

FINANCIAL SERVICES ACT (Finsa)

CLIENT DISCLOSURE DOCUMENT

This document contains general information about CA Indosuez Wealth (Europe) SA (the “Bank”) and outlines the main elements of the Swiss Financial Services Act (“FinSA”) in the context of the business relationship between the client and the Bank. The Wealth Managers remain at your disposal for any further information you may require.

This document is intended solely for clients residing in Switzerland (hereinafter “Client in Switzerland”).

The information in the document is subject to change. The Client can access the latest version of this information at any time by visiting the Luxembourg version of the Bank’s website (<https://luxembourg.ca-Indosuez.com>) and clicking on the “Indosuez in Luxembourg” tab, then selecting “Our compliance policy”.

1. GENERAL INFORMATION

1.1. INFORMATION ABOUT THE BANK

CA Indosuez Wealth (Europe) SA is a company incorporated under Luxembourg law whose registered office is at 39 Allée Scheffer, L-2520 Luxembourg, and whose postal address is BP1104, L-1011 Luxembourg, registered with the Luxembourg Companies Register under number B91986, an authorised credit institution established in Luxembourg and supervised by the Commission de Surveillance du Secteur Financier (CSSF).

In its capacity as a Luxembourg credit institution, it offers its Client in Switzerland investment services through its head office in Luxembourg and through its branches. The Bank can also provide financial services, as defined by FinSA, in Switzerland. These activities include, in particular, discretionary portfolio management, the provision of investment advice, the simple execution of orders and Lombard credits, activities governed by the Law of 5 April 1993 on the financial sector and which are covered by FinSA in Switzerland.

The Bank is not subject to FINMA supervision, particularly regarding its relations with clients in Switzerland. Since the Bank is not an institution governed by Swiss law, it is not affiliated to the Swiss system of self-regulation of deposit guarantees. Clients in Switzerland, however, are entitled to the deposit guarantees offered under Luxembourg law.

In accordance with FinSA, only Wealth Managers signed up to an Adviser register can actively serve Clients In Switzerland. The Bank will provide more details regarding this registration at the request of a Client in Switzerland.

The contact details for the Bank are as follows:

CA Indosuez Wealth (Europe) SA
39, Allée Scheffer
L-2520 Luxembourg
Telephone: + 352.24.67.1
Internet site: <https://luxembourg.ca-indosuez.com>

1.1 MEDIATION BODY

Client satisfaction is the Bank’s priority. In the event of a dispute with a Client in Switzerland, the Bank shall make every effort to find a satisfactory solution. However, if no satisfactory solution can be found, in accordance with article

77 of FinSA, the Bank is affiliated with the Swiss Chambers’ Arbitration Institution (SCAI), an informational and mediation body whose contact details are as follows:

Swiss Chambers’ Arbitration Institution (SCAI)
Boulevard du Théâtre 4
case postale 5039
1211 Genève 11
Telephone: +41 22 310 74 30
website: www.swissarbitration.org/Ombuds-FIN

2. IMPORTANT ELEMENTS OF FINSA RELATIVE TO MIFID II LEGISLATION

2.1 INTRODUCTION

FinSA is part of the new Swiss financial market supervision architecture. Its goals are to protect its Clients in Switzerland in the provisioning of financial services, to set comparable requirements for the provision of such services, and thereby to contribute to the reputation and competitiveness of the Swiss financial centre. It also regulates the offering of financial instruments.

This law is applicable to financial services actively provided to Clients in Switzerland.

The FinSA rules are largely inspired by EU regulations (MiFID II, Prospectus regulation and PRIIPs).

As an institution located in the European Union, the Bank is bound to comply with the rules arising from MiFID II in its offering and provision of investment services (financial services per FinSA terminology). These constraints may be more restrictive than those arising from FinSA. This is the case, in particular, the assessment of appropriateness and/or suitability, constraints relating to the execution of orders and the duty to inform about financial instruments and investment services.

As a Luxembourg credit institution, the Bank shall also classify its Clients in Switzerland into one of the following categories as stipulated in the MiFID II rules: private client, professional client or eligible counterparty. This classification will determine the degree of investor protection afforded to the client under Luxembourg law, in addition to FinSA. The Bank shall ensure consistency between the criteria and classifications under both MiFID II and FinSA and shall therefore apply the classification offering the greatest degree of protection to the Client in Switzerland.

