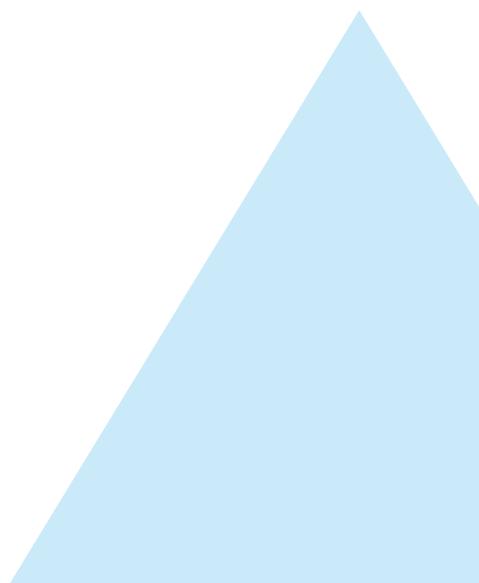




FINSA INFORMATION BROCHURE

December 2021



FinSA Information Brochure of IMM Wealth Management AG ("IMM")

Table of Content

1. Introduction	3
2. General information about the financial institution	4
2.1 Contact details	4
2.2 Field of Activity & Supervisory status	4
3. Professional Secrecy	4
4. Economic ties to third parties	4
5. Dormant Assets	4
6. Financial services provided by IMM	5
6.1 Discretionary mandate	5
6.1.1 Scope of activity	5
6.1.2 Rights and obligations	5
6.1.3 Risks	5
6.1.4 Market offering taken into account	6
6.2 Portfolio-related Investment Advice	6
6.2.1 Scope of Activity	6
6.2.2 Rights and obligations	6
6.2.3 Risks	7
6.2.4 Market offering taken into account	8
6.3 Execution Only	8
6.3.1 Scope of Activity	8
6.3.2 Rights and obligations	8
6.3.3 Risks	9
7. Handling of Conflicts of Interest	9
7.1 General principles	9
7.2 Third-party inducements	10
7.3 Additional information	10

1. Introduction

The purpose of this brochure is to fulfil our disclosure obligations under the Financial Services Act (FinSA) and to provide you with an overview of our business activities.

The latest version of this brochure and further information can be found on our website at <https://immwealth.com/regulatory/>.

FinSA primarily governs the provision of financial services and the offering of financial instruments and aims to strengthen the protection of clients. In terms of content, FinSA is closely aligned with European regulatory reforms and essentially covers the following areas:

- Increasing client protection
- Transparency in relation to financial products
- Organisational requirements for the provision of financial services.

The introduction of FinSA will lead to more extensive obligations regarding information and the duty to keep records for financial services providers in Switzerland that offer financial services in connection with financial instruments (e.g., portfolio management and investment advisory). The organisational measures to be taken by financial services providers are also being expanded.

The level of protection to be granted by a financial services provider depends on the respective client classification. The client classification determines the scope of the applicable rules of conduct and/or organisational measures to be applied to the client relationship in question.

This FinSA information brochure provides you with an overview of the implementation of the FinSA requirements by IMM. It supplements every contractual agreement between the client and IMM. In the event of contradictions, the respective contractual agreement takes precedence. For information about the risks generally associated with financial instruments, please refer to the brochure Risks Involved in Trading Financial Instruments issued by the Swiss Bankers Association (SBA).

FinSA came into force on 1 January 2020. IMM makes use of the two-year transition period granted by law to comply with the rules of conduct and organisational measures in accordance with FinSA. The Code of Conduct and organisational measures will therefore be implemented on 1 January 2022.

Should you require any further information, please contact IMM by using the contact details as stated below in art. 2.1.

2. General information about the financial institution

2.1. Contact details

Address	IMM Wealth Management AG Poststrasse 30 CH-6300 Zug Switzerland
Tel.	+41 43 501 05 10
E-mail	info@immwealth.com
Website	http://immwealth.com
Commercial register no	CHE-114.717.139

2.2. Field of Activity & Supervisory status

IMM provides individual portfolio management and investment advisory activities and is a member of the Swiss Self-Regulatory Organization PolyReg and as such, subject to its rules of professional and ethical conduct.

