SWISSCOMPLY

SwissComply AG

August, 2026

SwissComply Facts and Figures

SWISSCOMPLY

+250 Clients

SwissComply serves over 250 financial intermediaries with a strong focus on asset and portfolio managers, based in Switzerland.

+150 Funds

SwissComply's clients manage 150 funds (60 UCITS, 10 AIF, 70 Swiss collective investment schemes, 10 others).

Recurring Services

More than 90% of the services provided are recurring, long-term contracts (which are billed quarterly).

+30 Employees

SwissComply boasts more than 30 regulatory professionals proficiently operating across the portfolio manager, product or service desk.

+120bn CHF AuA*

The clients of SwissComply collectively manage over CHF 120 billion in assets.

3 Main Service Areas

SwissComply offers its clients outsourcing services in the areas of (1) compliance, (2) risk management and (3) legal (incl. licence application services).

* Assets under Administration

Eight Good Reasons To Work With Us

SWISSCOMPLY

1 We Are Independent

SwissComply is a wholly independent company. We respect and promote your independence and your ability to make your own decisions.

2 We Understand Your Business

We are familiar with the challenges of the financial industry from our first-hand experience and possess comprehensive knowledge about the intricacies of asset management.

3 We Are Proactive

We proactively and promptly inform you about industry trends and challenges, enabling you to respond optimally to any development.

4 We Have Happy Clients

Our annual client satisfaction survey revealed an exceptionally high rate of satisfaction among our clients.

5 You Save Money

Our needs-based services for asset managers are much more cost-effective than any in-house solution.

6 We Will Take Care Of It

We take full care of your compliance, risk and legal affairs, allowing you to devote your full attention to your clients

7 We Are Your Partner

Our team is committed to being your long-term and reliable partner, assisting you in adding value and achieving competitive advantages.

8 We Are Team of Experts

Comprehensive Expertise Under One Roof: Our diverse Team of specialists saves you time and additional hiring costs.

Reasons for an Outsourcing of Compliance and Risk Management Function

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«Blessing» from FINMA

The regulator explicitly views outsourcing of the compliance and risk management function as a professional implementation variant. SwissComply has not only received the nod from the regulator but has been esteemed enough to be approved as an outsourced compliance and risk management function for more than 200 financial intermediaries. This recognition sets us apart and demonstrates our commitment to maintaining regulatory standards.

Know-How-Pool

Boasting a dynamic team of over 30 professionals, SwissComply harnesses a wealth of experience that enables us to pragmatically and efficiently address and implement new regulations. Each recruitment drive we undertake is geared towards enhancing our expertise, ensuring that we're always at the cutting edge and ready to address emerging challenges in the regulatory landscape.

Proximity to regulatory authorities

Daily interactions with entities such as FINMA, audit firms, and other supervisory bodies aren't just routine tasks for us; they ensure SwissComply is perpetually updated on the shifts and nuances in regulatory guidelines. This close liaison provides us with an edge, allowing us to proactively anticipate changes and adjust strategies for our clients.

Cost efficiency

While maintaining quality, SwissComply champions cost efficiency. Through leveraging economies of scale in various sectors, from directives/internal control systems to training and regulatory monitoring, we're able to extend not just competitive, but highly cost-effective conditions compared to in-house alternatives. Our aim is to ensure your financial resources are channelled effectively without compromising on regulatory compliance.

Streamlining

Our deep-rooted understanding of regulatory standards means we recognize when measures are just right or bordering on excess. With our streamlining capabilities, we can pinpoint and curtail inefficient over-engineering in the regulatory domain, ensuring your operations are streamlined and compliant without unnecessary complexities.

Our Clients

CORE CLIENTS

- Manager of collective assets
- Asset manager
- Trustees
- FinTechs SRO regulated entities

OPPORTUNISTIC

- Banks
- Securities firms
- Fund management companies

SwissComply Business Areas

SWISSCOMPLY

FINMA Licencing

Expertise at Every Stage of the Application

- Application Completion
- Bylaws and Regulations Development
- Business Plan Assistance
- Review and completeness check of the application documents
- Full Engagement with FINMA and Regulatory Bodies

Compliance
(full outsourcing, deputy & support)

- Client on-boarding
- Risk profiling
- Screening incl. sanctions
- FoF controls
- AML function
- Trainings
- Internal organisation incl. directives
- Distribution
- Cross-Border (manuals)
- Reporting duties
- Client due diligence
- Regulatory updates
- Implementation of regulations
- Regulatory audits
- Compliance reporting
- Compliance advisory
- Investment compliance

Risk Management
(full outsourcing, deputy & support)

Operational Risk Management

- Enterprise Risk analysis incl. risk assessment
- Internal control system ICS
- Training
- Regulatory audit support
- Risk reporting

Product Risk Management

- Market/Liquidity/Counterparty/ Concentration Risk Monitoring & Reporting
- Stress scenarios Analysis
- Portfolio Risk Analysis

Investment Controlling

- Investment compliance services
- Set-up and monitoring of investment restriction
- Incident tracking, and breach management

Legal Support

- Licence Application full-support
- Contracts/Agreements
- Due diligence
- Legal Advice
- Marketing legal support
- Escrow Services
- Other legal services

The Outsourcing Agreement will be priced based on service coverage, resulting in a fixed yearly fee paid quarterly.

SwissComply as a partner for an efficient and successful application process

Obtaining a FINMA licence as a manager of collective assets, portfolio manager or trustee poses high regulatory and organisational requirements. SwissComply supports financial institutions throughout the entire licensing process – from the initial analysis to the receipt of the authorisation and beyond.

Thanks to our many years of experience, our close cooperation with supervisory organisations, audit firms and FINMA, as well as our deep specialisation in the asset and wealth management environment, we ensure a structured, pragmatic and efficient approval process.

Our services at a glance

✓ Analysis of eligibility for approval and definition of the project roadmap

✓ Preparation and optimisation of the necessary regulations, directives and governance documents

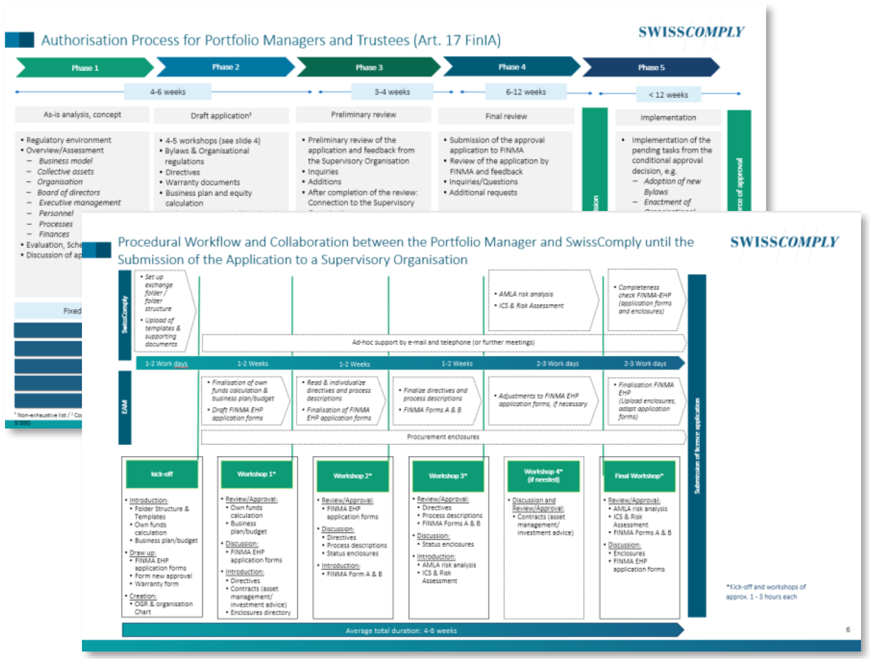
✓ Support in the assessment of guarantors, executive management and board of directors

✓ Preparation and submission of the complete licence application and coordination with audit firms and authorities

✓ Direct support in exchange with the supervisory organisation, audit firm and FINMA

✓ Support in case of queries, additional demands and adjustments during the procedure

✓ Support in the implementation of the new processes, controls and organizational structures



Your added value: experienced. Pragmatic. Efficient.

