

Twelve Capital AG Disclosure Brochure

Information about us and our regulatory status

Twelve Capital AG ("TCAG", "Twelve", "the firm", "us", "we") is incorporated in Switzerland and is authorised and regulated by the Swiss Financial Market Supervisory Authority (FINMA).

Twelve Capital AG is a wholly owned 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 licensed to conduct investment business in Switzerland and is obliged to comply with the provisions of the Swiss Collective Investment Schemes Act, the Swiss Financial Services Act and the Swiss Financial Institutions Act together with any generally applicable legislation.

TCAG has the following Legal Identifier Number (LEI): 549300Y647UICM1NQT21

Contact details

You can contact Twelve Capital AG by mail, phone or email:

Twelve Capital AG
Dufourstrasse 101
8008 Zurich, Switzerland
info(at)twelvecapital.com
+41 (0) 44 5000 120

Business language

Communication with Twelve Capital AG 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.

Offered investment universe and product information

Twelve Capital offers a variety of financial services, with a focus on the administration of financial instruments (portfolio management). When rendering financial services, Twelve offers financial instruments that are offered, managed, developed or administered by Twelve. However, in some exceptional cases, Twelve may offer third-party products.

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 fees 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/>

Risk information

Transactions with financial instruments involve opportunities and risks. It is important that you understand these risks before using an investment service. In the brochure "Risks Involved in Trading Financial Instruments" published by the Swiss Bankers Association (SBA) you will find important information about the typical risks taken when investing in financial instruments. This brochure is available on the Twelve website at <https://www.twelvecapital.com/regulatory-reporting/>. You can also obtain it from your client relationship manager.

Further descriptions of the specific risks associated with products managed by the Twelve Capital Group can be found in the relevant fund documentation as referenced in the above product information or be obtained from your relationship manager.

Please read those information carefully and contact your client relationship manager if you have any questions.

Client reporting

Investors in Twelve funds will receive monthly or quarterly 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 management company or paying agent (links in product information section).

Communication recording and recordkeeping

The communication methods used by Twelve Capital AG 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 lines used by the trading desk for any relevant conversations are recorded.

Complaints handling and ombudsman services

Ensuring the satisfaction of our clients is our priority. Should we fail to fully meet your expectations, please contact us, so that we can find a way to resolve the issue together.

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 AG, 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:

Matthäus Fischer, Compliance, Twelve Capital AG, Dufourstrasse 101, 8008 Zürich, Switzerland, +41 (0) 44 5508166

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.

If we are still unable to resolve the issue, you can contact a Swiss ombudsman, a neutral and inexpensive or free information and mediation office. Detailed contact information for the relevant ombudsman can be accessed here: <https://www.ofdl.ch/finanzkunden/>

Conflicts of interest

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).

Appropriateness and suitability

Financial Service Providers are affected by the Swiss Financial Services Act if they offer financial services related to financial instruments. The level of investor protection depends on the classification of clients into retail (non-professional), professional or institutional clients. Since Twelve does not render financial services to retail clients, relationships with Twelve clients classified as retail clients will no longer be continued. Twelve will, however, discuss options available with retail clients, including, but not limited to, the possibility to opt up, i.e. to be classified as professional client.

To ensure that you are adequately protected, Twelve must classify you among the categories of professional client or institutional client. The rules of conduct to be applied by Twelve vary according to the classification.

Please be informed that, when providing financial services to professional or institutional clients, the required knowledge, experience and ability to bear loss with regard to the provided financial service are presumed.

When providing transaction-based investment advice, i.e. without consideration of the whole portfolio of the client, Twelve will not carry out an appropriateness or suitability test.

When providing portfolio-based investment advice and asset management, Twelve will verify that no recommendations are given to clients which are not suitable for them. That means all financial services provided resp. financial instruments recommended shall meet the client's investment objectives and sustainability preferences.

For "execution only" transactions without Twelve's advice, neither an appropriateness nor a suitability assessment is conducted. When providing services to professional clients or eligible counterparties, the required knowledge, experience and ability to bear loss with regard to the provided financial service are presumed and no separate appropriateness assessment will be conducted.

Cost information

Costs and fees may be incurred both by Twelve and by third parties (e.g. through third party funds in your portfolio) in connection with the provision of financial services. We distinguish between costs and fees that are charged directly to your account and indirect costs related to holding of financial instruments, e.g. ongoing charges. Information on the actual costs and fees of your portfolio management and/or the financial transactions are disclosed in the respective annual reports.

Inducements

TCAG does not receive inducements from external third parties regarding the services provided.

Document information

This document contains information about Twelve Capital AG and its business practices. Any queries regarding this document and the information contained herein should be directed to the Head of Legal and Compliance, Matthäus Fischer (telephone: +41 (0) 44 5508166, email: matthäus.fischer(at)twelvecapital.com).

Date of last review: 12th of January 2023