

General Investor Information (MiFID II Information Brochure)

As of: 30.12.2022

Solely in the interests of making this document easier to read, neither it nor any documents linked to it contain references to both male and female linguistic forms. The generic masculine is used whereby all personal references are to be viewed as gender-neutral.

Aim, purpose and content of the General Investor Information

The European Union's Markets in Financial Instruments Directive (MiFID) has regulated securities business in Europe since November 2007. In response to changes to the market structure, innovations on financial markets and the consequences of the financial crisis, the EU undertook a far-reaching revision of the Directive, extending it significantly in the process, in 2014 and created a revised Directive (MiFID II). The rules contained therein are expected to make financial markets more transparent and efficient while improving their integrity and, above all, ensuring that investors are better protected.

As a Member State of the European Economic Area (EEA), Liechtenstein is obliged to incorporate this requirement by the EU in national law. It is incorporated primarily by modifying the Liechtenstein Banking Act (BankG) and the associated Banking Ordinance (BankV) and the Act on Asset Management (VVG).

The Banking Act and the Associated Banking Ordinance of the Principality of Liechtenstein require banks that supply investment services and ancillary investment services to provide their clients with detailed information about the banks themselves and the services and products they offer.

This General Investor Information aims to give you an overview of SIGMA Bank AG and the investment services it supplies so that you have all the information you need about your investment activities. The General Investor Information does not claim to describe all aspects of securities business in detail. With regard to certain topics, the present General Investor Information therefore refers to additional documents, which you have also been given by SIGMA Bank AG, the current version of which is available on the SIGMA Bank AG website and which can be provided free of charge on request.

The General Investor Information is updated on an ongoing basis, as required. SIGMA Bank AG reserves the right to inform you of key changes, in particular, to the content of this General Investor Information using the agreed communications channel (such as by mail or by electronic communication).

SIGMA Bank AG should also mention that the General Investor Information cannot replace a face-to-face discussion with its client advisors. Should you therefore have any queries regarding the principles described in this document or you would otherwise like more detailed information about SIGMA Bank AG and its services and products, the client advisors at SIGMA Bank AG will be happy to meet you for a face-to-face discussion.



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1. General information

1.1. Information regarding SIGMA Bank AG

SIGMA Bank AG

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SIGMA Bank AG is recorded in the Public Register of the Principality of Liechtenstein as a bank incorporated in the legal form of a joint stock company. It has a license from the Liechtenstein Financial Market Authority (FMA), Landstrasse 109, PO Box 279, 9490 Vaduz, Liechtenstein for its banking activities and is subject to its prudential supervision.

In addition to supplying banking services, SIGMA Bank AG is also authorized to supply investment services and ancillary investment services relating to various financial instruments.

SIGMA Bank AG does not use any tied brokers when supplying investment services.

SIGMA Bank AG is a member of the Liechtenstein Bankers' Association and is a member of the "Deposit Guarantee and Investor Protection Foundation" of the Liechtenstein Bankers' Association to protect clients' assets. The extent of the liabilities protected by the Deposit Guarantee and Investor Protection Foundation is described in the "Information for Depositors". This can be found in your documents or on the SIGMA Bank AG website.

1.2. Language and means of communication

German or English is the definitive language for the contractual relationship between SIGMA Bank AG and its clients. However, you may also communicate with SIGMA Bank AG at any time in another language – if that has been agreed. In principle, contractual documents and documents are drawn up in German or English, unless SIGMA Bank has agreed otherwise with you.

General information, as applicable at the time, is published on the SIGMA Bank AG website. SIGMA Bank AG will also provide this information in paper format on request.

SIGMA Bank AG will normally communicate with you using your preferred channel. Orders and notifications by telephone, fax, e-banking or e-mail will only be accepted on the basis of a separate written agreement. If such an agreement has been concluded and you contact SIGMA Bank AG using one of these communications channels, SIGMA Bank AG also reserves the right to contact you in the same manner.