With SwissComply, you benefit from a well-coordinated team that is not only familiar with regulatory requirements but also implements them in practice on a daily basis. This reduces internal effort, avoids typical pitfalls and increases the likelihood of a smooth and successful approval process.

Customer Journey Map

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DD/Proposal

- Initial consultation covering requirements and client specifics
- Comprehensive due diligence questionnaire
- Proposal including service catalogue, tools, and team details
- Pricing breakdown for setup, compliance, risk management (product and investment), and legal aspects

Contract

- Service Level Agreement (SLA) with client
- Aligned with Article 15 of FinIO
- Comprehensive service catalog
- Designated contacts at SwissComply
- Designated client contact


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Service-Agreement

between

SwissComply AG

and

Calibrium AG

Recurring Services

- Yearly Action Plan: At the core of the team's operations lies the yearly action plan. This plan is meticulously crafted based on the upcoming year's goals and priorities, ensuring it's aligned with all necessary regulatory requirements. The action plan serves as the roadmap for the team, detailing the key tasks, milestones, and objectives to be achieved.
- Use of Technology: The mandate team leverages a range of advanced technologies to streamline their processes and enhance efficiency. These tools and technologies not only provide support in tracking, monitoring, and reporting but also facilitate real-time communication, data analysis, and comprehensive documentation.
- Internal Control System (ICS): Beyond the foundational yearly action plan, the team utilizes a fully automated ICS. This system offers ongoing guidance throughout the year, adapting to regulatory changes to keep the mandate team aligned with current compliance requirements. Through various tasks, reminders, and checkpoints, the ICS ensures that no detail is overlooked, thereby guaranteeing thoroughness in compliance and risk management.

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How we work with our Clients

In an abstract view, **our clients** form the first line of defence while SwissComply acts as the **second line of defence**.

1st line of Defense

Board of Directors
President
Vice-President
Delegates/Members

Executive Board
CEO
CIO
COO/CFO

Relationship Management | Portfolio Management | Operations & Administration

SwissComply reports periodically to the Executive Board and the Board of Directors

2

1

2nd line of Defense: SwissComply

Compliance, Risk Management & AML
SwissComply AG

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SwissComply Core Team
Dedicated head of mandate and a deputy head of mandate

Involvement of SwissComply specialists on specific projects as well as regulatory and legal issues including SEC specific partners

SwissComply acts as a regulatory interface with authorities (e.g. FINMA) and business partners where appropriate.

finma

Regulator / Supervisory Organisation

Audit

Responsability of the 1st line of Defense:

This includes all typical controls already performed by portfolio managers (e.g. investment restrictions) or management (e.g. setting risk policy).

1 2

Communication mainly takes place via email, video call, on-site visits, file exchange and meetings.

Our Holistic Compliance and Risk Management Service Approach

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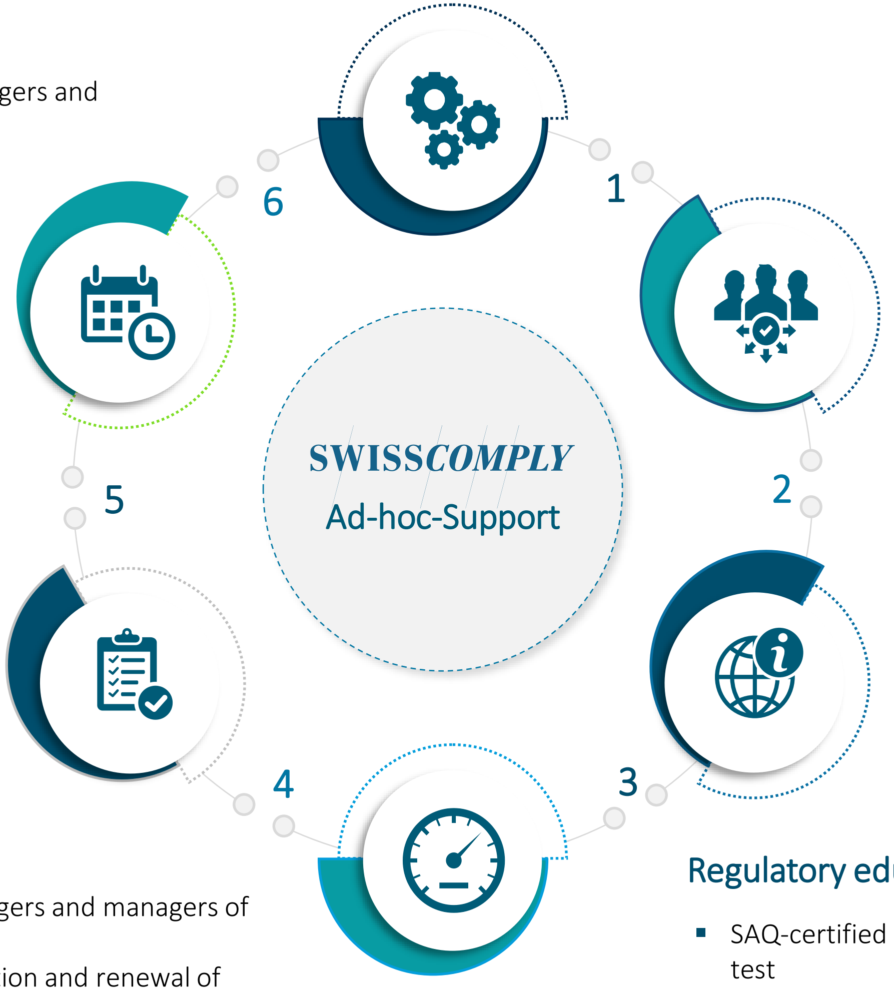
Regulatory Monitoring

- Provision of regular regulatory monitoring for Swiss asset managers and managers of collective assets

Annual risk assessment

- Tailor-made risk analysis of the company (large risk analysis) and other risk assessments (cross-border risks, AML risks etc.)
- Digitally feasible and closely accompanied by SwissComply



Compliance & Reporting

- Support for new customer onboardings incl. LexisNexis checks
- Support with flow of funds controls, investment compliance, etc.
- Support in the implementation of new regulations
- Support in the preparation of adequate compliance and risk management reporting

Governance issues

- Customized instruction set as well as forms, templates, agreements and risk analyses
- Maintenance, adaptation and renewal of written instructions, forms, templates, agreements and risk analyses

Internal Control System (ICS)

- Tailor-made control plans for asset managers and managers of collective assets
- Support / takeover maintenance, adaptation and renewal of the ICS

Regulatory education and training

- SAQ-certified online training courses incl. a multiple-choice test
- Covers all relevant topics
- Recognized by BX Swiss

Technology to make Work easier and better

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SwissComply combines technology with compliance and risk management **services**. Our tools are integral components of our services and are open for (optional) use by SwissComply's clients. All of our tools are user-friendly, do not require on-site installation, and are compatible with all current operating systems and web browsers.

