

General Client Information

This «General Client Information» satisfies the requirements for the duty to provide information about Octa Wealth Ltd (hereinafter referred to as the «Asset Manager») under the Swiss Federal Act on Financial Services (hereinafter referred to as «FINSA»). The client will be informed in particular about client classification, the financial services offered and risks therewith, the best execution, the measures to prevent dormant accounts and how to initiate mediation proceedings before the ombudsman's office. This information may be amended from time to time. The latest version of the «General Client Information», which should not be considered as advertising, can be found on the website of the Asset Manager at <https://www.octawealth.com/> or obtained in print at our business address.

Information about the costs and fees of the financial services offered will be provided to the client in the respective annex to the financial services agreement.

For information on risks generally associated with financial instruments, please refer to the brochure "Risks Involved in Trading Financial Instruments" published by the Swiss Bankers Association, made available on the Internet at <https://www.swissbanking.ch/>.

1. Information about the Asset Manager

1.1 Name and address

Name	Octa Wealth Ltd
Address	Talstrasse 62
Zip code / place	8001 Zurich, Switzerland
Phone	+41 44 266 888 0
Email	welcome@octawealth.com
Website	www.octawealth.com
VAT-Nr.	CHE-229.709.787

1.2 Field of activity

The Asset Manager has its registered office in Zürich. The Asset Manager offers the following financial services: asset management services, investment advisory services, execution only services

1.3 Supervisory authority and audit firm

Under the new Financial Institutions Act (FINIG), all financial institutions will in future require a licence from FINMA to carry out their professional activities as asset managers. The financial institution received its licence on 06.12.2023 and is supervised by the supervisory organisation AOOS - Schweizerische Aktiengesellschaft für Aufsicht. The financial institution is audited by the auditing company CAPREV Wirtschaftsprüfung und -beratung AG both in terms of supervision and obligations. The address of the supervisory organisation AOOS - Schweizerische Aktiengesellschaft für Aufsicht and the auditing company CAPREV Wirtschaftsprüfung und -beratung AG can be found below: The Asset Manager is currently regulated by the following supervisory authority:

Name	AOOS – Schweizerische Aktiengesellschaft für Aufsicht
Address	Clausiusstrasse 50
Zip code / place	8006 Zürich, Schweiz
Phone	+41 44 215 98 98
Email	info@aos.ch
Website	www.aos.ch

Name	CAPREV Wirtschaftsprüfung und -beratung AG
Address	Industriestrasse 47
Zip code / place	6300 Zug
Phone	+41 41 761 92 45
Email	info@caprev.ch
Website	www.caprev.ch

1.4 Professional secrecy

The Asset Manager is subject to professional secrecy in accordance with FINIA.

1.5 Client communication

The company language of the Asset Manager is German. The client can communicate with the Asset Manager at any time in German English. Contractual documentation is available in German and English. As a rule, the Asset Manager will communicate with the client by letter. If the client contacts the Asset Manager electronically, e.g. via E-mail, the Asset Manager reserves the right to answer through the same channel. In this respect, the Asset Manager clearly points out that the use of e-mail involves certain confidentiality risks.

2. Client segmentation

FINSA defines the following segments for clients of financial service providers: «private clients», «professional clients» and «institutional clients». Each category is assigned a different level of investor protection (e.g. with regard to information duties, suitability and appropriateness obligations, and documentation and accountability duties).

The Asset Manager will classify its clients as either private clients, professional clients or institutional clients.

2.1 Private clients

The Asset Manager will treat clients as private clients unless clients are informed otherwise. Private clients receive the highest level of investor protection. They must be given extensive information regarding product risk, e.g. Key Information Document (KID), before a service can be provided or a trade can be executed. The range of financial instruments available is generally limited to products targeted at private clients or to products explicitly registered for distribution to private clients.

2.2 Professional clients

Professional clients are treated as sophisticated investors who have a lower level of investor protection than private clients, based on their level of knowledge and experience and their ability to bear financial losses.

Some rules of conduct do not apply to professional clients (e.g. provisions of KID). Professional clients are eligible for a larger investment universe, including financial products targeted at professional clients only or products not registered for distribution to private clients.

2.3 Institutional clients

Institutional clients are generally regulated financial institutions such as banks and insurance companies.

Given their structure, experience, and financial resources, these clients are considered highly sophisticated and typically do not require any protection or only to a limited extent. Therefore, the lowest protective measures under FINSA apply to them.

2.4 Reclassification

Insofar as the client is not already classified by law as a professional client («per-se professional client») the private client is, provided the legal requirements are met, entitled to request in writing from the Asset Manager at any time a change in their client segment to a professional client («opting-out»). However, it is not possible to opt out for individual services or particular classes of financial products only; but only for the whole business relationship with the Asset Manager.

