

## Client information on the Financial Services Act (FINSA)

*The new Federal Financial Services Act (FINSA) came into force in Switzerland on January 1, 2020. On the one hand, it contains regulatory provisions on the offering of financial services and financial products and, on the other, protective mechanisms for investors. Even before the FINSA came into force, Aquila Ltd and its partner companies attached great importance to protecting the interests of their clients. Based on the new legislation, the existing processes were further revised and adapted to the requirements of the FINSA where necessary within the transition periods provided. Below, we summarize the most important information for you.*

### About us

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Rubin Overseas Ltd. (hereinafter «the company») is an independent asset management company domiciled in Zurich. It holds a license from the Swiss Financial Market Supervisory Authority (FINMA) as an asset manager within the meaning of Art. 17 para. 1 FINIA and is directly supervised by FINMA.

As a partner company of Aquila Ltd, the company can draw on specific expertise in the areas of legal, compliance & risk, accounting and IT (outsourcing). Aquila Ltd has a banking license and is also supervised by FINMA.

### Our services

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To our clients, we offer services in the fields of discretionary asset management, investment advice and the sole transmission of orders (execution only). In addition, we provide other family office services on request, such as the consolidation of additional custody accounts, administrative support in cooperation with custodian banks, etc. Our license further allows us to manage occupational pension assets as well as fund assets up to CHF 100 million. We also have the ability to structure products and act as asset managers for certain certificates (derivatives).

All the services we offer and the corresponding costs are described in detail in the mandate agreement.

### Conflicts of interest

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As part of our service, we consider a comprehensive range of products and services, which is limited by selection processes that are tried and tested and suited to your needs. For this purpose, we can also draw on research material from third parties (e.g. custodian banks). We strive to exclude conflicts of interest wherever possible and otherwise disclose them transparently. If research material from third parties is used and taken into account in the implementation of the investment strategy, this is done exclusively after careful examination and selection from the entire market offering considered in your best interest.

All our employees are bound by our internal code of conduct, which ensures that the needs of our clients are paramount. For further information we are of course at your disposal.

### Client segmentation

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An important element of client protection in the FINSA is the segmentation of clients into investor protection classes. We divide them into three segments: private clients, professional clients, and institutional clients. Private clients enjoy the highest level of investor protection.

Unless you are informed otherwise, you are classified as a private client. Of course, you can request that your classification under FINSA be changed at any time. We will then discuss with you the possible alternatives and the associated requirements.

## ***Ombudsman***

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If, following a written complaint from you to the company, a conflict arises that cannot be settled bilaterally, you can turn to the ombudsman's office. The aim of the ombudsman's office is to reach an agreement between the parties in a neutral and independent manner. The services of the ombudsman's office are generally inexpensive or even free of charge and are offered in German, French, Italian and English.

We are affiliated with the following ombudsman's office:

### **Financial Services Ombudsman (FINSOM)**

Avenue de la gare 45

1920 Martigny

<https://finsom.ch>

## ***Contact***

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Do you have any further questions? We are at your disposal under the following contact details:

Rubin Overseas Ltd.

Pelikanstrasse 18

8001 Zürich