



Asante Capital Group LLP

Swiss investor disclosure

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1. Introduction

- 1.1. The purpose of this document is to ensure that Asante Capital Group LLP ("**Asante**") is in compliance with the requirements of the Federal Act on Financial Services (950.1; "**FinSA**") and the Ordinance on Financial Services (950.11; "**FinSO**") when distributing interests in various financial instruments to investors based in Switzerland.
- 1.2. Under the provisions of articles 4 to 5 and articles 7 to 20 of FinSA, Asante is required to categorise any Swiss 'clients' that it deals with and is also required to make certain disclosures about it and the financial instruments being distributed.
- 1.3. If you are receiving this document Asante has already categorised you as an institutional professional investor or professional investor and this document contains the necessary information that Asante is required to disclose to you in connection with its distribution activities.
- 1.4. To the extent that you have any questions in connection with the content of this document, please direct these to the Asante contact from which you received it.

2. Disclosure obligations

Under Title 2 of FinSA we are required to disclose the following information to you prior to providing any financial services (as defined in FinSA). Reference to 'investors' in this Part B should be construed as references to 'clients' under FinSA.

2.1. Information about Asante

(a) Name and business address:

Asante Capital Group LLP
25 Old Burlington Street
London
W1S 3AN

+44 (0)20 3696 4700
info@asantecapital.com

(b) Expertise and supervisory status

Asante is a leading, independent global advisory and private markets placement group. Asante is authorised and regulated by the Financial Conduct Authority (the "**FCA**") in the United Kingdom to conduct a range of regulated activities including under the Financial Services and Markets Act and the associated Regulated Activities Orders and also under the Markets in Financial Instruments Directive, as such European law was transposed in the United Kingdom.

Asante's regulatory status can be confirmed on the FCA Register [here](#) (reference number 528366).

(c) Ombudsman

As Asante only deals with non-elective professional clients, it is not affiliated with an Ombudsman in Switzerland.

(d) Risks associated with financial instruments

Asante is generally involved in the distribution of interests in closed ended funds (whether on the primary or secondary market (and from time-to-time interests in associated portfolio entities; together "**Products**")) created by third party Product manufacturers. An investment in a Product is suitable only for sophisticated investors who are aware of the risks of investing in a Product, and a prospective investor must understand, and have the financial ability and willingness to accept the extent of an investor's exposure to the risks and lack of liquidity inherent in an investment in a Product. An investment in a Product should only be considered by investors who are familiar with the specific risk-reward relationship of Products and who have sufficient financial capacity to bear such risks.

A private placement or information memorandum will always be available in connection with any Product that is made available to an investor by Asante and this document will contain a detailed risk section which highlights both the general and specific risks associated with an investment in the specific Product. Investors who are interested in an investment in a Product should read carefully the risk factors set out in the private placement or information memorandum and the associated Product documents, and consult with their own experienced advisers before deciding to invest.

(e) Costs

An investment in a Product will typically include a range of initial and ongoing costs. Investors will be responsible for bearing a proportion of the establishment costs of the Product and will generally also assume responsibility for covering the ongoing costs of administering the Product. A separate management fee will typically be payable to the manager of the Product and in circumstances where a pre-determined investment return has been made for investors, further returns may be split between investors and the Product manufacturer in a pre-set proportion. Full costs disclosures are included in both the private placement or information memorandum and the constitutive document for the Product (for Products structured as limited partnerships, the limited partnership agreement). Costs disclosures on an ongoing basis will generally be included in quarterly reporting in connection with each Product. Further details about costs for any given Product can be made available by Asante on request.

Asante's fees as disclosed in paragraph 3.1(g) below will be in addition to the costs disclosed in this paragraph 3.1(e), but will generally be paid by the Product manufacturer using management fee proceeds.

(f) Investment advice

Asante does not provide investment advice in connection with any Products that it is appointed to distribute. This means that Asante does not make any personal recommendations to any investors in respect of an investment in the relevant Product based on any investor's personal circumstances. No assessment is made by Asante as to whether an investment in a given Product is suitable for any investor based on the consideration of that investor's existing portfolio or circumstances.

(g) Business affiliations

Asante forms part of the Asante Group which consists of four other substantive operating entities as follows:

- (i) Asante Capital Group Advisors, LLC;
- (ii) Asante Capital Group Germany GmbH; and
- (iii) Asante Capital Group HK Limited.

Each of the Asante Group operating entities carries financial services authorisations to conduct capital raising/placement activities in the jurisdictions in which they are incorporated, details of which can be provided on request.

Separately when Asante is distributing interests in a Product, the Product will be manufactured by a customer of the Asante Group. The Product manufacturer will be disclosed in any marketing communications or materials circulated by Asante in connection with the Product. The Product manufacturer (or an affiliate of the same) will be responsible for remunerating Asante for distributing the Product. Asante's fees are typically commission based, calculated by reference to the amount of capital committed to the Product by investors introduced to the Product manufacturer by Asante. In line with the requirements of article 26(1)(a) of FinSA and articles 29 and 26 of FinSO, Asante is treating these fee arrangements as generating a conflict of interest between Asante and any investors that Asante introduces to the manufacturer. In order to manage this conflict, Asante will ensure that all investors are provided with objective information in connection with the Product that will enable each investor to reach an informed decision about the merits of the Product and whether the Product is a suitable investment for any given investor. As a professional client, Asante considers that each investor has a level of sophistication and knowledge which should enable that investor to reach a balanced decision on the merits of an investment in any Product and bear any associated investment risks. Asante will not provide any investment advice to any investor in connection with any Product that it is responsible for distributing. If you have any objections to the fee arrangements disclosed, please contact info@asantecapital.com.

(h) Market offer

Asante represents third party Product manufacturers and does not offer its own Products.

(i) Key information documents

Asante does not make personal recommendations concerning Products to retail clients and as such no key information document will be produced in connection with any Product distributed by Asante.

(j) Private Placement Memorandum

The Products that Asante is engaged to distribute do not fall within the prospectus requirements of articles 35 to 37 of FinSA. Under article 49 of FinSA, where Asante distributes a Product that amounts to a collective investment scheme under article 98 of the Federal Act on Collective Investment Schemes (951.31; "CISA") a prospectus will be produced and made available to all interested investors free of charge. The prospectus will contain the information specified in article 102, paragraph 1 letter h of CISA

(k) Appropriateness and suitability

Asante does not assess the appropriateness and suitability of any Product for any particular investor. As professional clients, Asante is able to assume that all investors that it deals with have the required level of knowledge and expertise to assess each Product and can financial bear the investment risk associated with an investment in the relevant Product.

(l) Client money, assets and orders

Asante does not hold client money or assets. Asante does not handle client orders for investors. Any acquisitions or disposals of, or subscriptions for interests in, a Product, will be handled at Product level.