

**DISCLOSURE NOTICE TO SOUTH AFRICAN CLIENTS IN TERMS OF  
FINANCIAL ADVISORY & INTERMEDIARY SERVICES ACT NO. 37 of 2002 (“FAIS”)**

ISGAM AG herein referred to as “ISGAM” is a licensed **Financial Services Provider, license number 46929**, with the Financial Sector Conduct Authority (“FSCA”), in South Africa. A copy of the license is available upon request.

### **1. Financial Services and Products**

ISGAM is authorised by the FSCA as a Foreign Financial Services Provider to render advice and intermediary services (“financial services”) in respect of the financial product types listed below:

<b>Category Description - CATEGORY I</b>	<b>Non-automated Advice</b>
Participatory interest in a hedge fund	X
Securities and Instruments: Shares	X
Securities and Instruments: Money market instruments	X
Securities and Instruments: Debentures and securitised debt	X
Securities and Instruments: Warrants, certificates, and other instruments	X
Securities and Instruments: Bonds	X
Securities and Instruments: Derivative instruments	X
Participatory interests in Collective Investment Schemes	X

### **2. Authorised Representatives**

ISGAM has duly authorised **Andrew LITTLE** to render financial services as defined in terms of FAIS in respect of all the above mentioned Product Categories. As well as a Representative, Andrew Little is also a Key Individual.

ISGAM has the necessary controls and procedures in place to ensure that Key Individuals and Representatives comply with the prescribed FAIS Fit and Proper Requirements (which includes experience, qualifications, regulatory examinations and honesty and integrity requirements). ISGAM accepts legal responsibility for the rendering of financial services by the said Representatives.

### **3. Contracts with Product Suppliers**

ISGAM have longstanding custody relationships with the following institutions.

Banque Internationale à Luxembourg (Suisse) SA, Credit Suisse (Switzerland) AG and Banque SYZ SA, Credit Suisse (UK) Limited and Canaccord Genuity Wealth Management Limited (CGWM), Charles Schwab & Co. Inc., Canaccord Genuity Wealth Management (International) Limited (CGWIL), Quilter International, Friends Provident International and Utmost Pan-Europe.

ISGAM does not receive any remuneration other than that which is paid directly by the client, this includes from any of the above institutions. Moreover, ISGAM does not hold more than 10% of shares issued by any of the institutions with whom they work or have a relationship.

ISGAM is not restricted in any way to work with a new institution, however for it to be viable there would need to be a minimum of USD 20,000,000 of new assets to be held in safe custody with that company.

Regarding underlying investments, whether direct holdings or via funds, ISGAM offer an open investment architecture that is not biased or restricted in any way.

The custodians physical and postal addresses, as well as the details for their head office, compliance, and complaint departments will be set out in the relevant product supplier's application forms.

#### **4. Remuneration**

ISGAM does not accept any third-party benefits, commissions or retrocessions and shall disclose any remuneration received before the conclusion of any transaction with a Client.

#### **5. Compliance with Financial Advisory and Intermediary Services Act "FAIS"**

Compliance with the FAIS Act is monitored by Masthead (Pty) Ltd, a compliance practice approved by the Financial Sector Conduct Authority. Their postal address is PO Box 765, Howard Place, 7450 and their contact numbers are telephone 021 555 4121, fax 021 686 3589 and e-mail [ctown@masthead.co.za](mailto:ctown@masthead.co.za).

#### **6. Confidentiality**

Where applicable all information will be kept by ISGAM on a confidential basis and will not be made available to third parties unless so authorised by the Client beforehand or if ISGAM AG is required to divulge such information in the public interest or under any law.

#### **7. Conflicts of Interest**

Potential conflicts of interest are inherent in any business. ISGAM will however take the necessary steps to identify and manage conflicts of interests to ensure that clients are not prejudiced. Detecting potential or recognised conflicts of interest constitutes an integral part of the duties and obligations of ISGAM who maintain an active **Conflicts of Interest Management Policy** that is available via [www.isgam.ch](http://www.isgam.ch) or on request by contacting their offices.

#### **Disclosure of Conflicts of Interests:**

ISGAM has no material shareholding in its product suppliers. None of the product suppliers have any shareholding in ISGAM.

#### **8. Complaints**

A copy of the **Complaints Policy & Process** is available upon request. However, should a Client feel that their rights have been prejudiced or aggrieved in any way and want to complain about the financial services provided, then please contact ISGAM at the details on this Disclosure Notice and address the complaint in writing.

If ISGAM did not settle the complaint to the satisfaction of the Client, then the Client is entitled to refer a complaint to the FAIS Ombud. The FAIS Ombud has been created to provide a Client with a redress mechanism for any inappropriate financial services provided to a Client. The FAIS Ombud's contact details are as follows: PO Box 74571, Lynnwood Ridge, 0040, South Africa; or Tel. +27 (21) 470 9080, Fax 012 348 3447, [info@faisombud.co.za](mailto:info@faisombud.co.za) and website [www.faisombud.co.za](http://www.faisombud.co.za)

#### **9. Professional Indemnity, Fidelity Insurance or Guarantees**

ISGAM hold Professional Indemnity / Fidelity Insurance of CHF 2,000,000 underwritten by Liberty Mutual Insurance Group, Luxembourg.

#### **10. Basis of Advice**

For ISGAM to provide you with appropriate advice and financial products, a Client must give sufficient particulars of their financial affairs. Failure to make a full disclosure could result in advice being compromised and may result in a financial commitment to a financial product inappropriate to a Client's needs and objectives.

**11. Financial Intelligence Centre Act no. 38 of 2001 ("FICA") and Anti-money laundering**

ISGAM is an **Accountable Institution** in terms of FICA and registered with the Financial Intelligence Centre ("FIC"). It is therefore obliged to identify and verify clients, to report any cash transactions, terrorist properties and activities and any suspicious & unusual transactions or activities that may facilitate money laundering.

**12. Financial Services Feedback**

ISGAM is committed to good ethical standards and strives to provide services of good quality to clients. Should a Client have any complaints or queries in respect of the Financial Services provided then please do not hesitate to contact us on the numbers provided on this Disclosure Notice.

**Key Individual Endorsement**

I, the undersigned as a duly authorized Key Individual of the FSP, hereby confirm and accept the above terms.

X

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Andrew Little

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**CLIENT ACKNOWLEDGEMENT**

I/We the undersigned hereby acknowledge receipt of this Disclosure Notice from ISGAM AG and have read and understood the terms contained in this Disclosure Notice.

Signed at **South Africa** on the **03/06/2021**

Print Name \_\_\_\_\_

X

\_\_\_\_\_  
Signature

Print Name \_\_\_\_\_

X

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Signature