

Leucadia Investment Management Ltd

Financial Services Act (FinSA) Information Notice

01.11.2022

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| Introduction | <p>The purpose of this information brochure ("notice") is to inform our client ("you") in accordance with our duty to do so under the Swiss Financial Services Act ("FinSA"). This brochure contains information on Leucadia Investment Management Ltd. ("LIML") the financial services offered and the associated risks as well as on how conflicts of interests are handled.</p> <p>FinSA was adopted by the Swiss Parliament in 2018, and entered into force on 1 January 2020 (subject to certain transitional periods). It introduces a new regulatory framework governing Swiss financial markets and impacts the financial service providers. In accordance with FinSA, LIML makes use of the regulatory transition period of two years to implement FinSA duties regarding the rules of conduct and the organizational measures which became effective as of 1 January 2022.</p> <p>Additional information on the costs and charges for the financial services offered are provided to you separately either under a specific information sheet and/or in the relevant fund documentation, in particular the prospectus/offering memorandum or, where applicable, the relevant term sheet or key investor information available on our website or provided to you directly.</p> <p>The information contained in this brochure can be amended from time to time. The latest updated version of this brochure is available and can be downloaded on our website https://www.jefferies.com/FooterPages/2w/196.</p> |
| Information on LIML | <p>LIML, as part of Jefferies Financial Group Inc., is a UK company acting as distributor of Leucadia Asset Management LLC platform funds.</p> <p>LIML is authorized and regulated by the UK Financial Conduct Authority ("FCA") with its headquarters located at 100 Bishopsgate, London EC2N 4JL, United Kingdom. LIML is subject to the supervision of the FCA whose headquarters are located at 12 Endeavour Square, London E20 1JN: https://www.fca.org.uk/</p> |
| Financial services according to FinSA | <p>FinSA regulates the provision of financial services and financial instruments to clients (as defined in FinSA). For more details on client classification, you may refer to the sections "Client classification" and "Change in client classification" below. FinSA generally applies to financial service providers, client advisors and producers of financial instruments.</p> <p>FinSA defines the following activities carried out for clients as financial services: (a) acquisition or disposal of financial instruments, (b) receipt and transmission of orders in relation to financial instruments, (c) administration of financial instruments (portfolio management), (d) provision of personal recommendations on transactions with the financial instruments (investment advice), and (e) granting of loans to finance transactions with financial instrument.</p> <p>The following are financial instruments that are subject to FinSA: (a) equity securities, (b) debt instruments (securities not classified as equity securities), (c) funds units, (d) structured products, (e) derivatives, (f) deposits whose redemption value or interest is risk or price dependent, excluding those where</p> |

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| | <p>the interest is linked to an interest-rate index, and (g) bonds (unit in an overall loan subject to uniform conditions).</p> |
| <p>Financial services offered by LIML</p> | <p>LIML offers a range of distribution solutions and services to fund managers. The scope of the services we offer may vary in consideration of the client’s domicile and depending on the classification of the client. We offer the following financial service to Swiss clients: acquisition or disposal of funds (fund offering). Such service does not amount to a personal investment recommendation. We do not offer other financial services to clients based in Switzerland.</p> <p>Our services are only provided to institutional and professional clients under FinSA (qualified investors under CISA). LIML does not provide financial services to retail (private) clients. For more details on client classification, you may refer to the sections "Client classification" and "Change in client classification" below.</p> <p>LIML will not verify whether the funds offered to you are suitable or appropriate before proposing you such funds. LIML is not required to document your needs and does not maintain records and other investment management reports or statements for the purposes of offering you units of fund. LIML is subject to conduct rules in its home jurisdiction, which impose duty of loyalty, duty of care, and duty to provide sufficient information on the products offered to investors. Such duties oblige the LIML not to discriminate investors without objective reasons.</p> |
| <p>Client classification</p> | <p>LIML as financial services provider, is required by FinSA to classify its clients into three categories where applicable: retail (private), professional and institutional clients.</p> <p>Based on these classifications, the corresponding level of regulatory protection varies, depending on the client’s knowledge and experience in connection with investment matters:</p> <ul style="list-style-type: none"> - retail (private) clients are granted the highest level of regulatory protection. Retail (private) clients are all clients who do not qualify as professional or institutional clients. The range of financial instruments available is generally limited to products targeted at retail (private) clients or to products explicitly registered for distribution to retail (private) clients. As a rule, LIML does not offer its products to such category of clients; - professional clients are deemed to have the necessary knowledge and experience to invest in all asset classes and to be financially able to bear the investment risks associated with the financial service. Professional clients are sophisticated investors such as occupational pension schemes with professional treasury operations and companies with professional treasury operations. Professional clients have access to a wider investment universe compared to retail clients, which includes financial instruments intended only for professional clients or which are not registered for sale to retail (private) clients; - institutional clients are afforded to the lowest level of regulatory protection. certain professional clients such as regulated financial intermediaries, insurance companies and central banks are deemed institutional clients and are treated as a separate segment of clients. Similar to professional clients, institutional clients have access to a wide range of financial instruments, however they are subject to the least client protection regulations in consideration of their assumed |

