

**INFORMATION REGARDING THE SERVICES PROVIDED BY  
PENTA ASSET MANAGEMENT SA**

Dear Client,

The purpose of this information brochure is to provide you with more detailed information on PENTA Asset Management SA (hereinafter "the asset manager"), the measures aimed at preventing the loss of contact or dormant assets, financial services that we offer and their associated risks, the handling of conflicts of interest and the opening of dispute resolution before the mediation body. The information contained in this brochure is subject to changes from time to time. On request, you can obtain the most recent version of this brochure or obtain a copy via our website at the following address <https://www.penta-am.ch>

The information on the costs and charges of financial services emerges from the management, investment advice or services contract that you have signed, and we refer you to this document for more information on this subject.

For information on the risks generally associated with financial instruments, please refer to the document "Risks inherent in trading in financial instruments" from the Swiss Bankers Association (ASB) which will be provided to you when opening a new business relationship. The brochure is also available on the Internet at the following address:  
[www.swissbanking.ch/ Resources/Persistent/c/8/4/0/c840d1f03cf558c4a0dddcc9f94cb8e5c984125e/SBA\\_Risks\\_Involved\\_in\\_Trading\\_Financial\\_Instruments\\_2019\\_EN.pdf](http://www.swissbanking.ch/Resources/Persistent/c/8/4/0/c840d1f03cf558c4a0dddcc9f94cb8e5c984125e/SBA_Risks_Involved_in_Trading_Financial_Instruments_2019_EN.pdf) or on our site.

This brochure meets the information requirements of the Federal Financial Services Act (FinSA) and gives you an overview of the financial services we offer. If you would like more information, we remain at your entire disposal.

With our best regards,

**PENTA Asset Management SA**

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## **1 Information on the Asset manager**

### **1.1 Name and address**

Name : PENTA Asset Management SA  
Address : 10 bis Rue du Vieux-Collège  
1204 Genève, Suisse  
Phone : +41228196050  
Fax : +41228196059  
Email : [info@penta-am.ch](mailto:info@penta-am.ch)  
Federa Number : CH-660.0.932.010-1  
VAT Number : CHE-115.577.467 TVA  
GIIN : CX1EM9.99999.SL.756  
LEI : 254900FUG4VT6TD35R97

### **1.2 Areas of activity**

Penta Asset Management SA, headquartered in Geneva, Switzerland offers wealth management services and investment advices.

### **1.3 Supervisory status, competent authorities and supervisory body**

The asset manager is subject to the supervision of the AOOS, Société anonyme suisse de surveillance, domiciled at 30, Rue Rousseau, 1201 Geneva, Switzerland.

### **1.4 Professional secrecy**

The asset manager is subject to professional secrecy in accordance with the Financial Institutions Act (FinSA).

### **1.5 Economic links with third parties**

The manager has no economic ties with third parties that may present a risk of conflict of interest.

## **2 Customer segmentation**

The asset manager classifies his/her clients between various categories which are: private clients, professional clients or institutional clients. The attribution to a customer segment is systematically recorded. Clients who are neither considered as professional nor as institutional clients are classified as private clients. Private clients benefit from a higher level of protection than professional and institutional clients. In some cases, private clients can be classified as professional clients, but the rules for the protection of private clients no longer apply. Clients are classified as professional clients if they meet certain requirements and are not classified as institutional clients. On request, professional clients can be classified as private clients. Clients are classified as institutional clients if they meet certain requirements. On request, institutional clients can be classified either as professional clients or as private clients.

## **3 Assets without contact and dormant accounts**

It may happen that contacts with clients are severed and as a result the assets fall into dormancy. Such assets can be permanently forgotten by clients and their heirs.

To avoid the loss of contact or the loss of assets, respectively, the following is recommended:

- **Address and name changes:** Please notify us immediately if you change your location, correspondence address or name.
- **Special Instructions:** Please inform us about extended absences and any forwarding of correspondence to a third party address or custody of correspondence, as well as emergency contact details during this period.
- **Granting of powers of attorney:** it is recommended to designate an authorized person the asset manager can contact in the event of a loss of contact.
- **Information to trusted persons and testamentary arrangements:** another possibility to avoid a loss of contact and dormant assets is for a trusted person to be informed of the relationship with the asset manager. However, the asset manager can only provide information to such a trusted person if he has been authorized to do so in writing. In addition, the assets concerned can, for example, be mentioned in a will.