2. Terms and Conditions

The rights and obligations associated with the provision of investment services applicable between SIGMA Bank AG and you are regulated in the Terms and Conditions. In particular, the “General Terms and Conditions” (T&Cs) and the “Regulations governing Securities Accounts” of SIGMA Bank AG are decisive here. These can be found in your documents or on the SIGMA Bank AG website. The present General Investor Information provides additional information.

3. Client classification

3.1 Classification by SIGMA Bank AG

The respective classification of its clients is a key element of the client relationship. SIGMA Bank AG therefore undertakes at least two classifications with regard to each client.

Firstly, SIGMA Bank AG undertakes a classification of clients that allows it to supply its services with the requisite expertise, diligence and conscientiousness in the best possible interests of its clients. For this purpose, SIGMA Bank AG collects information regarding the client's experience and knowledge of securities transactions, what the client hopes to achieve from these transactions and his personal and financial circumstances.

Secondly, SIGMA Bank AG classifies its clients according to criteria specified by law as “non-professional clients”, “professional clients” or “eligible counterparty”. This classification is intended to ensure that its clients are treated appropriately and benefit from an adequate level of protection depending on their knowledge and experience of securities transactions as well as the type, frequency and extent of such transactions.

All clients are notified in writing of their classification when they open a securities account. If existing clients are reclassified because of a change in the circumstances, they are also notified of this in writing.

3.2 Non-professional client

Clients are regarded as “non-professional clients” (sometimes also referred to as “small investors” or “private investors”) if they cannot be classified as either a “professional client” or as a “eligible counterparty”. Non-professional clients benefit from the highest level of protection provided for by law.

3.3 Professional client

In contrast to “non-professional clients”, in the case of “professional clients”, the persons acting are regarded as having sufficient experience, knowledge and expertise to be able to make investment decisions and assess the risks associated therewith properly. A lower level of protection applies to “professional clients” than to “non-professional clients”.

According to the criteria of the Liechtenstein Banking Act, the following legal personalities are regarded as “professional clients” in any case:

- Institutional investors:
 - Financial institutions, including banks and investment firms
 - Insurance companies
 - Funds and their management companies
 - Commodity (derivatives) traders
 - Local firms as defined by Art. 4 para. 1 no. 4 of Regulation (EU) No. 575/2013
 - Other institutional investors.
- Companies that feature at least two of the following characteristics at company level:
 - A balance sheet total of at least EUR 20 million
 - Net revenue of at least EUR 40 million
 - Capital of at least EUR 2 million
- Regional authorities and public bodies that manage public debt, central banks as well as comparable international and supranational organizations (such as the IMF, EIB, World Bank)
- Other institutional investors whose principal activity consists of investing in financial instruments, including other institutions engaged in the securitization of liabilities and other financing transactions.

3.4 Eligible counterparty

In principle, eligible counterparties benefit from the lowest level of protection. According to the Liechtenstein Banking Act, only the following legal personalities are eligible as “eligible counterparties”:

- Banks, investment firms, asset management companies, insurance companies, UCITS and their management companies, pension funds and their management companies, other authorized financial institutions or financial institutions subject to supervision in accordance with EEA law or the legal provisions of an EEA Member State, national governments and their institutions including public bodies that manage public debt at a national level, central banks and supranational organizations
- Legal personalities from third countries that are equivalent to the above-mentioned legal personalities
- Large companies (for more information, please also refer to 3.3 Professional client), if they explicitly agree to be classified as a “eligible counterparty”.

In the case of this client category too, SIGMA Bank AG assumes that the persons acting are regarded as having sufficient experience, knowledge and expertise to be able to make investment decisions and assess the risks associated therewith properly.

SIGMA Bank AG does not provide any investment advisory or portfolio management services for “eligible counterparties”. If clients that are classified as “eligible counterparties” still want to make use of these services, they must apply to be reclassified as “professional clients”.

