

## 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 regulations on the offer of financial services and financial products and, on the other hand, 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, existing processes were further revised and adapted to the requirements of the FINSA where necessary within the applicable transitional periods. 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. The company is a partner company of Aquila Ltd and can draw on specific expertise in the areas of legal, compliance & risk, accounting and IT (outsourcing). As a partner company of Aquila Ltd, the company is supervised by FINMA with regard to compliance with the provisions of the AMLA as well as the Ordinance of the Swiss Financial Market Supervisory Authority on Combating Money Laundering and Terrorist Financing in the Financial Sector and has applied for a license as an asset manager within the meaning of Art. 17 para. 1 FINIA. Aquila Ltd has a banking license and is also supervised by FINMA.

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### Our services

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

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

### Conflicts of interests

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As part of our service, we take into account a comprehensive range of products and services, which is narrowed down by proven selection processes aligned with 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 please contact us.

### Client segmentation

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An important element of client protection under the FINSA is the division of clients into investor protection classes. We divide them into the three segments of "private clients," "professional clients," and "institutional clients as defined by FINSA. Private clients enjoy the highest level of investor protection.

Unless you receive information to the contrary, you are classified as a private customer. 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 office:

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

Avenue de la Gare 66

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