1 Risk & ICS

- ✓ Annual risk analysis and controls along predefined (and expandable) risk dimensions including a comprehensive risk inventory
- ✓ Risk control function with automated e-mail notification and reminder function
- ✓ SwissComply Standard Risk & Control Set with all necessary risk dimensions and controls (constantly adapted to changing regulatory requirements by SwissComply)
- ✓ Dashboard for designated risk managers/managing directors (with statistics and reporting functions)
- ✓ Access via web browser

2 Investment Risk

- ✓ Investment risk management on a product level (e.g. funds)
- ✓ Calculation of market risk analytics, liquidity scenarios (asset & liability), investment stress scenarios
- ✓ Automated Data Integration
- ✓ Covers all requirements of Art. 10 and 14 FinIO-FINMA
- ✓ Investment Restriction Monitoring
- ✓ Access via web browser

3 Screening

- ✓ Name Screening on various regularly updated data sets/lists covering: Politically Exposed Persons (PEPs), sanctions, warnings, law enforcement, government owned companies or their organizations and their officials, international news sources
- ✓ Enables asset managers to identify risks at an early stage and to fulfil AML/terrorist financing duties
- ✓ Access via SC

4 Web Training

- ✓ Web trainings for different regulatory topics (AMLA, Code of Conduct, Advertising and Offering of Financial Instruments, IT & BCM, Cross-Border)
- ✓ Enables asset managers' staff to stay up to date with regulatory issues and developments in an efficient way
- ✓ The Web Based Trainings are recognized by the Swiss Association for Quality (SAQ) as a proof of training within the scope of recertification for the certification "client advisor bank".
- ✓ Access via web browser

5 Cross-border

- ✓ Digital access to up to 150 country manuals
- ✓ Tailor-made cross border queries (e.g. based on domicile, client classification, contract type etc.)
- ✓ Product-Suitability-Checks
- ✓ Tax-Suitability-Checks
- ✓ Information on investment funds and structured products (e.g. term sheets, prospectus etc.)
- ✓ Access via web browser

6 File Exchange

- ✓ Cloud based file access platform
- ✓ Powerful encryption capabilities
- ✓ Complemented by strong password policies
- ✓ Access via web browser

SwissComply Risk Management and Internal Control System

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The SwissComply ICS safe cloud solution supports executive management and the board of directors in their task of analysing, managing and controlling corporate risks in an effective manner. The software follows a three-step risk management process and meets all FinIA requirements for an efficient ICS:

- ✓ Efficient annual risk analysis and controls along predefined (and expandable) risk dimensions including product risk management.
- ✓ Risk control function with automated email notification and reminder
- ✓ SwissComply Standard Risk & Control Set with all necessary risk dimensions and controls, which are constantly adapted to changing regulatory requirements
- ✓ Dashboard for designated risk managers/managing directors (with statistics and reporting functions)

Risk tree according to FINMA audit criteria

E-Mail notifications & reminder including delegation function

Excel and Word reports including audit trail

SwissComply Investment Risk Management

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Regulatory requirements for managers of collective assets (collective investment schemes and/or pension assets)

- The investment manager to measure liquidity and other material risks (i.e. market and credit risk) regularly
- Qualified personnel to perform risk control and act independently
- Risk management must be functionally and hierarchically separated from the profit-oriented business areas

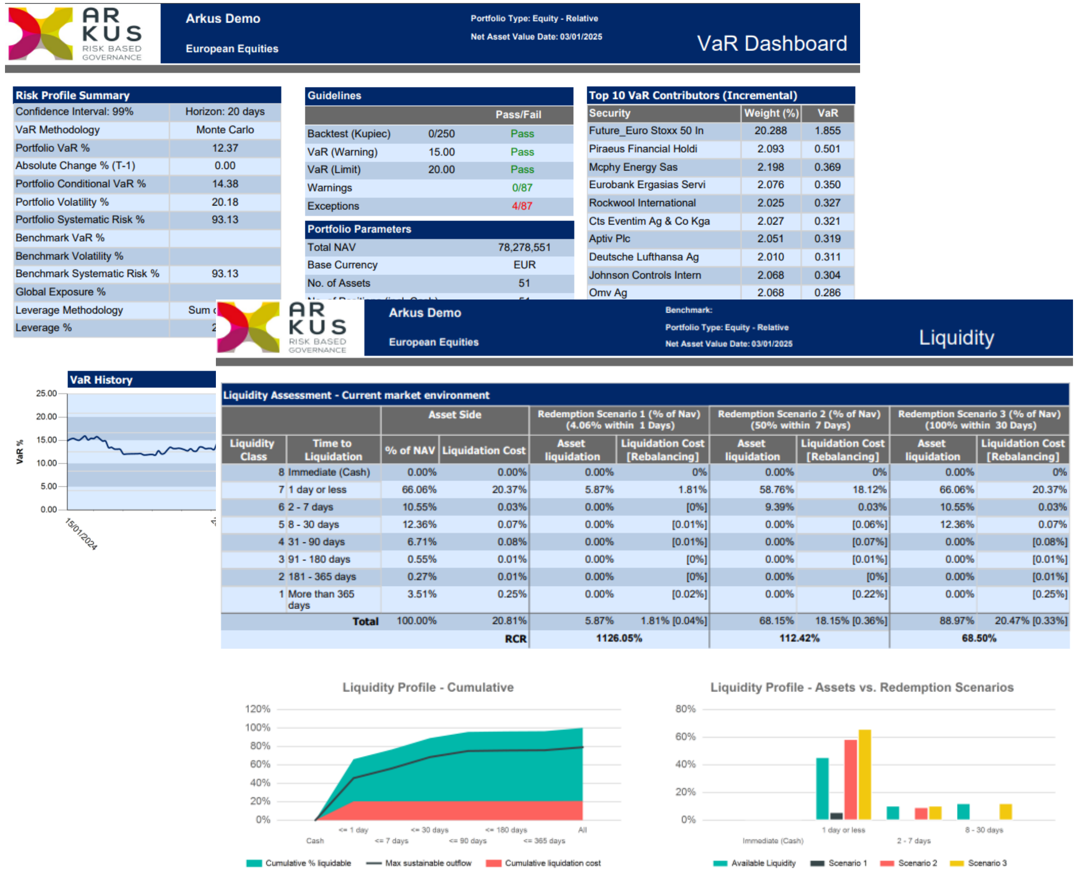
SwissComply Offers Advisory, Monitoring and Reporting

- At regular, individually adapted intervals
- The process and reporting fulfil the FINMA requirements for FINIV-FINMA
- SwissComply acts as an independent, qualified entity
- SwissComply offers a competent assessment and supervision
- Delivery to the Risk Committees and Boards

The Tool: RiskRadar by Arkus

- ✓ Market Risk Analytics
- ✓ Liquidity reporting incl. liquidity scenarios (Asset & Liability side)
- ✓ Investment Stress Test
- ✓ Counterparty Risk and Concentration Reporting
- ✓ Fund Level Exception Risk Reporting
- ✓ Investment Restriction Monitoring
- ✓ Performance Rations & Matrics

