

## Twelve Capital (DE) GmbH Disclosure Brochure

### Information about us and our regulatory status

**Twelve Capital (DE) GmbH** ("TCDE", "Twelve", "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](http://www.bafin.de)) in Germany. Its entry in the BaFin company register can be found [here](#).

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](http://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). It is obliged to comply with the applicable provisions of IFR/IFD, WpIG as well as MiFIR/MiFID and WpHG together with any relevant level 2 regulation or generally applicable legislation.

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/>.

TCDE has the following Legal Identifier Number (LEI): 549300NG90TWBLRVPQ36

### Contact details

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

Twelve Capital (DE) GmbH  
Rosental 5  
80331 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.

## Offered investment universe and product information

The firm provides its investment 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 the fund management company or paying agent (links in product information section).

## 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 lines used for any such relevant conversations 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.

## 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 (DE) GmbH, 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:

Erasmus Faber, Compliance, Twelve Capital (DE) GmbH, Rosental 5, 80331 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](mailto: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](mailto:schlichtungsstelle@bafin.de).

If you are not satisfied how your complaint was handled you may be able to take civil action against us.

## 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

When providing investment 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

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.

## 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.

## Document information

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(at)twelvecapital.com).

Date of last review: 16th January 2024