The asset manager will be happy to answer your questions, if any. You will also find more information in the brochure "Guidelines for handling contactless and dormant assets with Swiss banks" from the Swiss Bankers Association (ASB) available on the Internet under the following link: [www.swissbanking.ch/ Resources/Persistent/e/d/4/2/ed42bd4402f919d6e09d3f3f2953fceb308c186b/SBA\\_Guidelines\\_on\\_treatment\\_assets\\_held\\_at\\_Swiss\\_banks\\_2014\\_EN.pdf](http://www.swissbanking.ch/Resources/Persistent/e/d/4/2/ed42bd4402f919d6e09d3f3f2953fceb308c186b/SBA_Guidelines_on_treatment_assets_held_at_Swiss_banks_2014_EN.pdf) or on our website.

## **4 Information on the financial services offered**

### **4.1 Discretionary asset management**

#### **4.1.1 Type, characteristics and functioning of the financial service**

In its discretionary capacity, the asset manager manages assets in the name, for the account and at the risk of the Client who has deposited them with a custodian bank. The asset manager carries out transactions at his own discretion and without consulting the Client. Thus, the asset manager ensures that the transactions he executes comply with the Client's financial situation and investment objectives as well as the investment strategy agreed with the Client and ensures that the composition of the portfolio is tailored to the customer.

#### **4.1.2 Rights and obligations**

When signing a discretionary management mandate, the Client is entitled with the right to have his/her portfolio managed. Thus, the asset manager carefully selects the portfolio investments within the framework of the market offer available. The asset manager ensures an appropriate risk spreading insofar as the investment strategy allows. He regularly monitors the assets he manages and ensures that the investments are in line with the agreed investment strategy and that they are suitable for the Client. The asset manager regularly informs the Client about the agreed management of the assets and its execution.

#### **4.1.3 Risks**

In principle, asset management presents the following risks, which are within the risk sphere of the Client and therefore which the Client bears:

- **Risk of the investment strategy chosen:** Various risks may result from the investment strategy chosen and agreed with the Client (see below). The customer fully bears these risks. A description of the risks and a corresponding explanation of the risks take place before the investment strategy is agreed.

- **Risk of maintaining the substance of assets**, respectively the risk of loss in value of financial instruments in the portfolio: this risk, which may vary depending on each financial instrument, is borne entirely by the Client. For the risks of the various instruments, please refer to the brochure “Risks inherent in trading in financial instruments” of the Swiss Bankers Association.
- **Information risk from the asset manager**, respectively the risk that the asset manager does not have sufficient information to make an informed investment decision. When managing assets, the asset manager considers the Client's financial situation and investment objectives (suitability check). If the client provides insufficient or incorrect information to the asset manager about his financial situation and/or investment objectives, there is a risk that the asset manager will not make appropriate investment decisions for the Client.
- **Risk as a qualified investor in collective investment schemes**. Clients granting a management mandate as part of a long-term asset management relationship are considered as qualified investors within the meaning of the Collective Investment Schemes Act. Qualified investors have access to forms of collective investment which are exclusively open to them. This status makes it possible to access to a wider range of financial instruments in the construction of the portfolio. Collective investments intended for qualified investors may be exempt from regulatory requirements. These financial instruments are therefore not or only partially subject to Swiss provisions. This can create risks, in particular due to liquidity, investment strategy or transparency. Detailed information on the risk profile of a specific collective investment can be found in the constituent documents of the financial instrument and, where applicable, in the basic information sheet and prospectus.

In addition, asset management involves certain risks which are within the risk sphere of the asset manager and for which the asset manager is responsible to the Client: the asset manager has taken the appropriate measures to respond to these risks, in particular the respect of the principle of good faith and the principle of equal treatment when processing client orders. In addition, the asset manager ensures optimal execution of Client orders.

#### **4.1.4 Market offer taken into consideration**

The market offer taken into consideration for the selection of financial instruments relies on third party financial instruments. The asset manager may, however, select its own financial instruments. The list of financial instruments that we may use during the execution of our mandate is listed in the management contract or the investment profile that you have signed.

### **4.2 Investment advice on the entire portfolio**

#### **4.2.1 Type, characteristics and functioning of the financial service**

As part of investment advice on the entire portfolio, the asset manager advises clients on financial instrument transactions considering the entire portfolio. To this end, the asset manager ensures that the recommended transaction matches the financial situation and the investment objectives (suitability check) as well as the Client's needs and the investment strategy agreed with the Client. The Client then decides for himself to what extent he wishes to follow the recommendation of the asset manager.