3.5 Reclassification

Clients of SIGMA Bank AG may apply to have their client classification changed at any time. In the event of a reclassification to a higher level of protection (such as from “eligible counterparty” to “professional client”), which can be effected informally, SIGMA Bank AG must accede to the request in each case, if the business relationship is to continue. Whereas a reclassification (to “professional client” or “eligible counterparty”) that entails a lower level of protection must be agreed with SIGMA Bank AG.

If clients wish to be reclassified from “non-professional client” to “professional client”, they must meet at least two of the following criteria:

- The client has conducted 10 significant transactions on average per quarter on the relevant markets during the four previous quarters.
- The client has liquid assets and financial instruments worth the equivalent of more than EUR 500,000.
- The client or in the case of a legal entity or an independent special fund, the person authorized to conduct transactions in its name, works or worked for at least one year in a professional position in the financial sector that presupposes knowledge of the planned transactions or services.

If clients wish to be reclassified from “non-professional client” or “professional client” to “eligible counterparty”, they must feature the characteristics of a “eligible counterparty” described above.

The request for reclassification to “professional client” or “eligible counterparty” must be made in writing to SIGMA Bank AG using the “Reclassification according to MiFID” form. SIGMA Bank AG will be happy to provide this form when you open your securities account or on request. Your client advisor will be happy to explain the precise procedures and effects of the request.

Please note that

- SIGMA Bank AG will only undertake a reclassification generally and in relation to all investment services, ancillary investment services and financial instruments and
- the reclassification is also linked to a change in the level of protection provided for by law.

You are obliged to notify SIGMA Bank AG if one or more of the requirements for your client classification no longer apply. Should SIGMA Bank AG realize that you no longer meet the requirements for your current client classification, SIGMA Bank AG is obliged to undertake the requisite reclassification on its own initiative. SIGMA Bank AG will notify you of this immediately.

SIGMA Bank AG may also grant clients a higher or lower level of protection on its own initiative if the requirements for another client classification are met and the consent of the client in question has been obtained.

4. Information about the investment services offered by SIGMA Bank AG

A description of the various types of financial instruments and the risks associated therewith as well as general investment risks can be found in the “Risks in securities trading” document in your documents or on the SIGMA Bank AG website.

SIGMA Bank AG provides various types of investment services and ancillary investment services. You may agree jointly with SIGMA Bank AG how heavily SIGMA Bank AG is to be involved in your investment decision.

If you want to decide on your investments and your portfolio yourself and do not need any help in doing so, SIGMA Bank AG is happy to only provide you with a securities account and to accept your securities orders (“**non-advisory**”, or “**execution only**”).

If you would like SIGMA Bank AG to help with recommendations and advisory services for your portfolio, market developments or specific investment opportunities tailored to your requirements, SIGMA Bank AG can also assist you (**investment advisory**). SIGMA Bank AG is also happy to manage your portfolio for you. Here, SIGMA Bank AG will make investment decisions for you and will send you regular reports on your assets and performance (**portfolio management**).

A more detailed description of the investment services offered by SIGMA Bank AG is provided below. You are welcome to contact SIGMA Bank AG if you already know which of its services you would like to use. The client advisors at SIGMA Bank AG will lead you through all the steps needed and will also help you if you have not yet decided which services are appropriate for you and your objectives.

Whatever you choose, a prior agreement between you and SIGMA Bank AG will be needed for the provision of each investment service.

4.1 Non-advisory business and “execution only”

SIGMA Bank AG will carry out securities orders that are executed outside the framework of an investment advisory or portfolio management service on a “**non-advisory**” basis. This means that SIGMA Bank AG will not influence your investment decision through recommendations or other actions.

Therefore, non-advisory services include those:

- where SIGMA Bank AG issues general information (product-specific, investment specific information) and/or
- where the client has already specified an investment request precisely and
- no personal recommendation is given to the client by SIGMA Bank AG.