RISKRADAR



Risk Profile Summary	
Confidence Interval: 99%	Horizon: 20 days
VaR Methodology	Monte Carlo
Portfolio VaR %	12.37
Absolute Change % (T-1)	0.00
Portfolio Conditional VaR %	14.38
Portfolio Volatility %	20.18
Portfolio Systematic Risk %	93.13
Benchmark VaR %	
Benchmark Volatility %	
Benchmark Systematic Risk %	93.13
Global Exposure %	
Leverage Methodology	Sum
Leverage %	2

Guidelines		Pass/Fail
Backtest (Kupiec)	0/250	Pass
VaR (Warning)	15.00	Pass
VaR (Limit)	20.00	Pass
Warnings		0/87
Exceptions		4/87

Portfolio Parameters	
Total NAV	78,278,551
Base Currency	EUR
No. of Assets	51

Top 10 VaR Contributors (Incremental) Security	Weight (%)	VaR
Future_Euro Stoxx 50 In	20.288	1.855
Piraeus Financial Holdi	2.093	0.501
Mcphy Energy Sas	2.198	0.369
Eurobank Ergasias Servi	2.076	0.350
Rockwool International	2.025	0.327
Cts Eventim Ag & Co Kga	2.027	0.321
Aptiv Plc	2.051	0.319
Deutsche Lufthansa Ag	2.010	0.311
Johnson Controls Intern	2.068	0.304
Omv Ag	2.068	0.286

Liquidity Assessment - Current market environment

		Asset Side		Redemption Scenario 1 (% of Nav) (4.06% within 1 Days)		Redemption Scenario 2 (% of Nav) (50% within 7 Days)		Redemption Scenario 3 (% of Nav) (100% within 30 Days)	
Liquidity Class	Time to Liquidation	% of NAV	Liquidation Cost	Asset liquidation	Liquidation Cost [Rebalancing]	Asset liquidation	Liquidation Cost [Rebalancing]	Asset liquidation	Liquidation Cost [Rebalancing]
8	Immediate (Cash)	0.00%	0.00%	0.00%	0%	0.00%	0%	0.00%	0%
7	1 day or less	66.06%	20.37%	5.87%	1.81%	58.76%	18.12%	66.06%	20.37%
6	2 - 7 days	10.55%	0.03%	0.00%	[0%]	9.39%	0.03%	10.55%	0.03%
5	8 - 30 days	12.36%	0.07%	0.00%	[0.01%]	0.00%	[0.06%]	12.36%	0.07%
4	31 - 90 days	6.71%	0.08%	0.00%	[0.01%]	0.00%	[0.07%]	0.00%	[0.08%]
3	91 - 180 days	0.55%	0.01%	0.00%	[0%]	0.00%	[0.01%]	0.00%	[0.01%]
2	181 - 365 days	0.27%	0.01%	0.00%	[0%]	0.00%	[0%]	0.00%	[0.01%]
1	More than 365 days	3.51%	0.25%	0.00%	[0.02%]	0.00%	[0.22%]	0.00%	[0.25%]
	Total	100.00%	20.81%	5.87%	1.81% [0.04%]	68.15%	18.15% [0.36%]	88.97%	20.47% [0.33%]
			RCR	1126.05%		112.42%		68.50%	

SwissComply Investment Controlling

Can be activated anytime

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Bespoke Investment Compliance – Our Capabilities

Compliance Engine Access via

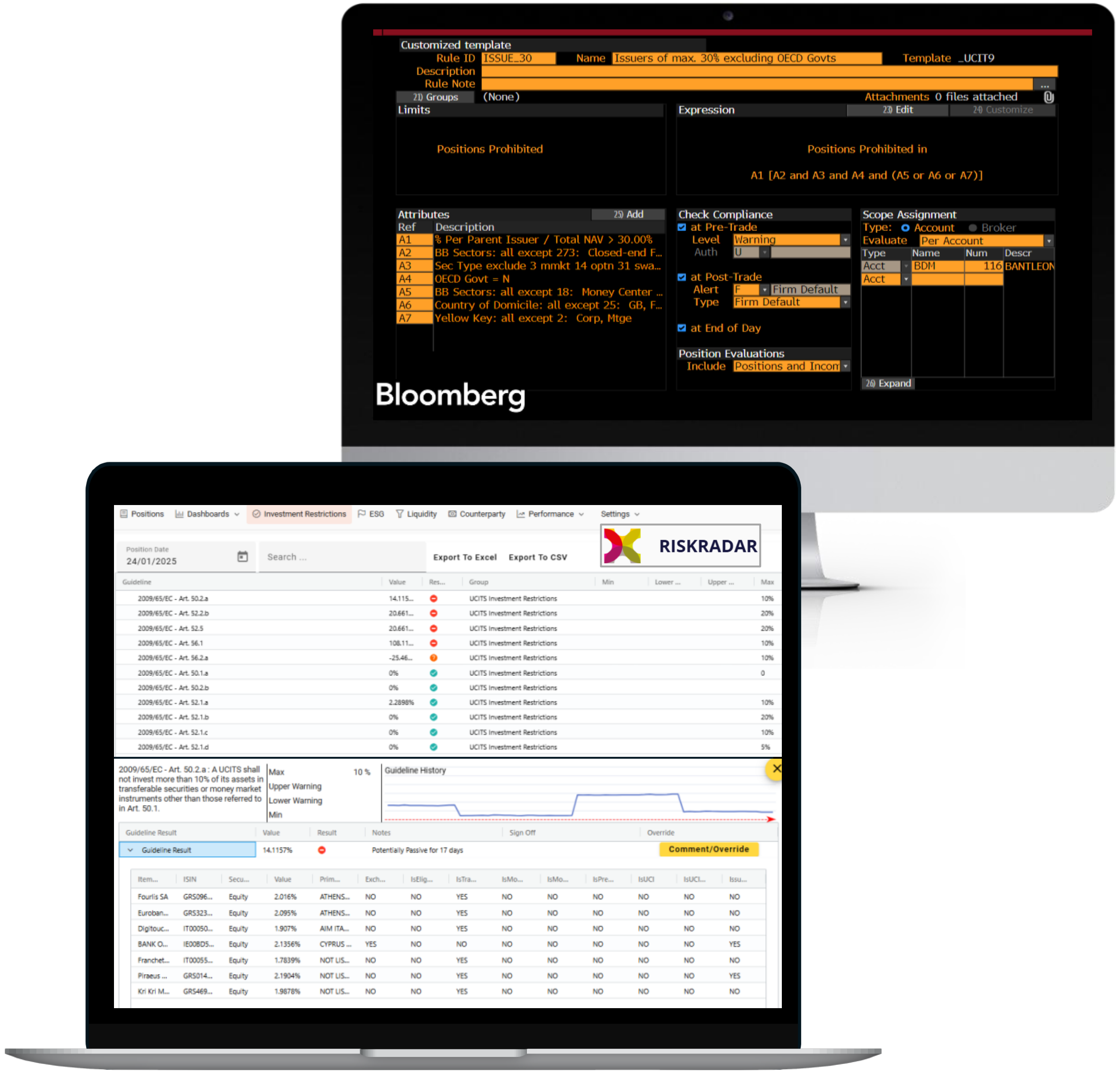
Risk Radar - Investment Restriction Monitoring