#### **4.2.2 Rights and obligations**

When providing investment advice on the entire portfolio, the Client is entitled to adequate personal investment recommendations. Investment advice on the entire portfolio takes place regularly either at the initiative of the Client or at the initiative of the asset manager within the framework of the market offer taken into consideration for the selection of financial instruments. The asset manager advises the Client to the best of his knowledge and with the same care that he usually applies to his own affairs.

The asset manager immediately informs the Client of any significant difficulties that could affect the correct processing of the order. The asset manager also regularly informs the Client of the investment advice that has been agreed and provided.

#### 4.2.3 Risks

The investment advice on the whole portfolio presents in principle the following risks, which are in the risk sphere of the Client and therefore that the Client bears:

- **Risk of the investment strategy chosen:** Various risks may result from the investment strategy chosen and agreed with the Client (see below). The customer fully bears these risks. A description of the risks and a corresponding explanation of those risks take place before the investment strategy is agreed.
- **Risk of maintaining the substance of assets,** respectively the risk of loss in value of financial instruments in the portfolio: this risk, which may vary depending on each financial instrument, is borne entirely by the Client. For the risks of the various instruments, please refer to the brochure “Risks inherent in trading in financial instruments” published by the Swiss Bankers Association.
- **Information risk on the part of the asset manager,** respectively the risk that the asset manager does not have sufficient information to be able to make an appropriate recommendation: when providing investment advice on the entire portfolio, the asset manager takes into consideration the Client's financial situation and investment objectives (suitability check) as well as the Client's needs. If the Client provides the asset manager with insufficient or incorrect information about his financial situation, investment objectives or needs, there is a risk that the asset manager may not be able to advise him adequately.
- **Information risk on the part of the Client** respectively the risk that the client does not have sufficient information to be able to make an informed investment decision: even if in the investment advice on the whole portfolio the asset manager takes the portfolio into account, it is the client who makes the investment decisions. As a result, the client needs specialized knowledge to understand financial instruments. This creates the risk for the Client of not following proper investment recommendations due to a lack or insufficient financial knowledge.
- **Risk related to the timing of the order processing,** respectively the risk that the Client places a buy or sell order too late after consulting the asset manager, which can lead to price losses. The recommendations made by the manager are based on the market data available at the time it is consulted and are only valid for a short period due to the dependence of the market.
- **Risk as a qualified investor in collective investment schemes:** Clients who use investment advice on the entire portfolio as part of a long-term investment advisory relationship are considered qualified investors within the meaning of the Collective Investment Schemes Act. Qualified investors have access to forms of collective investment which are exclusively open to them. This status makes it possible to access to a wider range of financial instruments in the construction of the portfolio. Collective investments intended for qualified investors may be exempt from regulatory requirements. These financial instruments are therefore not or only partially subject to Swiss provisions. This can create risks, in particular due to liquidity, investment strategy or transparency. Detailed information on the risk profile of a specific collective investment can be found in the constituent documents of the financial instrument and, where applicable, in the basic information sheet and prospectus.

In addition, the investment advice on the entire portfolio involves certain risks which are in the risk sphere of the asset manager and for which the asset manager is responsible towards the Client: the asset manager has taken the appropriate measures to respond to these risks, in particular the respect of the principle of good faith and the principle of equal treatment when processing client orders. In addition, the asset manager ensures optimal execution of client orders.

#### **4.2.4 Market offer taken into account**

The market offer taken into consideration for the selection of financial instruments relies on third party financial instruments. The asset manager may, however, have recourse to its own financial instruments. The list of financial instruments that we may use in the execution of our mandate is listed in the advisory contract or the investment profile that you have signed.

### **4.3 Execution only**

#### **4.3.1 Type, characteristics and functioning of the financial service**

By Execution Only we mean financial services which are limited to the simple transmission of Client orders by the asset manager without any advice nor management. Within the scope of an Execution Only mandate, orders are initiated exclusively by the Client and transmitted by the asset manager. The asset manager does not verify whether the transaction in question matches the client's knowledge and experience (adequacy) as well as his financial situation and investment objectives (suitability). When executing orders by the client in the future, the asset manager will not have to remind him that he is not doing an appropriateness or adequacy check.

#### **4.3.2 Rights and obligations**

In the case of an Execution Only mandate, the Client has the right to give orders to buy or sell financial instruments within the framework of the market offer taken into consideration. The asset manager has the duty to transmit for execution the orders given with the same care that he usually applies to his own affairs.