In the case of non-advisory business, an assessment is made as to whether the **risks** of the financial instrument seem compatible with your personal **knowledge and experience (appropriateness test)**, (for more information, please also refer to section 5. Suitability and appropriateness)). In the case of non-advisory business, there is no review of whether the product is appropriate to your financial or personal situation or whether it is consistent with your investment objectives.

If, when carrying out an appropriateness test, SIGMA Bank AG comes to the conclusion that the service or financial instrument in question is not appropriate for you or SIGMA Bank AG does not have all the information it needs to decide whether it is appropriate or not, you will be **warned** of this by SIGMA Bank AG. Warnings may be issued in standardized form. The order may be carried out at your request despite the warning if you once again issue an explicit confirmation to SIGMA Bank AG that it is to execute the transaction.

If, however, SIGMA Bank AG cannot reach you with such a warning before the order is carried out, whether this is because you did not want SIGMA Bank AG to contact you or whether you were not available on short notice, SIGMA Bank AG reserves the right in cases of doubt **not to execute the order for your protection** (for more information, please refer to the T&Cs of SIGMA Bank AG, which are available on its website).

SIGMA Bank AG will execute securities orders that take place **at your instigation** and involve **non-complex financial instruments** as “execution-only” transactions. In this connection, SIGMA Bank AG will not check whether the financial instrument or securities transaction in question is appropriate for you (for more information, please refer to section 5. Suitability and appropriateness), there are no additional safeguards.

An “execution-only” transaction is permissible for the following non-complex financial instruments:

- Equities that are admitted to trading on a regulated market or an equivalent market in a third country or a multilateral trading facility (MTF), if they are equities issued by companies with the exception of units in collective investment undertakings that are not undertakings for collective investments in transferable securities (UCITS) and equities in which a derivative is embedded
- Debt securities or other securitized debt instruments that are admitted to trading on a regulated market or an equivalent market in a third country or an MTF, with the exception of debt securities or securitized debt instruments which are embedded in a derivative or which contain a structure that makes it difficult for the client to understand the risks associated therewith
- Money market instruments with the exception of instruments in which a derivative is embedded or which contain a structure that makes it difficult for the client to understand the risks associated therewith
- Equities or units in UCITS with the exception of the structured UCITS specified in Art. 36 para. 1 No. 2 of the Regulation 538/2010
- Structured deposits with the exception of deposits which contain a structure that makes it difficult for the client to understand the earnings risk or the costs of selling the product prior to maturity
- Other non-complex financial instruments whereby the criteria that a financial instrument must meet to be regarded as non-complex are specified in detail in Art. 57 Delegated Regulation 2017/565.

SIGMA Bank AG must previously classify other securities as “non-complex” in order to market them as “execution only”.

4.2 Investment advice

Investment advice is defined as the **submission of a personal recommendation to a client** that relates to one or more financial instrument(s). The decision to execute a securities order remains with the client.

SIGMA Bank AG provides **non-independent investment advice**. This means that the advisory services provided by SIGMA Bank AG relate to a limited product range and mainly to financial instruments issued or offered by SIGMA Bank AG or institutions closely linked, legally or economically, to SIGMA Bank AG. Non-independent investment advisory services also mean that SIGMA Bank AG may accept benefits (inducements) from third parties in connection with the provision of investment advice if it complies with the legal requirements for this (for more information, please refer to section 8. Inducements).

In contrast to this, SIGMA Bank AG is not allowed to retain any inducements from third parties when providing **independent investment advice**, but would have to pass them onto its clients in any case. Furthermore, independent investment advice would in any case relate to a broad product range, which is highly diversified in terms of the products available on the market and would not be restricted to products of SIGMA Bank AG or issuers legally or economically linked to it.

Prior to advising you, SIGMA Bank AG will provide you with information on the range of products available, including its relationship to their issuers or providers.

SIGMA Bank AG may only recommend financial instruments that are suitable for you. For this purpose, SIGMA Bank AG will carry out a **suitability test**, where the characteristics of one or more financial instruments are compared with your characteristics (for more information, see section 5. Suitability and appropriateness)).