2.2 CLIENT CLASSIFICATION

FinSA establishes an obligation to classify Clients in Switzerland in one of the following three categories:

- **Private clients:** The Bank classifies as private clients all Clients in Switzerland that are not professional or institutional clients. Information about product risks must be communicated to them, for example via a key information document (KID). The investment universe is generally limited to products designed or authorised for marketing to private clients. This is the classification that ensures them the highest level of protection with regard to FinSA.

- **Professional clients:** Professional clients receive a lower level of protection than private clients due to their knowledge, experience, and ability to assume risks. Certain rules of conduct are not applicable to them. In accordance with FinSA, these professional clients can access a wider selection of financial instruments than private clients, including financial products that cannot be marketed to private clients.
- **Institutional clients:** Clients in Switzerland belonging to this category are deemed to have sufficient knowledge and experience to assess the suitability of an investment service. As a result, the protection rules laid down by FinSA do not apply to transactions with institutional clients.

The FinSA classification is also decisive in the definition of the **qualified investor status** within the meaning of the Federal Act on Collective Capital Investments.

Finally, it should be noted that, under certain conditions, a Client in Switzerland may request a change in their classification in order to benefit from increased protection (opting-in) or greater freedom resulting from a lower level of protection (opting-out).

2.3 INFORMATION ON FINSA FINANCIAL SERVICES

The Bank provides various types of financial services within the meaning of FinSA, including:

- **Wealth management:** Under a discretionary management mandate, the Client in Switzerland entrusts his or her assets to the Bank with a view to having them managed by the Bank according to an agreed investment strategy. For this type of mandate, the Bank makes the investment decisions.
- **Advisory investment services:** The Bank provides this service within the framework of an investment advisory contract according to the parameters predefined with the client in line with the agreed investment strategy. For this type of service, the Bank recommends one or more financial instruments and the Client in Switzerland makes the final investment decision.
- **Execution only:** The Client in Switzerland gives an investment order and the Bank executes it.

2.4 INFORMATION ON RISKS

Transactions in financial instruments are associated with opportunities and risks. It is therefore important that Client in Switzerland know and understand the risks before subscribing to a financial service or an instrument.

General information on typical investment services as well as the characteristics and risks of financial instruments is given in:

- the **Investor Guide** available on the Luxembourg version of the Bank's website (<https://luxembourg.ca-indosuez.com>) by clicking on the "Indosuez in Luxembourg" tab, then selecting "Our compliance policy"; and
- the **General Terms and Conditions** available on the Luxembourg version of the Bank's website

(<https://luxembourg.ca-indosuez.com>) by clicking on the "Indosuez in Luxembourg" tab, then selecting "Legal information and documentation".

Clients in Switzerland may contact their Wealth Managers for any additional clarification enabling them to improve their knowledge of a financial instrument or the specific risks associated with any planned investment.

2.5 INFORMATION ON COSTS

The Bank informs its Clients in Switzerland of the costs associated with the investment services. This information may be provided on a durable medium, electronic or analog, but it is also available on the Luxembourg version of the Bank's website (<https://luxembourg.ca-indosuez.com>) by clicking on the "Indosuez in Luxembourg" tab, then selecting "Legal information and documentation".

2.6 CONFLICTS OF INTEREST

In order to comply with the rules of conduct, the Bank has put in place a policy to avoid conflicts of interest that may arise during the provision of investment services or to exclude any disadvantages that may arise from these conflicts for its clients. Clients can refer to the Conflicts of interest policy available on the Luxembourg version of the Bank's website (<https://luxembourg.ca-Indosuez.com>) by selecting "Our compliance policy" under the "Indosuez in Luxembourg" tab.

The Client in Switzerland is particularly informed that the Bank may use financial instruments issued or managed by it or by another Crédit Agricole group entity when providing advisory and/or discretionary management services.

The Client is further informed that the Bank may receive and keep benefits in accordance with its General Terms and Conditions and within authorised legal limits.

3. LEGAL INFORMATION

This document is made available for informational purposes only; it does not exempt the client from contacting their legal or financial advisers to analyse the requirements of FinSA and assess their implications.

It should not be considered as an advertising document and does not constitute a solicitation or offer for a financial service or a recommendation to buy or sell any financial instrument.

CA Indosuez (Wealth) Europe SA accepts no responsibility for the content of this brochure. The information provided above is not exhaustive and may change over time.

CA Indosuez (Wealth) Europe SA, May 2023.

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