Clients who have been reclassified as professional clients can decide at any time to opt into the private client segment again («opting-in»). Institutional clients may also request to be treated as professional clients («opting-in»).

2.5 Qualified investor in accordance with the collective investment scheme act (CISA)

When considering collective investment schemes, professional clients as well as private clients who have entered into a discretionary or an advisory mandate agreement are by law considered as qualified investors.

3. Information about the financial services offered by the Asset Manager

3.1 Discretionary asset management

Discretionary asset management consists of the Asset Manager managing the client's assets deposited with a custodian bank in the name, on account and at the risk of the client. The Asset Manager carries out transactions at its own discretion and without consultation with the client. The Asset Manager ensures that any transaction executed by the Asset Manager is in line with the client's financial situation and investment objectives, as well as the investment strategy agreed with the client, and ensures further that the structuring of the portfolio is suitable for the client.

Discretionary asset management services grant the client the right to have the assets managed in the client's portfolio. The Asset Manager applies due care when selecting the investments to be included in the portfolio from within the investment universe. The Asset Manager shall ensure an appropriate diversification of risk in the confinements of the investment strategy. The Asset Manager monitors the managed assets regularly and ensures that the investments are in line with the agreed investment strategy and suitable for the client.

The Asset Manager shall, as agreed, report on the agreed and provided asset management services to the client on a regular basis.

3.2 Comprehensive investment advice

Within the scope of comprehensive investment advice, the Asset Manager advises the client on transactions with financial instruments, while considering the client's portfolio. For this purpose, the Asset Manager ensures that the recommended transaction corresponds to the client's financial situation and investment objectives (suitability assessment), as well as the client's needs or, respectively, the investment strategy agreed with the client. Subsequently, the client shall decide at its discretion to what extent the client wishes to follow the Asset Manager's recommendation.

Comprehensive investment advisory services grant the client the right to receive personal investment recommendations suitable to the client. Comprehensive investment advice is provided in relation to financial instruments within the scope of the investment universe. The Asset Manager shall advise the client to the best of his knowledge and belief and with the same level of care that he applies in his own affairs.

If agreed, the Asset Manager shall regularly review the structuring of the portfolio subjected to the comprehensive investment advice as to its conformity with the agreed investment strategy. If deviations are identified to the agreed percentages for the portfolio structuring, the Asset Manager shall recommend corrective measures to the client.

The Asset Manager shall promptly inform the client of any significant difficulties which may affect due processing of orders. Furthermore, the Asset Manager shall report on the agreed and provided investment advisory services to the client on a regular basis.

3.3 Transaction-based investment advice

Within the scope of transaction-based investment advice, the Asset Manager advises the client with regard to individual transactions with financial instruments, without considering the client's portfolio. For this purpose, the Asset Manager considers the client's knowledge and experience (appropriateness) as well as the client's needs and, based thereon, provides personal recommendations to the client for the acquisition, disposal, or holding of financial instruments. The client shall decide at its discretion to what extent the client wishes to follow the Asset Manager's recommendation. The client will retain full responsibility for the structuring of the client's portfolio. The composition of the portfolio and the suitability of a financial instrument for the client, i.e., whether a financial instrument corresponds to the investment objectives and financial situation of the client, will at no time be reviewed by the Asset Manager.

Transaction-based investment advisory services grant the client the right to receive personal investment recommendations. Transaction-based investment advice is provided in relation to financial instruments within the scope of the investment universe. The Asset Manager shall advise the client to the best of his knowledge and belief and with the same level of care that he applies in his own affairs.

The Asset Manager shall promptly inform the client of any significant difficulties which may affect due processing of orders. Furthermore, the Asset Manager shall report on the agreed and provided investment advisory services to the Client on a regular basis.

3.4 Execution of transactions (Execution Only)

The scope of execution of transactions (execution only) is limited to the transmission of client orders by the Asset Manager without the provision of any advisory or asset management services. In the context of such execution of transactions, orders are exclusively initiated by the client and are transmitted by the Asset Manager. The Asset Manager will not review any such transactions as to their conformity with the client's knowledge and experience (appropriateness), or with the client's financial situation and investment objectives (suitability). The Asset Manager shall not reiterate that no appropriateness or suitability assessment will occur on the occasion of future client orders.

Execution only agreements grant the client the right to place orders to acquire or dispose of financial instruments within the scope of the investment universe. The Asset Manager shall apply the same level of care as he applies in his own affairs when transmitting orders of the client for execution.

The Asset Manager shall promptly inform the client of any significant difficulties that may affect due processing of orders. Furthermore, the Asset Manager shall regularly report on the agreed and provided services to the client.

3.5 Investment universe

The investment universe when selecting financial instruments covers only third-party financial instruments. Within the scope of the financial services, the Asset Manager considers all types of financial instruments from a wide range of providers / issuers.

