



THE FINANCIAL SERVICES ACT (FinSA)

Information for Clients

The general information provided below is non-exhaustive and subject to change over time. In case of questions and/or if you need any additional information, please contact your relationship manager.

The Swiss Financial Services Act (FinSA) and its implementing ordinance (FinSO) entered into force on 1st January 2020. They aim to strengthen client protection during the provision of financial services and thus contribute to enhance the reputation and competitiveness of the Swiss financial center.

FinSA contains, to that effect, rules of conduct (notably obligation to inform and to document) as well as organizational requirements.

You will find below important information for you as a client.

Information related to Intesa Sanpaolo Wealth Management SA, its supervisory authority and its ombudsman

Intesa Sanpaolo Wealth Management SA is authorised and supervised by the FINMA as a bank within the meaning of the Swiss Federal Act on Banks and Saving Banks (BA).

Intesa Sanpaolo Wealth Management SA

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1204 Geneva

Switzerland

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www.intesasnpaolowm.ch

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Branches in Switzerland: Zürich and Lugano

Swiss Financial Market Supervisory Authority FINMA

Laupenstrasse 27

3003 Bern

Switzerland

+41 327 91 00

www.finma.ch/en/contact/

Intesa Sanpaolo Wealth Management SA highest priority is its Clients' satisfaction. Should we fail in meeting your expectations, we kindly ask you to contact us so that we can find a solution together. Should we not succeed in settling your request, you can contact the Swiss Banking Ombudsman which will assess your file with little or no costs involved.

Swiss Banking Ombudsman

Bahnhofplatz 9

PO Box

8021 Zürich

Switzerland

+41 21 311 29 83 (French/Italian)

+41 43 266 14 14 (German/English)

www.bankingombudsman.ch



Client protection

The level of Client protection depends on the Client classification and on the type of financial services provided.

Financial Services

Intesa Sanpaolo Wealth Management SA provides financial services such as:

- Receipt and transmission of orders relating to financial instruments ;
- Administration of financial instruments (discretionary portfolio management) ;
- Provision of personal recommendations on financial instrument transactions (investment advice);
- Granting of loans to execute transactions with financial instruments.

Classification

Intesa Sanpaolo Wealth Management SA classifies its Clients in one of the following categories :

- *Retail Clients (by default)*
Clients who are neither Professional Clients nor Institutional Clients
- *Professional Clients*
 - (i) *public entities with professional treasury operations ;*
 - (ii) *occupational pension schemes with professional treasury operations and other*
 - (iii) *occupational pension institutions providing professional treasury operations ;*
 - (iv) *companies with professional treasury operations ;*
 - (v) *large companies ;*
 - (vi) *private investment structures with professional treasury operations created for high-net*
 - (vii) *worth retail clients.*
- *Institutional Clients :*
 - (i) *financial intermediaries within the meaning of the BA, the Federal Act on Financial Institutions (FinIA) and the Federal Act on collective investment schemes (CISA) ;*
 - (ii) *insurance companies as defined in the Federal Act on Insurance Contract (ISA) ;*
 - (iii) *foreign clients subject to prudential supervision as the persons listed above ;*
 - (iv) *central banks ;*
 - (v) *national and supranational public entities with professional treasury operations.*

Retail Clients benefit from the highest level of protection in relation to financial service provided.

Professional and Institutional Clients are considered qualified investors within the meaning of the CISA.
Retail Clients with discretionary or advisory mandates are also considered qualified investors within the meaning of the CISA.

Clients may, under certain conditions, declare in writing that they wish to be classified in a segment offering a lower level of protection (opting-out) or, on the contrary, in a segment offering a higher level of protection (opting-in). We kindly ask you to contact your relationship manager on this matter.

Typical risks involved in trading financial instruments

Transactions with financial instruments carry opportunities and risks. It is therefore important that you are familiar with and understand these risks before resorting to a financial service. To that end, you will find general information on financial services and on the characteristics and risks of financial instruments in the brochure [SBA Risks Involved in Trading Financial Instruments](#)



Appropriateness and suitability of financial services

Intesa Sanpaolo Wealth Management SA does not conduct any appropriateness or suitability checks for execution-only transactions.

Likewise, Intesa Sanpaolo Wealth Management SA does not conduct any appropriateness or suitability checks when providing financial services to Institutional Clients.

Intesa Sanpaolo Wealth Management SA presumes that Professional Clients have the required knowledge and experience as well as the financial capacity to assume the investment risks linked to the financial services provided to them.

Costs

Intesa Sanpaolo Wealth Management SA informs its Clients of the costs associated with the financial services provided at the account opening stage by handing over the fee schedule which is also available at any time upon request.

Additional information on costs linked to financial instruments is provided in the Key information

Document (KID) and the prospectus where available for the type of instrument concerned. Transaction costs are indicated on the associated transaction advice.

Conflicts of interests

Intesa Sanpaolo Wealth Management SA strives to manage any potential conflict of interests it may face when providing financial services in a manner consistent with the highest standards of integrity and fair dealing. To that effect, Intesa Sanpaolo Wealth Management SA has put in place adequate organizational measures to identify, prevent or manage such conflicts of interests. If internal measures prove insufficient to prevent the risk of damage to the Clients, Intesa Sanpaolo Wealth Management SA will disclose such conflicts of interest, in a general or specific way, to the Clients.

Information on the market offer taken into consideration

Intesa Sanpaolo Wealth Management SA works in an open architecture environment and provides access to financial instruments available on the market and issued by third-party product providers as well as products developed by the Intesa Sanpaolo Wealth Management SA group or in partnership with third parties.

Best execution

Intesa Sanpaolo Wealth Management SA has established best execution arrangements that enable to take all necessary measures to ensure the best possible result in terms of costs, speed and quality when executing Clients' orders.

Documentation

A key information document (KID) (or its equivalent published in line with the European regulations) is made available by Intesa Sanpaolo Wealth Management SA when giving private Clients personal recommendations for financial instruments as well as the prospectus, to the extent it is required.

In case of non-advised transactions, the KID will only be made available if it has been provided by the manufacturer of the financial instrument and if it is possible to find one with reasonable effort.

You can find the KIDs – to the extent provided by the manufacturer – on our website

<https://www.reyl.com/en/legal-informations/product-information.html>