SIGMA Bank AG does **not** carry out a **regular assessment of the suitability** of financial instruments purchased in the course of providing investment advisory services.

4.3 Portfolio management

Portfolio management is defined as the **management of individual or all financial instruments for individual clients**. Management is based on a power of attorney, which gives SIGMA Bank AG discretion in deciding on the management of the relevant financial instruments (portfolio) on the basis of a previously agreed **investment strategy**.

Should you decide to entrust SIGMA Bank AG with the management of your portfolio, it will conclude a separate **portfolio management agreement in writing**. The investment strategy for management chosen by you or jointly with SIGMA Bank AG will be specified therein and the actual investment decisions will be delegated to SIGMA Bank AG.

To ensure that the portfolio management service is suitable for you, SIGMA Bank AG will carry out a **suitability test**, where the characteristics of the investment strategy or the type of financial instruments to which it relates are compared with your characteristics (for more information, please refer to section 5. Suitability and appropriateness). If the results of the suitability test are negative, SIGMA Bank AG may not provide portfolio management services for you in the intended form.

The financial instruments in which the bank invests in the course of managing your portfolio must be consistently suitable. This means that SIGMA Bank AG will monitor the suitability of the investments it has made for you and will adjust the composition of your portfolio if necessary.

5. Suitability and appropriateness

SIGMA Bank AG must obtain and document certain **information about its clients** to test the suitability and appropriateness of financial instruments. You will be asked for this information in the **investor profile**. This information will usually be collected in discussions with your client advisor during which the investor profile will be completed. In the process, you will be asked questions on the following areas:

- Your knowledge and experience with various forms of investment
- Your financial situation including your ability to bear losses
- Your investment objectives including the period for which you wish to invest, your risk tolerance and your sustainability preferences.

Having answered questions on the areas mentioned, SIGMA Bank AG will be able to determine which financial instruments and investment services match your characteristics. To this end, SIGMA Bank AG classifies the financial instruments that it intends to distribute. For this classification, SIGMA Bank mainly relies on **information from the respective product manufacturer** and determines the **“target market” of the financial instruments**. The target market describes the group of clients for which a financial instrument is **typically suitable or appropriate**. As part of its product monitoring (**“product governance”**), SIGMA Bank AG regularly conducts a review of the target market.

Suitability or appropriateness is tested on the basis of the information it has been given and the target market:

When **testing suitability, knowledge and experience, financial circumstances and investment objectives** are compared. A financial instrument will only be **suitable** for you **if it matches all areas of your investor profile**. SIGMA Bank AG will provide evidence of this match in the **suitability statement**, in which it confirms that the financial instrument in question matches your investor profile in all areas and is therefore suitable for you.

You will be given the suitability statement when you receive **investment advice** from SIGMA Bank AG with the **preliminary information** regarding a securities order. If, having received **investment advice**, an order is placed at your request using telecommunications, SIGMA Bank AG can subsequently transmit this to you on a durable medium.

In the case of **portfolio management**, you will receive the **suitability statement** as part of the “Portfolio valuation” for your portfolio (for more information, please refer to section 6. Client information and reporting).

In the case of the **appropriateness test**, only your **knowledge and experience** will be compared with the relevant target market for a financial instrument. This means that a financial instrument may be appropriate for you despite not matching your financial circumstances or investment objectives. The appropriateness test focuses on the fact that you **can understand the financial instrument in question and the risks associated therewith**. Should a financial instrument not be appropriate for you, SIGMA Bank AG will **warn** you about the **associated risks** in the **preliminary information** before you make the preferred investment. In this case, you can, of course, still opt to make the investment.