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| | <p>knowledge, experience in financial investments and capacity to bear losses. In particular, the rules of conduct set forth in FinSA are not applicable to institutional clients.</p> <p>If you do not agree with the initial classification by LIML you can request a change in your classification as long as you meet the necessary legal requirements and that the requested classification falls within the range of funds offered by LIML (for more details, you may refer to the section "Change in client classification" below).</p> |
| <p>Change in client classification</p> | <p>Clients may declare in writing or in another form demonstrable via text as agreed with LIML that they wish to "opt out" (reduce their regulatory protection) or, alternatively, "opt in" (increase their regulatory protection). The following changes of categories are allowed by FinSA:</p> <p>High net worth retails individuals (HNWIs) and related investment structures</p> <p>HNWIs and private investment structures set up for HNWIs (without professional treasury operation) may declare in writing that they wish to be treated as professional clients ("opting out"/" Elective Professional"), provided that the criteria laid down by the regulations are met:</p> <ul style="list-style-type: none"> - based on education and professional experience or on the basis of comparable experience in the financial sector, the clients possess the necessary knowledge to understand the risks associated with the investments, and - the clients have at their disposal financial assets of at least CHF 500,000; <p>or</p> <ul style="list-style-type: none"> - the clients have at their disposal financial assets of at least CHF 2 million. <p>Eligible "financial assets" include financial investments held directly or indirectly by the client, in particular: (i) sight or time deposits with banks and securities firms, (ii) certificated and uncertificated securities, including collective investment schemes and structured products, (iii) derivatives, (iv) precious metals, (v) life insurance policies with a surrender value, (vi) restitution claims from other assets held in trust specified in cif. (i) to (v) above. Direct investments in real estate and claims from social insurance schemes as well as occupational pension assets do not qualify as financial investments.</p> <p>Professional clients</p> <p>Occupational pension schemes and other institutions whose purpose is to serve occupational pensions with professional treasury operations and companies with professional treasury operations may declare in writing or in another form demonstrable via text as agreed with LIML that they wish to be treated as institutional clients ("opting out") or, on the other hand, all professional clients that are not institutional clients may declare in writing that they wish to be treated as retail (private) clients ("opting in").</p> <p>Institutional clients</p> <p>Institutional clients may declare in writing that they wish to be treated as professional clients ("opting in").</p> <p>Should a client wish to "opt-in" or "opt-out", please reach your contact at LIML or send us an email at edonhoe@jefferies.com .</p> |

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| <p>Conflicts of interests and economic ties to third parties</p> | <p>LIML adheres to the strictest ethical standard and is committed to act in the best interest of its clients. LIML is member of Jefferies Financial Group Inc. and distributes certain funds managed by Leucadia Asset Management LLC (“LAM” also a member of Jefferies Financial Group Inc.) and its affiliated third party managers (“LAM platform funds”). LIML has implemented organizational measures to prevent situations of conflict of interests that could arise between itself (including its employees and its business partners or affiliates) and those of its clients. If unavoidable conflicts of interests should nevertheless arise, you will be informed without delay. The information provided will cover (i) the nature of the conflict, (ii) the underlying reason for it, and (iii) the associated risk to you. You will also receive transparent information on the manner the conflict of interest will be handled. Additional information on that respect may be find in the relevant fund documentation.</p> |
| <p>Distribution fees/ Third party commission</p> | <p>LAM, the fund(s), or their agents may pay commissions as remuneration in respect of the offering of fund(s) in Switzerland. More information is available in the fund documentation.</p> |
| <p>Market offering considered</p> | <p>The market offering considered when selecting the financial instruments offered to the distribution does not include only instrument managed, advised or proposed by us or our affiliates, but also funds managed, advised or proposed by independent third parties.</p> |
| <p>Information on risks</p> | <p>Transactions in financial instruments involve opportunities and risks. It is important that you understand these risks. A description of the major risks associated with such financial instruments used in connection with our financial services can be found in the relevant fund documentation, in particular fund prospectuses/offering memoranda that are provided to you as well as on LAM’s website at the following address https://www.leucadia-am.com/.</p> |
| <p>Mediation body (ombudsman) and client advisers registration</p> | <p>LIML is not affiliated to a mediation body (ombudsman) to the extent it exclusively provides its financial services to professional clients (excluding high net worth retail client and private investment structures set up for such client without treasury operation, which have made an opting-out) and institutional clients.</p> <p>The client advisers of the Promoter providing financial services to Swiss clients are not registered with a client adviser register to the extent that the Promoter is prudentially regulated, and it exclusively provides its financial services to professional clients (excluding high net worth retail client and private investment structures set up for such client without treasury operation, which have made an opting-out) and institutional clients.</p> |

Disclaimer

This notice is solely for informing clients about how Leucadia Investment Management Ltd. ("LIML") implements the applicable statutory requirements on investor protection under the Swiss Financial Services Act. It does not constitute an offer or solicitation by or on behalf of LIML or its affiliate Leucadia Asset Management LLC to utilize a service, buy or sell funds, securities or similar financial instruments or participate in a specific trading strategy in any jurisdiction.