

Twelve Capital (DE) GmbH Disclosure Brochure

About us

Twelve Capital (DE) GmbH (“TCDE”, “the firm”, “us”, “we”) is a securities institution (*Wertpapierinstitut*) regulated by the Bundesanstalt für Finanzdienstleistungsaufsicht (BaFin, Marie-Curie-Str. 24-28, 60439 Frankfurt a.M., www.bafin.de) in Germany. Twelve Capital (DE) GmbH is a direct subsidiary of Twelve Capital Holding AG, Switzerland. Further information about the Twelve Capital Group can be found on the group website www.twelvecapital.com.

The firm is licenced to provide the following investment services: investment brokering (Sec. 2 para 2 No. 3 WpIG) and investment advice (Sec. 2 para 2 No. 4 WpIG) and provides such services exclusively for products managed by the Twelve Capital Group (portfolio manager: Twelve Capital AG). The firm only deals with (elective) professional clients and (elective) eligible counterparties.

Twelve Capital (DE) GmbH is assigned to the German investor compensation scheme „Entschädigungseinrichtung der Wertpapierhandelsunternehmen“ (EdW), 10865 Berlin, <https://www.e-d-w.de/>.

Contact details

You can contact Twelve Capital (DE) GmbH by mail, phone or email:

Twelve Capital (DE) GmbH
Theatinerstr. 11, 80333 Munich, Germany
info(at)twelvecapital.com
+49(0)89 839316 110

Business language

Communication with Twelve Capital (DE) GmbH may be in German or English. All documents and information will usually be provided in English unless agreed or required for regulatory purposes to be provided in German.

Complaints handling

The firm maintains a Complaints policy for the effective handling and swift resolution of client complaints. All complaints will be handled objectively and independently and can always be submitted free of any charges.

If you wish to complain about Twelve Capital (DE) GmbH, its services, products or employees, please send an email with the details of your complaint to [compliance\(at\)twelvecapital.com](mailto:compliance(at)twelvecapital.com) or contact the local complaints handling function by mail or phone:

Erasmus Faber, Compliance, Twelve Capital (DE) GmbH, Theatinerstr. 11, 80333 Munich, Telephone: +49 (0)89 839316 112.

Please provide your contact details together with the facts on which the complaint is based, including the product or service in question. Any complaint will be investigated fully and a confirmation of receipt will be provided. You will be kept informed thereafter

of the progress of measures being taken and a preliminary resolution of the matter will be provided on a basis of ten (10) working days. A final decision will be provided within eight (8) weeks or if not practicable an explanation will be provided indicating when the complaint will be likely resolved.

A complaint may also be filed with BaFin:

Bundesanstalt für Finanzdienstleistungsaufsicht, Marie-Curie-Straße 24-28, 60439 Frankfurt am Main, Fax: + 49 (0)228 4108-1550, email: poststelle@bafin.de.

Consumers can also file an application for arbitration with BaFin in German: Schlichtungsstelle bei der Bundesanstalt für Finanzdienstleistungsaufsicht, Referat ZR 3, Graurheindorfer Str. 108, 53117 Bonn, email: schlichtungsstelle@bafin.de.

Communication recording and recordkeeping

The communication methods used by Twelve Capital (DE) GmbH with (potential) clients and investors include email or phone. The firm is required to maintain records of relevant communications and conversations (any communication and conversation which results or which intends to result in a client order, transaction or the provision of an investment service) for a period of five years. All email and other electronic communication channels as well as phone calls are recorded. You can inform Twelve Capital (DE) GmbH that you object to a conversation being recorded prior to starting any communication (in which case such conversation cannot take place via that method) or ask for a copy of the relevant recording.

Conflicts of interest policy

The Twelve Capital Group maintains a conflict of interest policy which aims to identify, record, report, manage, avoid and disclose conflicts of interests.

Conflicts of interests may arise between the firm (including its managers or employees) and a client or a service provider, or between two or more clients. The firm takes all appropriate steps to identify such conflicts by taking into account, inter alia, if the firm (i) is likely to make a financial gain, or avoid a financial loss, at the expense of the client, (ii) has an interest in the outcome of a service provided to the client or of a transaction carried out on behalf of the client, which is distinct from the client's interest in that outcome, (iii) has a financial or other incentive to favour the interest of another client or group of clients over the interests of the client or (iv) receives or will receive from a person other than the client an inducement in relation to a service provided to the client, other than the standard commission or fee for that service.

When the firm has identified a conflict of interest, it will record and report such conflicts to its management at least on an annual basis.

When managing and trying to avoid conflicts of interest, the firm places the clients interests first at all times without exception. The firm must not provide services in a manner that will advance one client's interests unfairly ahead of another client's interests. The firm takes steps to prevent the crystallisation of conflicts of interest by inter alia using information barriers, functional independence and a regular review of remuneration rules. Termination of an activity causing a conflict of interest can be a means to ultimately avoid such conflicts of interests.

Where a conflict of interest cannot be managed in a practical or suitable enough way to ensure that the interests of clients are adequately protected, it may be appropriate to disclose the conflict of interest to the affected client(s).

Client reporting

Investors will receive monthly fact sheets on the performance of the products they are invested in. Additional information will be provided as and when agreed. Additional regulatory required documents are provided via the fund manager (links in product information section).

Inducements

TCDE does not receive inducements from external third parties regarding the services provided. TCDE receives payments via intra-group transfer pricing arrangements for its distribution services from its sister company, Twelve Capital AG in Zurich, Switzerland. These intra-group payments are TCDE's only source of income.

Costs and charges

TCDE does not directly charge any fees to investors for the services it provides. Investors will be charged by the fund manager the costs and charges disclosed in the relevant funds documentation (prospectus/ private placement memorandum, (semi-) annual reports, KIID) for the manufacturing and managing of the funds.

Product information

The relevant fund documentation (prospectus / private placement memorandum, (semi-) annual reports, KIID, tax and ESG disclosure documents where applicable) and the information about costs and charges of the individual products can be accessed here:

Twelve Capital labelled funds: <https://www.credit-suisse.com/microsites/multiconcept/en/our-funds.html>

JSS labelled funds: www.jsafrasarasin.ch/funds

All funds: <https://www.twelvecapital.com/products/>

LEI

Twelve Capital (DE) GmbH has the following Legal Identifier Number: 549300NG90TWBLRVPQ36

This document contains information about Twelve Capital (DE) GmbH and its business practices. Any queries regarding this document and the information contained herein should be directed to the Head of Compliance Dr. Erasmus Faber (telephone: +49 (0)89 839316 112, email: erasmus.faber@twelvecapital.com).

Date of last review: 1st of August 2022