

# Client Information pursuant to the Financial Services Act (FinSA)

## 1 Informationen about the Company

Based on the legal requirements under Art. 8 et seq. of the Financial Services Act (FinSA), the following provides an overview of Lema Capital Management AG (hereinafter referred to as the “Company”) and the financial services it offers.

Name	Lema Capital Management AG
Address	Gubelstrasse 24, Zug
ZIP / City	6300, Schweiz
Phone	+41 78 330 94 94
E-Mail	leonardo@lemacapitalch.com
Website	www.lemacapitalch.com

The Company was established on 8. August 2025.

## 2 Licensing Status and Supervisory Authorities / Supervisory Organisation

Under the Financial Institutions Act (FinIA), all financial institutions require authorisation from FINMA in order to carry out their commercial activities as asset managers. The financial institution obtained its authorisation on 11 December 2025 and is supervised by the supervisory organisation AOOS – Swiss Supervisory Organisation Ltd. In addition, the financial institution is audited by the audit firm AML Revision AG both for regulatory supervisory purposes and in accordance with the Swiss Code of Obligations.

## 3 Ombudsman

The Company is affiliated with an independent ombudsman’s office recognised by the Swiss Federal Department of Finance. Disputes concerning legal claims between clients and the Company shall, where possible, be resolved through mediation proceedings conducted by the ombudsman’s office. The address of the ombudsman’s office is set out below.

### Ombudsman FINOS

Talstrasse 20  
8001 Zürich  
+41 44 552 08 00  
info@finos.ch  
www.finos.ch

## 4 Business Continuity Management (BCM)

In order to ensure the orderly management of the business at all times and to safeguard business continuity, the Company has entered into a representation and liquidation agreement with an asset manager authorised by FINMA. This agreement ensures that, in the event of dissolution, incapacity of the executive management, or the occurrence of an emergency or liquidation event, the orderly continuation or winding-up of the Company is carried out by a supervised and professionally qualified third party. The address of the institution is set out below.

1.618 Capital AG  
Bahnhofstrasse 30  
6300 Zug  
+41799275549  
<https://www.1618capital.co/>

## **5 Informationen über Finanzinstrumente und Finanzdienstleistungen**

### *5.1 Financial Instrumentes*

Trading in financial instruments involves financial risks that can vary significantly depending on the instrument. For more information, please consult the brochure “Risks Involved in Trading Financial Instruments” published by the Swiss Bankers Association, available at [www.swissbanking.org](http://www.swissbanking.org).

### *5.2 Financial Services*

The Company provides asset management services within the scope of individual mandates pursuant to Article 17 FinIA. Assets are managed in the name and for the account of the client, taking into account the client’s financial situation and investment objectives. Investment decisions are made at the Company’s own discretion.

### *5.3 Suitability and Appropriateness*

When providing financial services, the following approach is applied:

- Asset management: The client’s financial situation, investment objectives, as well as knowledge and experience are assessed in order to ensure the suitability of the service and the investment strategy.
- Professional clients: It is assumed that such clients possess sufficient knowledge and experience and are capable of bearing the investment risks.
- Acting through an authorised representative: The knowledge and experience of the authorised representative are taken into account in the assessment.

If insufficient information is available to carry out the assessment, the client is informed prior to the provision of the service that an assessment is not possible.

### *5.4 Risks*

The following risks should be taken into consideration:

- Capital preservation risk: There is a possibility that financial instruments held in the portfolio may lose value. This risk varies depending on the instrument and is borne entirely by the investor.
- Information risk of the service provider: In the context of asset management services, the service provider takes into account the investor’s financial situation and investment objectives in order to assess suitability. Without sufficient information, a suitability assessment cannot be performed.

- Investment strategy risk: The investor bears the risks associated with the agreed investment strategy. Without complete information regarding the investor's financial situation and objectives, the service provider is unable to provide well-founded advice or perform a suitability assessment.
- Qualified investor risk: As a qualified investor within the meaning of the Collective Investment Schemes Act (CISA), certain financial products may be exempt from regulatory requirements. This may result in risks relating to liquidity, strategy, or transparency.
- Derivative risks: Derivatives (for example options, futures, swaps, or structured products with derivative components) may involve significant risks. These include, in particular, leverage effects, the risk of total loss, counterparty risk, margin call obligations, increased complexity, as well as potential liquidity and valuation risks. The functioning and specific risks of derivative financial instruments are described in detail in the brochure "Risks Involved in Trading Financial Instruments" published by the Swiss Bankers Association, to which explicit reference is made.
- Concentration risks: These may arise if the portfolio is heavily concentrated in individual securities (concentration of 10 per cent or more), issuers (concentration of 20 per cent or more), or sectors. The Company monitors such concentrations as part of its portfolio monitoring and informs clients accordingly where necessary.

#### *5.5 Costs and Third-Party Compensation*

The financial services provided are subject to fees. In connection with these services, compensation from third parties may arise, such as brokerage fees, commissions, rebates, or other monetary or non-monetary benefits. In such cases, the Client is informed of the type, scope, calculation parameters and ranges of such compensation. Upon request, the actual amounts will be disclosed free of charge.

A waiver regarding third-party compensation has been granted, and the Client agrees that such compensation may be retained.

#### *5.6 Use of Clients' Financial Instruments*

The Company does not engage in securities lending or the re-use of clients' securities. Any use of financial instruments for its own purposes or for the purposes of third parties is excluded.

### **6 Dritten Selection of Financial Instruments and Third-Party Relationships**

The Company relies on independent analysis of the financial markets and generally provider-independent selection of financial instruments, including equities, bonds, collective investment schemes, and structured products.

### **7 Dormant Assets**

Client assets may become dormant if contact is lost. To prevent this, the following is recommended:

- Inform the Company immediately of any change in address or name.
- Provide instructions for long-term absences, including options for correspondence redirection or retention.
- Designate a person of trust with power of attorney to act in case of loss of contact.
- Inform trusted persons or include contractual relationships in your will. Further information is available in the brochure “Dormant Assets” published by the Swiss Bankers Association (see: [Nachrichtenlose Vermögen - Informationen für Bankkunden und Unternehmen - Finanzplatz - SwissBanking](#)).

## **8 Conflicts of Interest**

### *8.1 General Information*

Conflicts of interest may arise where financial benefits are obtained at the expense of the Client, where interests of the Company contradict those of the Client, or where incentives exist to favour specific Clients. Examples include:

- Multiple Client orders,
- Conflicts with proprietary or related transactions,
- Transactions by employees.  
To manage these, the Company has implemented internal policies and controls:
- A control function oversees business and staff transactions and compliance with market conduct rules.
- Employees must disclose potential conflict mandates.
- Regular employee training is conducted.
- The control function is involved in conflict resolution and approval processes.

### *8.2 Additional Information*

Further details on potential conflicts of interest and how they are addressed are available on request.

## **9 Legal Notice**

This information is intended solely for Clients. Although it has been carefully prepared, the Company accepts no liability for its accuracy, completeness or up-to-dateness. The applicable contractual terms shall prevail.