Order & Portfolio Management Systems

Other OMS/PM Systems

SwissComply Capabilities

- ✓ Dedicated Compliance Manager and a Deputy
- ✓ Post-trade portfolio compliance monitoring / bespoke pre-trade
- ✓ Mandate rule set-up and maintenance support
- ✓ Post-trade compliance monitoring in line with policies
- ✓ Incident tracking, breach management and resolution
- ✓ Solution-focused approach



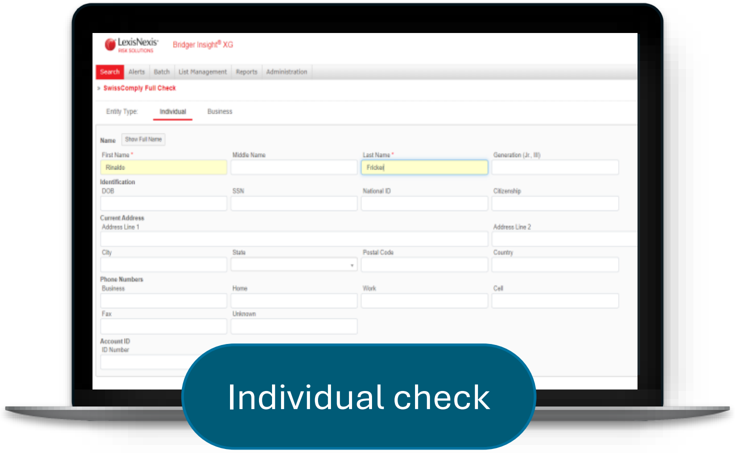
LexisNexis Name and Sanction Screening

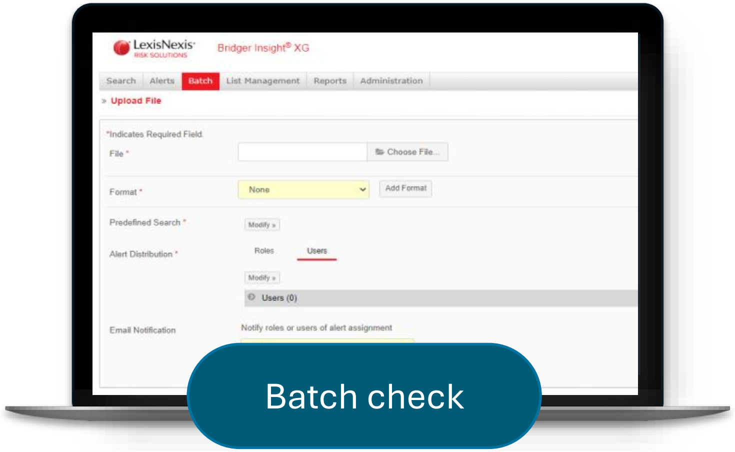
LexisNexis is a web-based Due Diligence Tool that enables early risk identification and helps fulfil legal AML/terrorist financing obligations. SwissComply performs the LexisNexis-checks as a part of client onboardings and also annually and/or ad hoc (e.g. for new sanctions), providing clients with a Screening List Report containing the results.

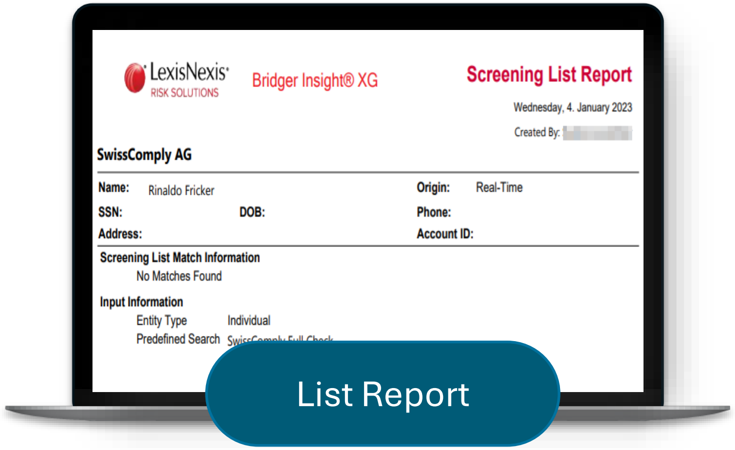
✓ Name Screening on various regularly updated data sets/lists covering:

- Politically Exposed Persons (PEPs);
- Sanctions;
- Warnings;
- Law enforcement;
- Government owned companies or their organizations and their officials;
- International news sources

✓ LexisNexis checks can be performed either as individual checks or as batch checks.







SwissComply Digital Cross-Border Platform*

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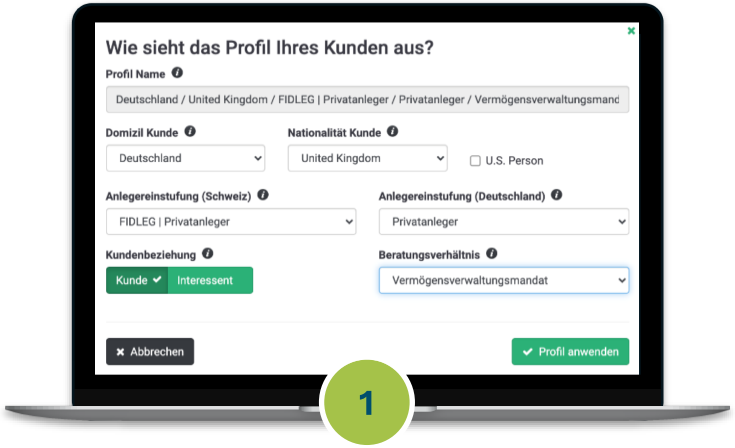
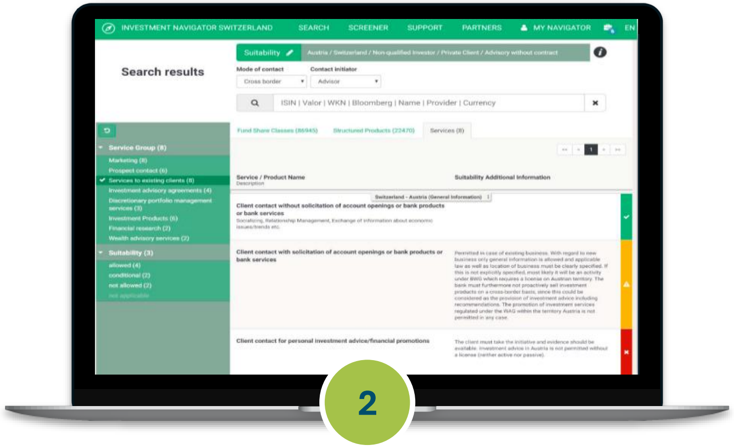
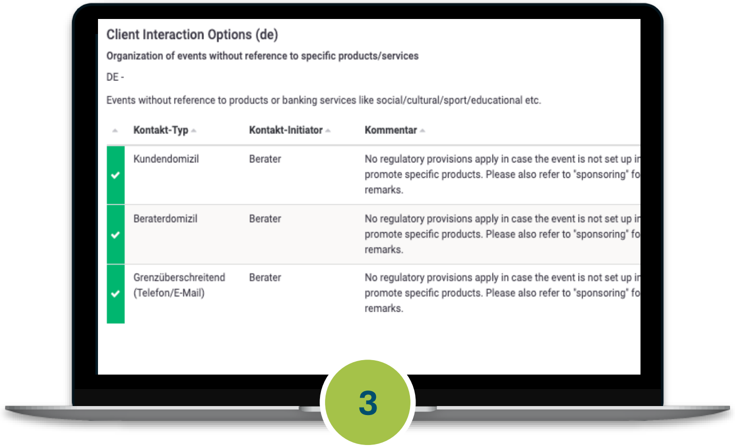
Cross-border business transactions in wealth management are becoming increasingly vital, however the regulatory requirements for such transactions are also continually increasing. Recently, Swiss regulatory authorities have demanded corresponding country manuals for all client domiciles. The SwissComply Cross-Border solution offers up to **150 country manuals**, which are continuously updated and maintained to meet this demand.