IMM is currently in the process to obtain the license as a portfolio manager in accordance with art. 17 FinIA.

IMM is a member of the Financial Services Ombudsman Association (OFD), Bleicherweg 10, 8002 Zurich, recognized ombudsman of the Federal Finance Department.

3. Professional Secrecy

IMM is subject to professional secrecy in accordance with the Financial Institutions Act (FinIA).

4. Economic ties to third parties

IMM has economic ties to third parties which may lead to a conflict of interest. This concerns payments received from third parties. The third parties are issuers of products or external brokers. For clients, this gives rise to the risk that such third parties are given preferential treatment on the basis of their remuneration. To mitigate these risks, IMM has taken several precautions i.e., by establishing internal directives that clearly regulate the handling of conflicts of interest.

5. Dormant Assets

It happens that contacts with clients are broken off and the assets subsequently become dormant. Such assets can be permanently forgotten by clients and their heirs. The following is recommended to avoid loss of contact or dormant assets:

- **Changes of address and name:** Please notify us immediately in the event of a change of residence, address or name as well as changes of e-mail address and telephone numbers
- **Special Instructions:** Please inform us about longer absences and about a possible redirection of correspondence to a third-party address or withholding of correspondence as well as on the availability in urgent cases during the availability in urgent cases during this time
- **Granting of Powers of Attorney:** It may be advisable to designate an authorized person to whom IMM can approach in the event of a break in contact

- **Orientation of trusted persons and testamentary disposition:** Another way to avoid a lack of contact and news is to inform a trusted person about the relationship with IMM. However, IMM may only communicate with such a person of trust if he or she has been authorized to do so in writing. Furthermore, the assets concerned may be mentioned, for example, in a testamentary disposition.

Further information can also be found in the brochure "Dormant Assets" of the Swiss Bankers Association. The brochure is available on the Internet.

6. Financial services provided by IMM

6.1. Discretionary mandate

6.1.1. Scope of activity

Regarding the discretionary management of assets, IMM manages in the name of, for the account of and at the risk of the client, assets that the client has deposited with a custodian bank. IMM carries out transactions at his own free discretion and without consulting the client. In doing so, IMM ensures that the transaction carried out by him is in line with the client's financial circumstances and investment objectives, and with the objectives of the client and the investment strategy agreed with the client and ensures that the portfolio structuring is suitable for the client.

6.1.2. Rights and obligations

The client has the right to the appropriate management of the assets in his portfolio. To achieve this, IMM selects the investments to be included in the portfolio with due care within the framework of the market offer taken into account. IMM shall ensure an appropriate distribution of risk to the extent permitted by the investment strategy. IMM regularly monitors the assets and ensures that the investments are in line with the investment strategy agreed in the investment profile and are suitable for the client.

IMM shall regularly inform the client about the asset management agreed upon and provided.

6.1.3. Risks

In the context of discretionary mandates, the following risks arise in principle, which lie in the risk sphere of the client and are therefore borne by the client:

- **Risk of selected investment strategy:** Different risks may arise from the investment strategy selected and agreed upon by the client (see below). The client bears these risks in full. A presentation of the risks and a corresponding risk explanation are provided before the investment strategy is agreed
- **Asset preservation risk:** The risk that the financial instruments in the portfolio may lose value. This risk, which may vary depending on the financial instrument, is borne in full by the client. For the risks of the individual financial instruments, please refer to the brochure "Risks in Trading with Financial Instruments" of the Swiss Bankers Association (see above)

- **Information risk:** The risk that IMM has too little information to make an informed investment decision. When managing assets, IMM takes into account the client's financial circumstances and investment objectives (suitability test). Should the client provide IMM with insufficient or inaccurate information regarding his financial circumstances and/or investment objectives, there is a risk that IMM will not be able to make investment decisions that are suitable for the client.

