

## Twelve Capital (UK) Limited Disclosure Brochure

### Information about us and our regulatory status

**Twelve Capital (UK) Limited** (“TCUK”, “Twelve”, “the firm”, “us”, “we”) is incorporated in the United Kingdom and is an appointed representative of Carne International Financial Services (UK) Limited which is authorised and regulated by the Financial Conduct Authority of the United Kingdom (FRN 823316).

Twelve Capital (UK) Limited 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](http://www.twelvecapital.com).

The firm is licensed to conduct advisory and arranging business in the UK and is obliged to comply with the provisions of the Financial Services and Markets Act 2000 (“FSMA”) (as amended), the Rules and Regulations of the FCA (the “FCA Rules”) together with any generally applicable legislation.

The firm only deals with (elective) professional clients and (elective) eligible counterparties.

### Contact details

You can contact Twelve Capital (UK) Limited by mail, phone or email:

Twelve Capital (UK) Limited  
Moss House, 15-16 Brook’s Mews  
London W1K 4DS, United Kingdom  
info(at)twelvecapital.com  
+44 (0)203 856 67 60

### Business language

Communication with Twelve Capital (UK) Limited will be in English. All documents and information will be provided in English.

## Offered investment universe and product information

The firm provides its marketing and distribution services exclusively for products managed by the Twelve Capital Group (portfolio manager: Twelve Capital AG).

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](http://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 documentations 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 (UK) Limited 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 for any such relevant conversations would be recorded.

## Complaints handling and ombudsman services

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 (UK) Limited, its services, products or employees, please send an email with the details of your complaint to [compliance@twelvecapital.com](mailto:compliance@twelvecapital.com) or contact the local complaints handling function by mail or phone:

Joanna Scott, Compliance, Twelve Capital (UK) Limited, Moss House, 15-16 Brook's Mews, London W1K 4DS Telephone +44 (0)203 856 67 60

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 the FCA:

Financial Ombudsman Service

Address: The Financial Ombudsman Service, Exchange Tower, London E14 9SR

Tel: +44 (0) 800 023 4567 (free for most people ringing from a fixed line in the UK) or +44 (0)300 123 9123 (cheaper for those calling using a mobile) or +44 20 7964 0500 (if calling from abroad)

Email: [complaint.info@financial-ombudsman.org.uk](mailto:complaint.info@financial-ombudsman.org.uk)

Website: [www.financial-ombudsman.org.uk](http://www.financial-ombudsman.org.uk)

## Conflicts of interest

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 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

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.

When providing investment advice to professional clients or eligible counterparties, a suitability statement will not be issued. However, when providing investment advice to professional clients, Twelve will verify that no recommendations are given to clients or prospects which are not suitable for them. That means all financial services provided resp. financial instruments recommended shall meet the client's investment objectives and suitability preferences.

## Cost information

TCUK 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.

## Inducements

TCUK does not receive inducements from external third parties regarding the services provided. TCUK 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 TCUK's only source of income.

## Document information

This document contains information about Twelve Capital (UK) Limited and its business practices. Any queries regarding this document and the information contained herein should be directed to the Compliance Officer Joanna Scott (telephone: +44 (0)203 856 67 60, email: joanna.scott(at)twelvecapital.com).

Date of last review: 1 June 2023