There are specific features for “**professional clients**” and “**eligible counterparties**” associated with the suitability and appropriateness tests. For these, SIGMA Bank AG may expect them to have the necessary **knowledge and experience** to understand those financial instruments and their risks. SIGMA Bank AG may also expect them to have sufficient **financial resources**, to bear the risks of their investments. This means that these two elements do not preclude a financial instrument from being suitable or appropriate for “professional clients” or “eligible counterparties”. “Professional clients” and “eligible counterparties” do not receive a suitability statement either. However, the suitability test is also carried out – to a limited extent – for these clients.

Should several people be holders or authorized signatories for a securities account or make use of an investment service provided by SIGMA Bank AG, then each person’s knowledge and experience will be queried but the financial circumstances and investment objectives will be recorded for the group as a whole. If all the people of relevance in this connection have the same knowledge and experience, a consolidated investor profile will be prepared for all these people.

To assess the knowledge and experience of legal entities, SIGMA Bank AG uses the knowledge and experience of the natural persons acting for the legal entity vis-à-vis SIGMA Bank AG.

In its assessment, SIGMA Bank AG relies on the information provided by you, which it assumes to be accurate. Should you not have provided SIGMA Bank AG with the information it needs or only provided some of this information, SIGMA Bank AG may under certain circumstances be unable to **test the suitability or appropriateness** of the planned investment. If SIGMA Bank AG is unable to carry out a suitability test, it will be unable to provide you with any investment advisory or portfolio management services. If SIGMA Bank AG cannot carry out an appropriateness test, it will **warn** you of the risks associated with your securities order before accepting it. It is therefore in your own interest to provide SIGMA Bank with the requisite information.

6. Client information and reporting

You will be provided with all the **information prescribed by law** before and after SIGMA Bank AG provides investment services. You will be given general information when you open a securities account, the latest version of which can be accessed on the SIGMA Bank AG website. You will receive specific information, which relates to you alone, via the agreed communication channels.

In particular, specific information is:

- Information about your client classification (“non-professional client”, “professional client”, “eligible counterparty”) with the “Account agreement” or subsequently with the “Reclassification according to MiFID”
- Information about the expected costs and charges for the provision of investment services (as an estimate), including an illustration of the expected effects of costs and charges on your return with the “Preliminary information for securities orders” (ex-ante)
- Confirmation of execution for your securities orders with the “Securities purchase” (ex-post)
- Regular reports on your assets with SIGMA Bank AG with the “Portfolio valuation”
- Regular reports on the actual costs and charges incurred following the provision of investment services with the “Portfolio valuation” (ex-post)
- Regular reports on the performance of your portfolio managed by SIGMA Bank AG, including an illustration of the actual effects of the costs and charges on your return with the “Portfolio valuation”
- Event-driven reports if one of your portfolios managed by SIGMA Bank AG loses at least 10% of its value (loss threshold reporting).

In addition, you have the right to receive at any time a detailed itemized statement of the actual costs and fees incurred after the provision of investment services (ex-post).

The specific information and reports that you will receive from SIGMA Bank AG are dependent on the investment services you make use of.

When presenting costs, SIGMA Bank AG is reliant on the provision of data from product providers and information service providers. They may use different settlement dates, different prices (e.g. daily mid-prices, market closing prices) and, if foreign currencies are involved, different translation rates and translation dates. This may lead to discrepancies as well as settlement and rounding differences.

The client information and terms and conditions of SIGMA Bank AG that you have been given will be updated on an ongoing basis, as required. SIGMA Bank AG reserves the right to inform you of key changes, in particular, using the agreed communications channel (such as by mail or by electronic communication).

7. Dealing with possible conflicts of interest

SIGMA Bank AG will take all necessary measures to recognize any conflicts of interest, which may arise when providing securities and ancillary services or from a combination thereof and be prejudicial to a client's interests, and prevent them accordingly. More detailed information regarding this can be found in the document entitled **"Information about dealing with possible conflicts of interest"** in your documents or on the SIGMA Bank AG website.

8. Inducements

When providing investment services, SIGMA Bank AG may, subject to certain requirements, accept inducements (such as retrocessions, acquisition commissions, fees) from third parties or grant them to third parties if this will improve the quality of the service supplied to the client and the acceptance or granting of these inducements is disclosed to the client affected by it.