Furthermore, the discretionary asset management gives rise to risks that lie within IMM's sphere of risk and for which IMM is liable to the client.

IMM has taken appropriate measures to counter these risks, in particular by observing the principle of good faith and the principle of equal treatment when processing client orders.

6.1.4. Market offering taken into account

The market offering taken into account in the selection of financial instruments includes third-party financial instruments. The following financial instruments may be used in the context of discretionary mandates:

- Securities
- Cash
- Governmental or corporate bonds
- Debt obligations
- Gold and gold related assets
- Various currencies, bank notes and similar bank obligations
- Participation certificates and similar bank issued paper,
- Stocks, bonds, warrants or options,
- Investment funds even if controlled by IMM or any other related entity
- Futures or future investment funds
- Non-traditional or alternative funds
- Digital currencies

6.2. Portfolio-related Investment Advice

6.2.1. Scope of Activity

Investment advice is considered to be the provision of personal recommendations on transactions with financial instruments. Within the scope of portfolio-related investment advice, IMM advises the client on transactions with financial instruments, taking into account the client's entire portfolio. Depending on the client segment, this takes place in accordance with the results of the suitability test. Clients then decide for themselves whether they wish to follow the recommendation of the company.

6.2.2. Rights and obligations

Portfolio-related investment advice can be provided at agreed intervals at both the client's and IMM's initiative, depending on the agreement with the client. IMM undertakes to advise the client to the best of its knowledge and belief and with the same diligence that it would exercise in its own affairs.

6.2.3. Risks

Generally speaking, portfolio-related investment advice involves the following risks which lie in the client's risk sphere and are therefore borne by the client:

- **Risk of selected investment strategy:** Various risks may arise from the investment strategy selected by the client and agreed with IMM (see below). These risks are borne in full by the client. The risks and corresponding risk disclosure are presented before the investment strategy is agreed
- **Risk of loss in value:** The risk of the financial instruments in the portfolio declining in value. This risk, which may vary depending on the financial instrument, is borne entirely by the client. Please refer to the brochure "Risks Involved in Trading Financial Instruments" issued by the Swiss Bankers Association for information on the risks inherent in individual financial instruments
- **Client's information risk** or the risk that the client may not have enough information to make an informed investment decision: although IMM takes account of the portfolio when providing portfolio-related investment advice, the client makes the investment decisions him-/herself. The client accordingly needs specialist knowledge to understand the financial instruments. Should the client provide insufficient or inaccurate information about his/her financial knowledge, there is a risk that he/she will fail to follow the investment recommendations suitable for him/her due to his/her lack of or inadequate financial knowledge
- **Risk in terms of timing when placing an order** or the risk that the client will issue a buy or sell order too late after being advised, which may lead to price losses. The recommendations given by IMM are based on the market data available at the time of advice and, due to market dependency, are only valid for a short period of time
- **Portfolio manager's information risk** or the risk that the investment advisor may not have sufficient information to make a suitable recommendation. When providing portfolio-related investment advice and depending on the client segment, IMM considers the client's financial situation, investment objectives (suitability test) and needs. Should the client provide IMM with insufficient or incorrect information regarding his/her financial situation, investment objectives or needs, there is a risk that IMM may not be able to provide the client with appropriate advice

Furthermore, comprehensive investment advice gives rise to risks which lie within the risk sphere of IMM and for which IMM is liable vis-a-vis the client.

IMM has taken appropriate measures to counter these risks, in particular by observing the principle of good faith and the principle of equal treatment.

6.2.4. Market offering taken into account

The market offering taken into account in the selection of financial instruments includes third-party financial instruments. The following financial instruments may be used in the context of investment advisory mandates:

- Securities
- Cash
- Governmental or corporate bonds
- Debt obligations
- Gold and gold related assets
- Various currencies, bank notes and similar bank obligations
- Participation certificates and similar bank issued paper,
- Stocks, bonds, warrants or options,
- Investment funds even if controlled by IMM or any other related entity
- Futures or future investment funds
- Non-traditional or alternative funds
- Digital currencies

6.3. Execution Only

6.3.1. Scope of Activity

Execution Only shall mean all financial services that relate to the mere transmission of client orders by IMM without any advice or management. In the case of Execution Only orders are exclusively initiated by the client and transmitted by IMM.