3.6 Appropriateness and suitability assessment

When providing discretionary asset management and advisory services, the Asset Manager has a legal obligation to consider whether the services and financial instruments recommended are suitable for the client. Therefore, the Asset Manager is required to obtain diverse information from the client. This includes – where relevant – information about:

- Knowledge and experience («K&E») of the client with regard to investing
Information with respect to the type of services and transactions with financial instruments with which the client is familiar, and the type, scope, and frequency of transactions in financial instruments undertaken by the client, the client's level of education and profession or former professional activities.
- The client's investment objectives
Information about the intended investment purpose, the investment timeframe, the capacity and willingness to take risks as well as any investment restrictions.
- Financial situation of the client
Information about the nature and amount of regular income, total assets, including liquid assets and real estate, current and future financial obligations and the ability to bear losses.

Only when the Asset Manager has obtained this information, is it able to recommend suitable transactions in financial instruments or, in connection with asset management and comprehensive investment advice, to propose a suitable investment strategy. The Asset Manager only considers services and financial instruments suitable if a suitability assessment indicates

- they correspond with the client's investment objectives and personal circumstances;
- their investment risks can be financially borne by the client;
- that the client has the knowledge and experience to be able to understand risks involved.

If a client has been classified as a professional client, the Asset Manager assumes that the client has the necessary knowledge and experience.

In case of transaction-based investment advice the Asset Manager will only assess whether the client is able to understand the nature and risks associated with a financial instrument before placing the order (appropriateness assessment). This assessment is based on the K&E information received from the client. If a financial instrument is deemed inappropriate, the Asset Manager will either educate the client on the respective instrument or warn the client that their K&E is not sufficient to understand the risks associated with the financial instrument.

In order to assess the appropriateness of a transaction, the Asset Manager verifies the K&E of the person placing the order, which might be the client, a representative, or an authorised signatory holder for a company

In case of execution only transactions, irrespective of the client classification, the Asset Manager does not check whether the corresponding business is appropriate with regard to the client's K&E.

3.7 The risks associated with financial services

When providing financial services, depending on the type of service, the following risks generally arise, which are in the client's risk sphere and, therefore, are borne by the client:

- ***Risk of the selected investment strategy:*** Different risks may arise from the investment strategy selected by and agreed with the client (see below). The client will bear these risks to their full extent. An overview of the risks is provided, and respective risk disclosures are made before the investment strategy is agreed upon.
- ***Asset preservation risk,*** or, respectively, the risk that financial instruments in the portfolio may lose value: This risk, which may vary depending on the respective financial instrument, is borne in full by the client. For risks of individual financial instruments, reference is made to the brochure "Risks Involved in Trading Financial Instruments" of the Swiss Bankers Association.
- ***Information risk on the part of the Asset Manager*** or, respectively, the risk that the Asset Manager is provided with insufficient information to make an informed investment decision and to make a suitable and/or appropriate investment recommendation: Should the client provide the Asset Manager with insufficient or inaccurate information regarding, as the case may be, the client's financial situation, investment objectives, knowledge, experience, and/or needs, the potential risk arises that the Asset Manager will not be able to make investment decisions that are suitable for the client or will not be able to provide advice suitable and/or appropriate for the client.

- ***Risk of qualified investors in collective investment schemes:*** Clients taking advantage of services within the framework of a long-term asset management or investment advice relationship are considered qualified investors within the meaning of CISA. Qualified investors have access to specific types of collective investment schemes open exclusively to such qualified investors. The status of qualified investor allows consideration of a broader range of financial instruments in the design of the portfolio. Collective investment schemes for qualified investors may be exempt from certain regulatory requirements. Such financial instruments may therefore not or only partially be subject to pertaining Swiss regulation. This may result in heightened risks, in particular, of liquidity, investment strategy, or transparency. Detailed information on the risk profile of a particular collective investment scheme can be found in the constitutional documents and, where applicable, in the key information document and the prospectus.
- ***Information risk on the part of the client*** or, respectively, the risk that the client is in possession of insufficient information to make an informed investment decision: The client will – within the framework of investment advice and execution only services – take the investment decisions. Accordingly, the client requires specialist knowledge to understand financial instruments and sufficient time to deal with financial markets. In this context, the potential risk arises for the client to invest in a financial instrument that is inappropriate for the client due to missing or inadequate knowledge and experience. Missing or inadequate financial knowledge of the client may also lead the client to make investment decisions which are not in conformity with the client's financial situation and/or investment objectives.
- ***Risk with regard to timing when placing orders,*** or, respectively, the risk of the client's delayed placement of orders for acquisition or disposal following an investment advice, which may lead to price losses: Any recommendation made by the Asset Manager will be based on the market data available at the time of the consultation and, due to market dependency, shall be valid only for a short period of time.
- ***Risk of inadequate monitoring*** or, respectively, the risk that the client monitors the portfolio inadequately or fails to monitor the portfolio altogether: The Asset Manager will in connection with the comprehensive investment advice service, if agreed, review the composition of the portfolio prior to issuing an investment recommendation. However, the Asset Manager will at no point in time have any duty to monitor, advise, warn, or inform with respect to the quality of the individual positions and/or the structuring of the portfolio. Therefore, inadequate monitoring of the portfolio by the client may entail various risks, such as cluster risks.