- ✓ Digital and available at any time. Cross-border questions can be answered conveniently, quickly and easily.
- ✓ The country manuals can also be downloaded as PDF files.
- ✓ **Suitability information** at ISIN level for investment funds, ETFs and structured products for selected client domiciles.
- ✓ Tax and product-specific information (e.g. basic information sheets).







*Applies for managers of collective assets, portfolio managers, securities firms and fund management companies

SwissComply Academy (1/2) – Web Based Trainings

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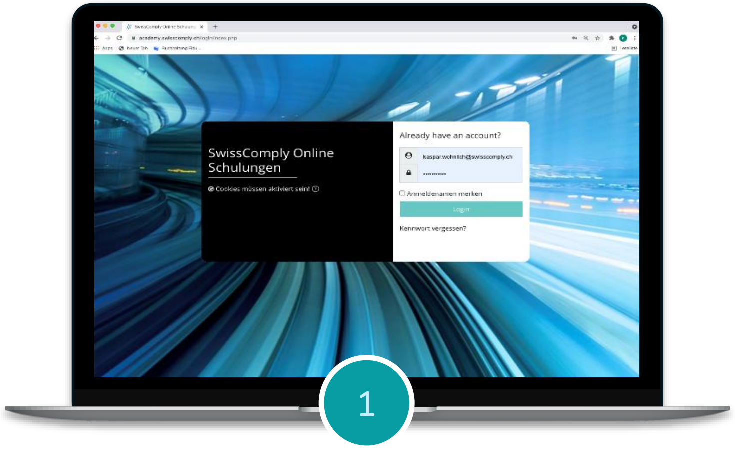
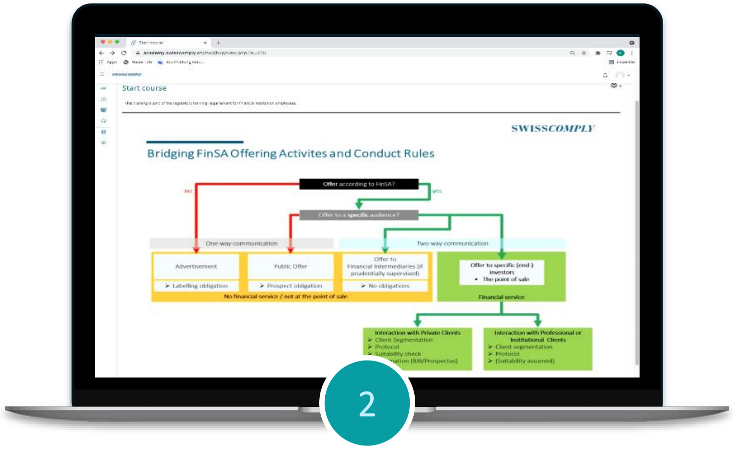
The SwissComply Academy is a regulatory training platform designed for financial intermediaries. Various training modules are available, most of which are SAQ-certified, which cover all relevant training areas. This ensures that all certificates of continuing education required by supervisory law can be covered easily and efficiently.

- ✓ All trainings are available in German and English
- ✓ Recognized by audit companies for fulfilling the regulatory required training obligations
- ✓ The participants hear the speakers and see the slides at the same time (download as PDF is possible)
- ✓ The training courses last about 30 minutes to 2 hours and after completion a multiple-choice test is administered (8-16 questions)
- ✓ Upon successful completion, a certificate will be issued. For SAQ-recognized courses, this also contains its own verification code, which can be presented to the regulatory auditor, for example
- ✓ The SwissComply Academy is easy and intuitive to use





SwissComply Academy (2/2) - The SwissComply training concept at a Glance

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Training module	Content
Online Schulungen durch die SwissComply Academy	With a total of 13 varied online courses, the SwissComply Academy covers all relevant topics – from FinSA basics to IT & BCM or ESG. Flexible, efficient and directly tailored to the practice of financial service providers. Combating Money Laundering and Terrorist Financing (AMLA)** – Course duration: 2hrs IT & BCM** – Course duration: 1 hr FinSA Client Segmentation – Course duration: 1hr Code of Conduct according to FinSA*/** – Course duration: 1hr Data Protection ** – Course duration: 1hr 30min Limited Qualified Investor Fund (L-QIF) – Course duration: 1 hr Crossborder** – Course duration: 1 hr FinIA Asset Managers & Trustees – Course duration: 1 hr ESG (Environment, Social and Governance)** – Course duration: 1hr 30min Advertising and offering of financial instruments */** – Course duration: 2hrs FinIA Managers of collective assets – Course duration: 1hr Trusts Basic Knowledge / Trusts in the Regulatory Environment – Course duration: à 1hr * Recognised by the register of advisors (BX Swiss AG, regservices.ch) as proof of sufficient FinSA knowledge ** Recognised by the Swiss Association for Quality (SAQ) as a recertification measure for the "Client Advisor Bank" certification
Periodic Jour Fixe	Usually monthly exchange between the mandate manager and the asset manager. As part of this exchange, the mandate manager reports on regulatory changes and the planned implementation of new requirements.
Initial & ad hoc training by teams of experts	New regulatory requirements are usually trained by dedicated teams of SwissComply experts at the asset manager. SwissComply's teams of experts are also involved in complex issues. In addition, we take up current topics and prepare them regularly in a live webinar for our customers.

SwissComply Legal Services

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Finance

- Advising financial institutions on FinSA, FinIA and CISA.
- FINMA subordination applications and SRO registrations
- Setting up and structuring investment vehicles (investment funds, investment companies according to CISA, SPV) for traditional and alternative investment areas (private equity, real estate, crypto)
- Preparation of fund prospectuses, investment regulations, PPM and approval by authorities
- Distribution and placement agreements for financial products

Company law

- Incorporations, capital increases, liquidations of companies (AG, GmbH) including notarial work
- Drafting of articles of association, amendments to the articles of association and shareholder agreements
- Preparation and implementation of general meetings and meetings of the Board of Directors (Corporate Secretary)
- Drafting of management and organisational regulations
- Mergers, demergers, transfers of assets under the Merger Act