Detailed information on how SIGMA Bank AG deals with inducements can be found in the document entitled **"Information about dealing with possible conflicts of interest"** in your documents or on the SIGMA Bank AG website.

9. Principles of order execution ("best execution")

SIGMA Bank AG undertakes to provide investment services truthfully, honestly and professionally and in the best interests of its clients. In the process, SIGMA Bank AG takes measures to the best of its judgment to ensure the best execution of securities orders that you place with SIGMA Bank AG. A detailed description of the principles governing the execution of your orders by SIGMA Bank AG and a list of the execution venues that SIGMA Bank AG relies on for securities orders can be found in the document entitled **"Principles for the execution of orders involving financial instruments ("best execution policy")** in your documents or on the SIGMA Bank AG website. A report, which is prepared once a year, on the top 5 execution venues per type of financial instrument, in which SIGMA Bank AG clients' orders were executed in the previous year, can be found on the SIGMA Bank AG website ("MiFID II RTS 28 Report").

10. Recording of communication and storage of documents

SIGMA Bank AG will record any communication associated with investment services provided by SIGMA Bank AG that is conducted by telephone or electronically. These recordings will be saved and stored for at least five years. If requested by the competent supervisory authority (FMA Liechtenstein), recordings are to be stored for up to seven years. The relevant recordings will be made available to you on request.

SIGMA Bank AG will store all documents containing the rights and obligations of those involved in the services agreement for the entire duration of the business relationship and all other recordings for at least five years.

11. Information about the safeguards for client assets

SIGMA Bank AG has established appropriate organizational and contractual measures to protect the rights of clients for whom SIGMA Bank AG holds securities or funds.

11.1 Separation of client portfolios

SIGMA Bank AG always maintains correct and comprehensible accounts for the securities and funds it holds, which allow it to distinguish one client's securities and funds from its own portfolio and from every other client's portfolio. The accounts/securities accounts will be managed via the name or company of the account/securities account holder and a number.

This means that clients will be able to prove their rights arising from the securities or funds posted in their accounts in the event of any dispute or insolvency. Furthermore, the recordings also allow correct allocation of securities/funds in the event of losses through collective safe custody, which are borne by co-owners in the collective portfolio in the ratio of their shares.

11.2 Collective holdings and third-party safe custody

Securities transferable in giro transactions, including blank endorsed securities that are registered, are mostly held in safe custody by SIGMA Bank AG under its own name at a securities depository (third-party custodian).

The third-party custodian will usually hold these securities in an omnibus account. They will only be stored in (individual) separate accounts if requested specially by the client or if the securities cannot be stored in collective custody.

In the case of omnibus accounts, all securities of the same class that SIGMA Bank AG holds for its clients are stored jointly in a securities account. Here, the depositors of the securities obtain joint ownership of the collective holding and are entitled to have securities released from the collective holding in the amount they have deposited. In the case of separate accounts, the depositors obtain sole ownership of the securities they have deposited.

If the securities are stored in Liechtenstein, securities deposited in separate or omnibus accounts will be withdrawn and given to the client as owner or as joint owner if the third-party custodian becomes insolvent. As a result, the securities deposited in Liechtenstein are protected in the event of the custodian or third-party custodian becoming insolvent.

Securities purchased abroad are usually deposited with a third-party custodian abroad. This is the case if SIGMA Bank AG executes purchase orders in foreign or domestic securities abroad, as commission agent, or sells the client foreign securities that are not traded via a trading venue or outside a trading venue in Liechtenstein or are usually purchased abroad via a fixed-price agreement.

For storage abroad, SIGMA Bank AG usually tasks either a foreign custodian or a domestic custodian that itself tasks depositories abroad to carry out foreign storage (custody chain). SIGMA Bank AG only entrusts companies with storage abroad that are authorized to store and manage securities and are subject to supervision.

