruments (product transparency).

This information sheet is intended to inform customers about the implementation of the new regulatory standards such as customer classification, conflicts of interest, compensation, general risks, and the handling of complaints. It is for informational purposes only, has been prepared for regulatory purposes and does not serve any marketing purposes. It does not constitute an invitation to purchase a financial service or an offer to buy or sell a financial instrument.

Alpinum Investment Management AG exclusively addresses professional and institutional clients. In exceptional cases, Alpinum Investment Management AG also offers its services to high-net-worth individuals and their investment structures who wish to be considered professional clients (opting out).

For any further information, please do not hesitate to contact the staff of Alpinum Investment Management AG.

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## **2. Information Alpinum Investment Management AG**

Alpinum Investment Management AG (hereinafter "AIM") is a Swiss manager of collective assets pursuant to Art. 24 para. 1 of the Federal Act on Financial Institutions. It is domiciled in Zurich and was founded in 2014. Its core competencies include alternative investments, including direct lending and traditional credit instruments, customized portfolio solutions and hedge funds. AIM manages a range of investment funds with a focus on long-term capital appreciation and risk management. Its investors are mainly family offices, asset managers, banks and pension funds. AIM has approximately USD 2 billion in assets under management.

AIM is licensed as a manager of collective assets by the Swiss Financial Market Supervisory Authority (FINMA).

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## **3. Client Segmentation**

As a financial services provider, AIM is required by law to allocate its clients to one of the following three client segments:

- Retail clients
- Professional clients
- Institutional clients

AIM complies with this client segmentation obligation when opening a new business relationship or when providing a financial service.

## **4. Financial Services**

The purpose of AIM is asset management for domestic and foreign collective investment schemes. AIM also provides individual investment advisory services to institutional and professional clients in Switzerland and abroad. AIM is active in the field of offering financial instruments, whereby the offer mainly relates to collective investments managed by AIM.

## **5. Conflict of Interest**

In connection with the provision of financial services, conflicts of interest may arise between the individual parties. AIM has taken appropriate measures to protect the interests of its clients and has laid these down in its internal directives.

AIM does not accept commissions, fees or other monetary or non-monetary benefits from third parties in connection with its asset management or investment advisory activities. If, in exceptional cases, such third-party benefits accrue to AIM, they are passed on in full within a reasonable period to the collective investment schemes managed by AIM and thus indirectly for the benefit of the client again. In the case of discretionary asset management and investment advisory mandates, such third-party remuneration is also passed on to the client. Non-monetary benefits (e.g. participation in seminars and conferences, educational events, etc.) can only be accepted if they are of a minor nature and enhance the quality of the service. To ensure the independence of AIM's investment decisions and to avoid potential conflicts of interest, AIM pays for any research services itself.

AIM generally follows an 'open universe approach' and tries to make the best possible choice for the client when selecting financial instruments.

## **6. Costs in connection with financial services**

All costs and fees in connection with the financial services and products offered can be found in the relevant fund prospectuses or fund fact sheets. All documents are available free of charge on the AIM website ([www.alpinumim.com](http://www.alpinumim.com)). For individual asset management and investment advisory mandates, the costs associated with the financial service are disclosed in the respective contracts.

## **7. Risk Information**

Transactions involving financial instruments are associated with opportunities and risks. The risks associated with the acquisition of fund units are described in detail in the fund prospectuses. In the case of individual asset management and investment advisory mandates, the risks are disclosed to the extent required by law in the respective contracts. The risks associated with the financial services and financial instruments are explained to customers in each case before the contract is concluded. Further detailed information on this subject can be found in the brochure 'Risks in Trading with Financial Instruments' published by the Swiss Bankers Association ([www.swissbanking.ch](http://www.swissbanking.ch)).

## **8. Participation in and economic ties to third parties**

There are no economic ties of AIM to third parties that could lead to a conflict of interest vis-à-vis customers in connection with the provision of financial services.

## **9. Information on the market offer considered**

When providing financial services, AIM considers financial instruments of third parties as well as financial instruments managed or offered by it or by companies affiliated with it. The Company informs its clients within the framework of the respective contractual relationships about the use of such "own" financial instruments according to Art. 10 para. 2 of the Financial Services Ordinance.

## **10. Ombudsman's Office**

FinSA aims to intend for the mediation of legal disputes between clients and financial service providers by an ombudsman. For this reason, AIM has joined the following ombudsman's office recognized by the Federal Department of Finance:

Finanzombudsstelle Schweiz (FINOS)  
Talstrasse 20  
CH-8001 Zurich  
Switzerland  
T: +41 44 52 08 00

## **11. Contact**

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