IMM does not check whether the transaction in question is in line with the client's knowledge and experience (appropriateness) as well as the financial circumstances and investment objectives of the client (suitability). In connection with future placing of an order by the client, IMM will not point out again that no appropriateness and suitability check will be carried out.

6.3.2. Rights and obligations

In the case of Execution Only, the client has the right to place orders to buy or sell financial instruments within the scope the market offer taken into account. IMM has the duty to transmit the orders for execution with the same with the same diligence that he uses in his own affairs.

IMM informs the client without delay of all material circumstances that could affect the correct processing of the order. Furthermore, IMM informs the client regularly on the orders agreed upon and executed.

6.3.3 Risks

Execution Only generally gives rise to the following risks, which lie in the client's sphere of risk and are therefore borne by the client:

- **Substance preservation risk** or the risk that the financial instruments in the portfolio lose value: This risk, which can vary depending on the financial instrument, is borne entirely by the client. For the risks of the individual financial instruments, please refer to the brochure "Risks in trading with financial instruments" of the Swiss Bankers Association
- **Information risk on the part of the client** or the risk that the client has too little information to make an informed investment decision. In the case of Execution Only, the client makes investment decisions without the assistance of IMM. Accordingly, the client needs specialist knowledge to understand the financial instruments and time to familiarize himself with the financial markets. If the client does not have the necessary knowledge and experience, he runs the risk that he invests in a financial instrument that is inappropriate for him. A lack of or inadequate knowledge could also lead to the client making investment decisions that are not in line with his or his or her financial circumstances and/or investment objectives
- **Risk with regard to the timing of the placing of orders** or the risk that the client may have chosen a bad time for placing the order, which leads to price losses
- **Risk of insufficient monitoring** or the risk that the client does not monitor his portfolio or monitors it insufficiently. IMM does not have any monitoring, warning or clarification obligation at any time. Inadequate monitoring by the client may be associated with various risks, such as cluster risks.

Furthermore, Execution Only gives rise to risks which lie within the portfolio manager's sphere of risk and for which the portfolio manager is liable to the client.

IMM has taken appropriate measures to counter these risks, in particular by observing the principle of good faith and the principle of equal treatment when processing client orders.

7. Handling of Conflicts of Interest

7.1. General principles

Conflicts of interest may arise if IMM:

- in breach of good faith, obtains a financial benefit for himself at the expense of clients or avoid a financial loss to the detriment of clients
- has an interest in the outcome of a financial service provided to clients that is contrary to that of the clients

- has a financial or other incentive in the provision of financial services to place the interests of certain clients over the interests of other clients
- accepts an inducement in the form of financial or non-financial benefits or services from a third party in breach of good faith in relation to a financial service provided to the client

In doing so, conflicts of interest may arise in connection with execution only, investment advice, and discretionary management. In particular, they arise from the occurrence of:

- multiple client orders
- client orders with the portfolio manager's own business or other own interests or
- client orders with transactions of the portfolio manager's employees.

To identify conflicts of interest and to prevent them from having a detrimental effect on the client, IMM has issued internal directives and taken organizational precautions.

7.2 Third-party inducements

In the context of the provision of financial services, the portfolio manager may accept compensation from third parties.

If this is the case, IMM informs his clients about the type, the extent, the calculation parameters and the ranges of compensations by third parties which may accrue to the portfolio manager in the provision of the financial service. The client waives the third-party compensation, and IMM retains it.

IMM has taken appropriate internal measures in order to avoid conflicts of interest arising from this.

7.3 Additional information

For further information on possible conflicts of interest in connection with the services provided by IMM and the precautions taken to protect the client, IMM will be pleased to provide you with the respective information upon request.