General legal advice

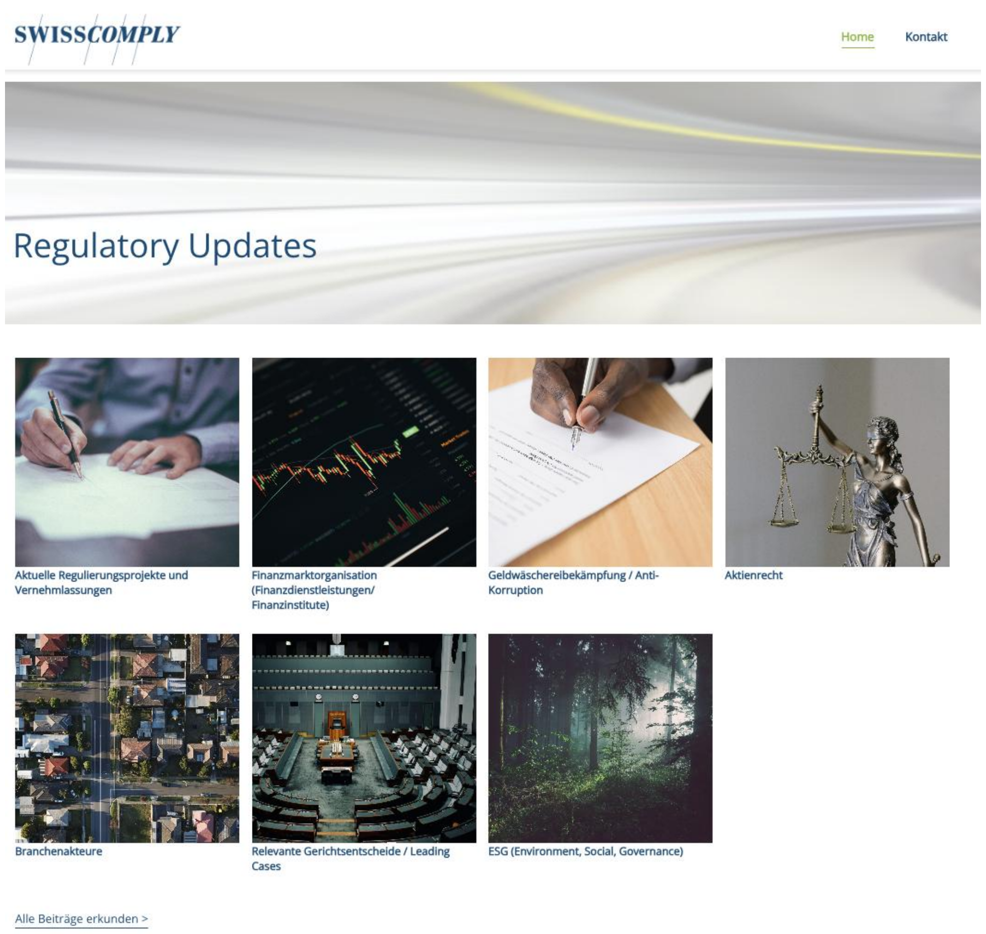
- General contract law (order, employment contract, rent, purchase, etc.)
- Support for company sales and acquisitions (share deal, asset deal)
- Conducting legal due diligence
- Employment law advice from employment to termination
- Examination and registration of trademarks in the trademark register
- Data protection

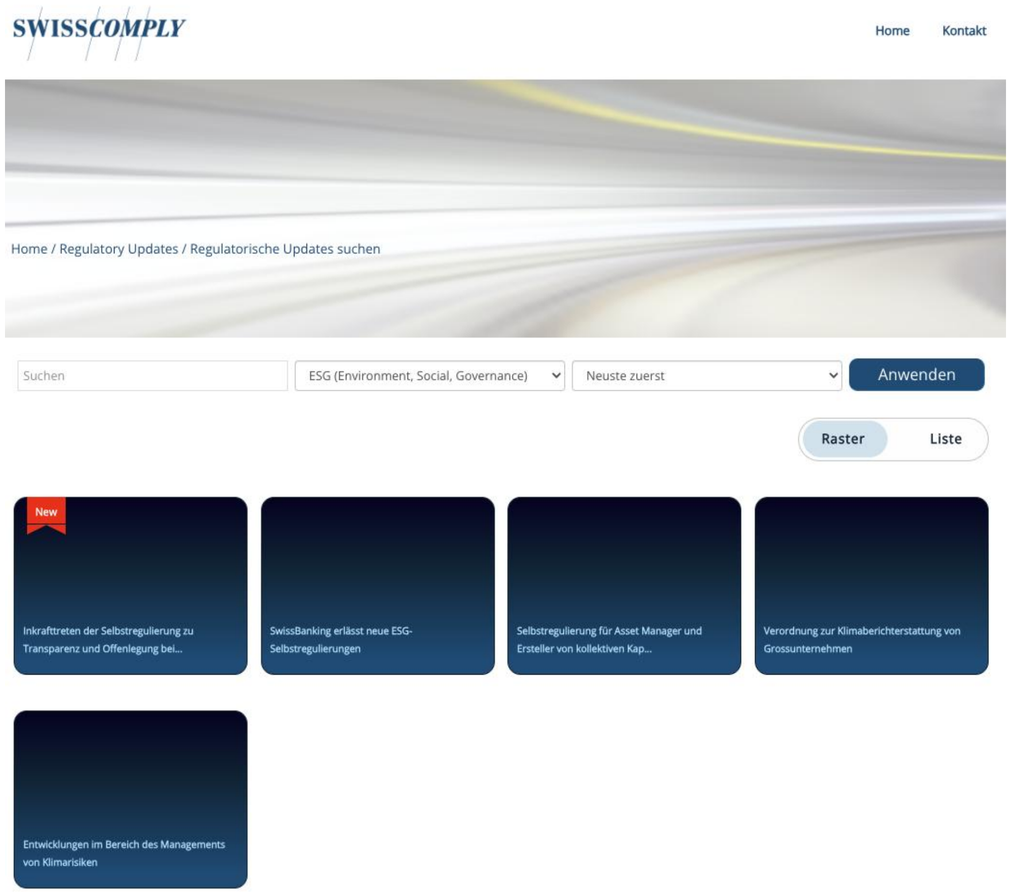
Miscellaneous

- Conducting escrow transactions as an escrow agent in cooperation with banks
- Advice on the settlement of foreign employees or company owners in Switzerland (e.g. requests for work permits, company formations, relocations of registered offices, etc.)
- Family Office Services for Private and Institutional Clients
- Advising startups from foundation to exit

SwissComply's web-based Regulatory Update

SwissComply ensures that all outsourcing mandates are always up-to-date with the latest regulatory requirements. The following figures show extracts of the SwissComply Regulatory Monitoring, which provides early detection of legal and regulatory changes and proactive information. The monitoring report is online available to SwissComply's clients.





