

Federal Financial Services Act („FinSA“) Disclosures

1. Financial Service Providers:

The following firms of the group of companies acting under the brand Columbia Threadneedle Investment may be considered as “Financial Services Providers” pursuant to FinSA in Switzerland:

- Threadneedle Portfolio Services AG (“TPS AG”), Claridenstraße 41, 8002 Zurich, Switzerland
- Threadneedle Asset Management Limited (“TAML”), Cannon Place, 78 Cannon Street, London, EC4N 6AG, United Kingdom

TPS AG is an unregulated Swiss firm. Distribution staff of TSP AG are registered in the following client adviser register:

BX Swiss AG
Talstrasse 70
CH-8001 Zürich

<https://www.regservices.ch/en/client-advisor-search/>

TAML is regulated by the Financial Conduct Authority (“FCA”) in the UK and authorised as asset manager. The FCA’s address is Financial Conduct Authority, 12 Endeavour Square, London, E20 1JN.

2. Complaints handling and ombudsman office

If you wish to make a complaint about any aspect of the financial service you have received, or to request a copy of our Complaints Handling Procedures, as a first step please contact your Columbia Threadneedle representative free of charge, stating your name, contact details and details about the product, service and entity the complaint refers to.

If, for any reason, you will not receive a satisfactory response, you can contact the relevant ombudsman office:

For TPS AG:

FINOS – Finanombudsstelle Schweiz
Talstraße 20
8001 Zurich
Phone: +44 552 08 00

For TAML:

Financial Services Ombudsman (FOS)
Exchange Tower
London, E14 9SR
Telephone: +44 20 7964 0500

3. Financial Service:

TPS AG engages in fund distribution activities towards professional clients in Switzerland and Liechtenstein.

TAML provides portfolio management services to a range of funds domiciled in Luxembourg and the United Kingdom, available to retail and professional investors. TAML also offers portfolio management services to professional clients.

Please refer to the websites for a description of the available services: [Our Capabilities | Columbia Threadneedle Investments](#)

Detailed information on the rights and obligations as well as costs and fees arising from such services will be detailed in the discretionary portfolio management between Columbia Threadneedle and the clients.

4. Risks associated with the financial service and financial instruments:

For risks associated with fund distribution, please refer to the relevant fund prospectus available on our website: <https://www.columbiathreadneedle.ch/en/intm/our-products/document-centre/>

Risks associated with the financial instruments will be detailed in the Welcoming Letter which is provided to you alongside the discretionary portfolio management agreement entered into between us and yourself.

5. Client segmentation

As financial service client of TPS AG or TAML, you will be classified as either “professional client” or “institutional client”.

Note that the allocation to the client segment will apply to our entire client relationship relating to the provided financial service.

As professional client, you will have the option to opt-out of your segment and be treated as institutional client or to waive the applicability of certain FinSA Code of Conduct rules applicable to Columbia Threadneedle. Alternatively, you have the possibility to opt-in to be categorized as private client.

As institutional client, you will have the option to opt-in to be treated as professional client.

To request any of the above changes, please send an email to switzerland@columbiathreadneedle.com.

6. Conflicts of interest

Information on how Columbia Threadneedle prevents and handles conflicts of interest can be found on our website <https://www.columbiathreadneedle.ch/en/intm/mifid-2/> and the policy is available upon request.

The acceptance of any fee, commission and/or non-monetary benefit (other than a minor non-monetary benefit) is prohibited.

7. Appropriateness and Suitability

TPS AG only engages in fund distribution activities, as such, no appropriateness or suitability assessment is required.

TAML only provides portfolio management services to professional clients and thereby may assume that such clients have the required knowledge and experience and can financially bear the investment risks associated with the financial service.

TAML will carry out a limited suitability test before delivering the portfolio management service, clarifying the client's investment objectives regarding timeframe, purpose, investment restrictions and the client's risk profile. The objective and guidelines agreed will be documented.

8. Best Execution

When handling client orders, Columbia Threadneedle uphold the principles of good faith and equal treatment of investors and aims for the best possible outcome for clients.

Neither TPS AG nor TAML engage in the execution of client orders defined as the acceptance of orders from the client for the subscription of collective investment schemes or other financial instruments or the forwarding of such orders to third parties, and thus the provisions according to art. 17 and 18 of the FinSA are not directly applicable.

Please refer to the website for our Best Execution Policy:

<https://www.columbiathreadneedle.ch/en/intm/our-products/document-centre/>