The asset manager immediately informs the Client of all material circumstances that could affect the correct processing of the order. The asset manager also regularly informs the Client of the agreed and executed orders.

#### **4.3.3 Risks**

Execution Only presents in principle the following risks, which are in the risk sphere of the Client and therefore that the Client bears:

- **Risk of maintaining the substance of assets**, respectively the risk of loss in value of financial instruments in the portfolio: this risk, which may vary depending on each financial instrument, is borne entirely by the Client. For the risks of the various instruments, please refer to the brochure "Risks inherent in trading in financial instruments" of the Swiss Bankers Association.
- **Risk of information on the part of the Client** respectively the risk that the Client does not have sufficient information to be able to make an informed investment decision. The Client makes decisions about investment without the intervention of the asset manager. As a result, the Client needs specific knowledge to understand financial instruments and time to become familiar with the financial markets. If the Client does not have the necessary knowledge and experience, he takes the risk of investing in a financial instrument that is not suitable for him. Lack of financial knowledge or insufficient financial knowledge may further lead the Client to make investment decisions that are not in line with their financial situation and / or their investment objectives.
- **Risk related to the timing of order processing**, respectively the risk that the Client places a buy or sell order at an inopportune time, which can lead to price losses.
- **Risk of inadequate supervision** respectively the risk that the Client does not monitor his portfolio or does not supervise it sufficiently: the asset manager has no obligation at any time

to monitor, warn or provide information. Insufficient supervision by the Client can come with various risks, such as concentration risks.

In addition, an Execution Only mandate involves certain risks which fall within the sphere of responsibility of the asset manager and for which he is responsible towards the Client: the asset manager has taken the appropriate measures to respond to these risks, in particular the respect of the principle of good faith and the principle of equal treatment when processing client orders. In addition, the asset manager ensures optimal execution of Client orders.

#### **4.3.4 Market offer taken into consideration**

The market offer taken into consideration for the selection of financial instruments is based on that of the custodian bank chosen by the client or, if Client so wishes, that of brokers external to the custodian bank.

### **5 Conflict of interests**

#### **5.1 In general**

Conflicts of interest may arise, in particular when the asset manager:

- obtains for himself in violation of the principle of good faith a financial advantage or avoids a financial loss to the detriment of the clients;
- has an interest in the outcome of a financial service provided to clients that is contrary to the interest of the clients;
- has a financial or other incentive to place, when providing financial services, the interests of certain clients above the interests of other clients;
- in violation of the principle of good faith, accepts from third parties an inducement in the form of financial or non-financial advantages or other services in connection with a financial service provided to the Client.

Conflicts of interest may arise in the context of asset management and investment advice on the entire portfolio. They result, in particular, from the collision of:

- several customers' orders;
- client orders involving own operations or other own interests of the asset manager or those of companies linked to the asset managers;
- client orders with transactions by employees of the asset manager.

To identify conflicts of interest and prevent them from creating a disadvantage for the Client, the asset manager has issued internal directives and taken organizational measures.

Upon request, the asset manager will provide you with additional information on the potential conflict of interests in relation to the services offered and on the organizational measures taken to protect the Client.

If disadvantages for the Client cannot be excluded despite the measures taken, the manager will inform the Client.

#### **5.2 Remuneration received from third parties or paid to third parties**

The treatment of third-party remunerations, distribution commissions and other commissions (e.g., retrocessions, sales commissions, issue costs, state commissions, finder's fees, discounts, or other



pecuniary or appreciable money benefits) that the manager may receive from third parties in connection with or in connection with the performance of this Agreement shall be reimbursed to the Client.

Intermediaries who bring Clients to the asset manager or are involved in managing the relationship with the Client receive from the asset manager part of the management fees and compensation for expenses.

### **5.3 Other information**

On request, the asset manager will be happy to provide you with additional information on any conflicts of interest in connection with the services provided by the asset manager and on the measures taken to protect the Client.

## **6 Mediation body**

Your satisfaction is our concern. If the asset manager has nevertheless refused a claim on your part, you can initiate mediation proceedings before the mediation body. In this case, please contact:

Name : OFS Ombud Finance Suisse

Address : Rue du Conseil-Général 10

1205 Genève, Suisse

Phone : +41228080451

Internet : [www.ombudfinance.ch](http://www.ombudfinance.ch)