Deposited securities are reconciled with the third-party custodian on an ongoing basis as long as they remain in custody. For this purpose, each security deposited with a third-party custodian will be compared with the total amount posted in the systems of SIGMA Bank AG (comparison with the volume stored with a depository).

Storage abroad is subject to the T&Cs of the respective custodian and the legal provisions and usages of the place of custody. The place of custody is usually the country in which the security was posted with a central securities depository for the first time.

If SIGMA Bank AG is unable to obtain ownership or joint ownership of the securities for its clients in the case of storage abroad, it will ensure, in its clients' best interests, that its clients have a similar legal position and

will maintain this legal position for its clients on a fiduciary basis.

To guarantee that client portfolios can be separated vis-à-vis third-party custodians, SIGMA Bank AG will inform the foreign custodian that the securities deposited by its clients are not part of its own portfolio and that, as the securities account holder, SIGMA Bank AG does not have any rights of any kind to them.

In addition, SIGMA Bank AG will seek contractual assurances from the depositories tasked by it (3 points declaration):

- it has noted the ownership of the client portfolio
- that liens, rights of retention and similar rights will only be asserted on account of such claims that arise from the purchase, management and storage of the deposited securities and that SIGMA Bank AG is notified immediately of seizures by third parties or other enforcement measures in relation to the deposited securities and
- that the foreign custodian is not authorized without the consent of the domestic custodian bank to entrust a third party with the effective storage of the deposited papers or to take them to a foreign country.

Should a custodian not be able to make these assurances for legal reasons, SIGMA Bank AG will seek confirmation of the legal requirements precluding the provision of this assurance by obtaining a legal opinion.

In the event of losses caused by depositories tasked by SIGMA Bank AG, SIGMA Bank AG will be liable for the fault of the third-party custodian as for its own fault unless explicitly agreed otherwise or the securities are stored with a specific third-party custodian on the explicit instruction of the client. With regard to companies, liability is restricted to fault in selecting the third-party custodian. Unless SIGMA Bank AG is liable to its clients anyway, it will assert its claims under the custody agreements vis-à-vis its depositories and pass any compensation payments received to the clients affected by the case of loss pro rata.

An overview of third-party custodians used by SIGMA Bank AG can be found in the document entitled “Sub-custodians of SIGMA Bank AG” on the SIGMA Bank AG website.

11.3 Client funds in foreign currency

In the event of losses that SIGMA Bank incurs through holding client funds in foreign currency for which it is not responsible, the holders of credit balances in this currency will be liable pro rata up to the amount of their credit balance.

11.4 Use of funds and securities

The securities and funds deposited may only be disposed of by the client himself or by SIGMA Bank AG on the basis of an authorization or a financial collateral agreement explicitly issued by the client.

In this connection, it should be noted that SIGMA Bank has a security interest, lien and offset right to the funds or securities held for this client to secure its claims arising from the business relationship with a client in accordance with its General Terms and Conditions.

Before carrying out an order to dispose of deposited securities and funds, the credentials and power of representation of the person issuing the order will also be carefully checked to avoid improper use of the deposited assets.

SIGMA Bank AG emphasizes the fact that the assets held for its clients by SIGMA Bank AG are not used for its own account or for the account of another client unless the client has explicitly agreed to the usage on previously defined terms.

In the event of SIGMA Bank AG being insolvent, the account and securities account holder may only make use of their account, securities account or credit balance following prior agreement from the court. Claims to have the funds or securities held released must be registered with the competent insolvency court.

Details on the procedures in the event of financial institutions becoming insolvent and on investor compensation and deposit guarantee schemes can be found in the document entitled “Information for depositors” in your documents and on the SIGMA Bank AG website.

12. Complaints management

SIGMA Bank AG has established a process for managing complaints. More detailed information on this process and whom you should turn to in the event of a complaint can be found in the document entitled **“Complaints management”** on the SIGMA Bank AG website.