SwissComply Expert Commissions – Consultation on Complex Topics (1/2)

SWISSCOMPLY

AML


Gisele Röthlin


Anna Orlova


Wilma Groth


Marco Chinni

FinSA / FinIA


Carolina Hinora


Severin Lehmann


Dr. Michael Huber

Product Risk and Investments


Magdalena Kinal


Alexander Michelberger


Anna Mutzner


Roland Spoetl

Operational Risk and ICT


Anna Mutzner


Alexander Michelberger


Marco Chinni

EU Law & MiFID


Cecilia Homann


Véronique Kadavil


Marco Chinni


Julian Mitterhuber

Products


Dr. Michael Huber


Barbara Attanasio


Magdalena Kinal

SwissComply Expert Commissions – Consultation on Complex Topics (2/2)

SWISSCOMPLY

Trusts & Trustees

Jasmina Gaspar

Magdalena Dornauer

Tamara Pfeffer

Crypto & Blockchain

Jeannette Lehmann

Siegfried Herzog

Andreas Strbad

Veronika Vochtel

Data protection (DSG)

Linda Grahammer

Marco Chinni

Ad-hoc

Marco Chinni

SwissComply – Spectrum of Services (1/3)*

SWISSCOMPLY

General Compliance

Onboarding review of new clients (formal compliance and completeness, up to 20 clients p.a): Identification of contractual parties; determination of WB/KP; KYC (incl. LexisNexis check); material plausibility of AMLA risk profiling; information on source of wealth
Onboarding Suitability Check (up to 20 clients p.a.): Risk profile (risk capacity and risk appetite) and alignment with chosen investment strategy; plausibility check of client segmentation according to FinSA (FIDLEG) and CISA (KAG).
Annual LexisNexis name screening check of all clients relationships
Permanent Sanctions Check
Ad-hoc LexisNexis name screening checks (prospects, counterparties, etc.)
Transaction monitoring Flow of Funds according to ICS 2nd LoD (based on samples as per directive in place)
Internal Anti-Money Laundering Body (Art. 24 and 25 f. AMLO-FINMA)
AMLA monitoring of foreign subsidiaries with Money laundering-relevant activities (Art. 5 & 6 AMLO-FINMA)
Indications of necessary reporting (Art. 9 AMLA and SECO reporting); execution of reports; coordination point with authorities; ensuring asset freezes.
Update of the SwissComply directives set required for regulatory purposes, including adaptation of processes to the legal requirements
Checks of compliance with internal directives in accordance with the ICS
Ongoing monitoring of marketing and offering activities
Checking the documentation of Cross-Border activities
Ensuring compliance with the fiduciary duties, diligence, and information during the onboarding process and on an ongoing basis
Support with EHP submissions for complying with any reporting obligations to FINMA/Supervisory Organisation (changes regarding the institution / changes regarding guarantors)
Supporting employees in relevant compliance issues (usually as part of the 'Jour fixe')
Support the Executive Management or Board of Directors members with the consolidation/preparation of the annual risk assessments
Yearly Compliance Report to the Executive Management and Board of Directors
Due diligence prior to the acquisition of Financial intermediaries and their end clients

*The services outlined represent a selection of possible offerings and are tailored and refined in close collaboration with the client to meet their specific needs.

SwissComply – Spectrum of Services (2/3)*

SWISSCOMPLY

Operational Risk Management

Support the Executive Mgmt. or Board of Directors with the consolidation/preparation of the company-wide risk assessment and other relevant risk analyses

Administration of the ICS; implementation of new controls or fine-tuning of existing controls according to regulatory developments or changes in operations

Supporting employees in relevant risk management issues (usually as part of the 'Jour fixe')

Monitoring regulatory developments and adding/adjusting controls to the ICS if necessary

Carrying out periodic risk management checks in accordance with the ICS

Yearly Risk Management Report to the Executive Management and Board of Directors

Investment Controlling

Test of design (TOD): Control (2nd Line of Defence) of the implementation of guidelines and processes for monitoring limits and restrictions in PMS (annually) and compliance with the investment process in the 1st Line of Defence

Test of effectiveness (TOE): Implementation of 2nd line of defence **post-trade** controls for compliance with investment guidelines - periodicity according to the list below:

- Investment funds under management with predominantly liquid assets (quarterly)
- Investment funds under management with predominantly illiquid assets (for each new NAV calculation)
- Pension assets under management (quarterly)
- Actively managed structured products (AMC) (quarterly)
- Asset management mandates (quarterly samples)
- Portfolio-related investment advisory mandates (quarterly samples)

Quarterly Investment Controlling Reporting to the Executive Board and the Board of Directors (quarterly - part of the Compliance and Risk Reporting)

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SwissComply – Spectrum of Services (3/3)*

SWISSCOMPLY

Investment Risk Management

Risk identification: All relevant risk factors affecting the portfolios are systematically identified

Risk measurement: Market, liquidity and other material risks are quantified using established methods and tools

Risk assessment: The materiality and significance of the identified risks are assessed in the context of the respective investment strategy

Risk management and limitation: Risk-mitigating measures and predefined limits are implemented and monitored

Risk control: Compliance with risk guidelines is ensured through continuous monitoring and exception handling

Reporting and recommendations: quarterly reporting including recommendations for the Executive Board and the Board of Directors

SwissComply's Risk Radar Tool

Interdisciplinary Services

SwissComply Academy - access to periodically updated regulatory training courses for qualified managers and employees (WBT)

Proactive information on changes in the regulatory environment by means of regulatory updates

Support in preparing the audit firm's regulatory audit

Remote participation in the kick-off meeting and the wrap up meeting as part of the regulatory audit

Online Tools

Academy - Software licence, hosting, maintenance, support

SwissComply ICS - Software licence, hosting, maintenance, support

Risk Radar by Arkus - Software licence, hosting, maintenance, support

Country Manuals - Software licence, hosting, maintenance, support

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SwissComply Team (1/2)

SWISSCOMPLY

The SwissComply team consists of legal experts and specialists with many years of experience in asset management, banking and auditing. It consolidates all competencies to provide you with comprehensive and efficient support.

Barbara Attanasio
Director

Stefan Baumann
CEO

Mateo Bilic
Consultant

Christine Brandes
Office Manager

Giuliana Burgener
Office Manager

Marco Chinni
CSSO, Director

Bettina Collart
Partner

Nicole Collomb
Of Counsel

Jasmina Gaspar
Director

Wilma Groth
Director

Laura Haxhosaj
Consultant

Nicla Häfliger
Of Counsel

Carolina Hinora
Senior Manager

Cecilia Homann
Director

Michael Huber
Partner

Véronique Kadavil
Director

Charlotte Kilford
Manager

Anke Krause
Senior Consultant

Magdalena Kinal
Director

Jeannette Lehmann
Senior Manager

SwissComply Team (2/2)

The SwissComply team consists of legal experts and specialists with many years of experience in asset management, banking and auditing. It consolidates all competencies to provide you with comprehensive and efficient support.

Severin Lehmann
Director

Bleona Lufi
Consultant

Alexander Michelberger
Senior Manager

Nikolina Micic
Manager

Anna Mutzner
Senior Manager

Laura Muzzalupo
COO, Partner

Anna Orlova
Senior Manager

Heinz G. Perren
CFO

Roland Spoetl
Director

Andreas Strbad
Senior Consultant

Marco Strässler
Manager

Gisele Röthlin
Director

Helena Roots
Senior Consultant

Kaspar Wohnlich
Delegierter des VR

Christine Zoller
Consultant

SwissComply Speed Pitching Events – CHF +120bn in one room!

SwissComply's client base mainly includes asset managers, collective asset managers, investment firms and small banks. Our clients manage over CHF 120 billion in client assets, and we have developed a platform to regularly host events where our clients can present their innovative products and services to our overall network in an informal atmosphere through a 5-minute pitch.

As an external asset manager, you will have the opportunity to learn about exciting investment opportunities in a brief and concise manner during the speed pitching events. Additionally, there will be opportunities to exchange ideas with other portfolio managers after the events.

The Speed Pitching Events are exclusively for SwissComply customers - **join the club!**

Please let us know if you are interested in pitching your own product.

The next event will take place on

September 17th 2026

Contact

SWISSCOMPLY

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