Furthermore, financial services entail risks that are within the Asset Manager's risk sphere and for which the Asset Manager shall generally be liable to the client. The Asset Manager has taken appropriate measures to mitigate these risks, in particular by observing the principle of good faith and the principle of equal treatment when processing client orders. Furthermore, the Asset Manager ensures the best possible execution of client orders.

4. Data protection

The Asset Manager has to comply with the relevant data protection legislation. For further details, we refer to the latest version of the «Data Protection Declaration», which can be found on the Asset Manager's website under <https://octawealth.com> or can be obtained in print at our business address.

5. Dealing with conflicts of interest

Conflicts of interest of the Asset Manager may arise when:

- financial benefits can be obtained, or financial losses avoided at the expense of clients and in breach of good faith;
- interests in the outcome of financial services rendered to certain clients run contrary to those of other clients;
- financial or other incentives linked to the provision of financial services to certain clients lead to outweighing the interests of such clients over the interests of other clients; or
- incentives from third parties in the form of monetary or non-monetary benefits or services, which are related to financial services provided to clients, are accepted.

Conflicts of interest may arise in connection with providing financial services in particular from the coincidence of:

- multiple client orders;
- client orders and the Asset Manager's own orders or other proprietary interests of the Asset Manager or, respectively, its affiliates; or
- client orders and transactions of the Asset Manager's employees.

The Asset Manager may accept compensation from third parties when providing financial services to clients. The Asset Manager shall inform clients about the nature, scope, parameters of calculation, and range of compensation from third parties which may accrue to the Asset Manager in the provision of financial services. The client irrevocably waives any rights to any third-party compensation and agrees that the Asset Manager shall retain such compensation.

Intermediaries who refer clients to the Asset Manager may receive a share of or the entire management fee/expense remuneration from the Asset Manager.

As part of the provision of financial services, the Asset Manager may receive minor non-monetary benefits from third parties. This may include, but is not limited to, product or service information or documentation, promotional material for new issues, participation in educational events, hospitality or other minor non-monetary benefits to enhance service quality

In order to best identify, avoid, and mitigate conflicts of interest, the Asset Manager has issued internal directives and taken organisational measures (e.g. rules on accepting gifts, rules with regard to employee account transactions; approval and review process for external mandates and secondary employment).

If the measures implemented cannot prevent disadvantages for clients, or only with a disproportionate amount of effort, the Asset Manager discloses the conflict in an adequate manner.

6. Dormant Accounts

Contact with clients may be broken off, leading the assets entrusted to the Asset Manager to become dormant. Such assets may be in danger of being permanently forgotten by clients and their heirs. The following measures are recommended to avoid contactless or dormant assets:

- **Address and name change:** Notification of the Asset Manager immediately on changes related to the client's domicile, address, or name.
- **Special Instructions:** Information to the Asset Manager about longer absences of the client and about possible redirection of correspondence to a third-party address as well as about the client's availability in urgent cases during such absences.
- **Granting of powers of attorney:** It may be advisable for the client to designate an authorized agent whom the Asset Manager can approach in the event of the contact having broken off.
- **Orientation of trusted persons and testamentary disposition:** Further options to avoid contactless and dormant assets include for the client to inform a trusted person of the relationship with the Asset Manager. clients should note that the Asset Manager shall provide information to such trusted person only if having been authorized to do so in writing. Furthermore, the relevant assets may be mentioned, for example, in a testamentary disposition.

The client is responsible for ensuring that the contact with the Asset Manager does not cease. In this context, the client also informs the Asset Manager about his expected legal successors. If the client does not wish to provide relevant information in this regard, the client is made aware of the risks associated with dormancy. For this purpose, reference is made to the corresponding leaflet of the Swiss Bankers' Association, which contains information on assets without contact and dormant assets as well as on the associated risks and is available at <https://www.swissbanking.ch/en/financial-centre/information-for-bank-clients-and-companies/dormant-assets>.

7. Ombudsman's office

The client's satisfaction with our services is our main concern. Should the Asset Manager have concluded to reject a claim made by the client, the client may initiate a mediation proceeding through the ombudsman's office. For this purpose, the client may contact:

Name	Finanz Ombudsstelle Schweiz (FINOS)
Address	Talstrasse 20
Zip code / place	8001 Zürich
Phone	+41 44 552 08 00
Email	info@finos.ch
Website	www.finos.ch