



GENERAL DOCUMENTATION OF INFORMATION @ 2022.01.01

This document aims at providing the clients of the Company (the “Client(s)”) with the following information:

1. MIM 3 Sàrl. Geneva
2. INFORMATION CONCERNING CLIENT CATEGORISATION
3. COMPLAINT HANDLING
4. FEES AND COMMISSIONS
5. CONFLICTS OF INTEREST POLICY
6. SAFEGUARDING OF THE CLIENT’S FINANCIAL ASSETS

For any question relating to the present document please do not hesitate to contact us

1. MIM 3 Sàrl, Geneva, OUR COMPANY

1.1. The Company: The Company MIM 3 Sàrl (“MIM3”) is a limited company (Sàrl) subject to Swiss law, registered with the Swiss Trade and Companies Register under the number CHE-432.320.184. It has its registered office at 4, Boulevard de la Tour, 1205 Geneva, Switzerland.

1.2. Activities: The Company is active in Trading and Private Equity. The company is compliant with LBA-rules in Switzerland through ARIF, Geneva. The Company also provides the ancillary services of asset management (limited turn-over), advice to undertakings on capital structure, industrial strategy and related matters, and advice and services relating to mergers, and the purchase of undertakings.

2. INFORMATION CONCERNING THE CLIENT CATEGORISATION

In accordance with the Law and the Regulation, the Company classifies its Clients in two main categories: Private Clients and Professional Clients. An additional category (Eligible Counterparty) is provided for by the applicable Law and Regulations however only applies to a certain category of Clients and a limited number of activities. Different levels of protection apply to each category.

3. COMPLAINT HANDLING

The aim of the Company is to provide an efficient service to all its Clients. Therefore, the Company has set up a procedure for its Clients who feel dissatisfied about the services they receive. The Client has a right to complain and to have his/her query investigated. The main principles of the aforementioned policy can be summarised as follows: The first step for the Client is to raise the complaint by telephone or Email with his/her regular MIM3’s contact (Sales or Back Office - if the matter cannot be addressed by the employee directly, the relevant head of department will become involved). If the Client is not satisfied with how the complaint has been handled, he may -as a second step- write directly to the Management of the Company who in turn will investigate the matter and will further process the Client’s complaint. Written complaints shall only be sent - by postal mail at the Company’s address being MIM 3 Sàrl Att. of the Executive Management or the Compliance Officer at 4, Boulevard de la Tour – 1205 Geneva, Switzerland or - by Email at admin@mim3.ch . Complaints must clearly indicate the full Client’s details and include a brief description of the reason for the complaint. For simple cases, the Client will receive a written response within 10 working days. For more complex cases, the complaint will be investigated by the Compliance Officer in cooperation with the respective department and a



response will be sent within 20 working days. In consideration of particular circumstances or particular difficulties of the Company, the handling of a complaint may exceptionally exceed a period of 30 working days. The Client will be informed thereof in due time. The client will receive a notice within 10 working days of this special handling case.

4. FEES AND COMMISSIONS

Fees and Commissions applicable to the bank account of the Client or provided in the product/trade/transaction.

5. CONFLICTS OF INTEREST POLICY

The Company and its Clients are commercial partners having each their own particular interests. In such a context, conflicts of interest between the different parties may arise. In order to safeguard the interests of its Clients, the Company has adopted a conflicts of interest policy (the “Conflicts of Interest Policy”) setting out criteria for identifying and procedures and measures for managing conflicts of interest entailing a material risk of damage to the interests of one or more Clients which could arise - in the context of the provision of investment and ancillary services - between the Company or its shareholders and employees and its Clients on the one hand and between its different Clients on the other hand. Under the Conflicts of Interest Policy, the Company shall identify the circumstances which constitute or may give rise to a conflict of interest insofar as such conflict entails a material risk of damage to the interests of one or more Clients (“Conflict of Interest”). The Company has in place various procedures and measures in order to actively manage Conflicts of Interest it has identified and to ensure, with reasonable confidence, that risks of damage to Client interests will be prevented: 5.1.

Organisational arrangements The Company has adopted the following organisational measures: • Remuneration policies preventing any kind of profit-sharing directly linked to the success of a specific transaction and any other kind of direct link between the remuneration of relevant persons principally engaged in one activity and the remuneration of, or revenues generated by, different relevant persons principally engaged in another activity, where a Conflict of Interest may arise in relation to those activities; • Joint signature requirements according to internal procedures in order to prevent/limit the possible exercise of improper influence/abuses in relation to the way in which a relevant person carries out investment or ancillary services or activities. A temporary deviation from these principles is only allowed in exceptional circumstances. Every such deviation must be justified and is meticulously supervised by the Compliance Officer. 5.2. Information barriers Certain services are particularly exposed to Conflicts of Interest, should information be transmitted from one operational entity to another. The Company therefore maintains “Chinese walls” in order to prevent and control the circulation of confidential information between departments or persons who are exposed to Conflicts of Interest within the framework of their activities, if such circulation of information could harm the interests of one or more Clients. The following specific measures are in place: • Physical information barriers: systems controlling access to certain areas, access limitations for visitors, conservation of documents in protected locations with restricted access; • Electronic information barriers: special electronic security systems, mandatory passwords for obtaining access to the IT system of the Company in general or to certain information; • Control of any simultaneous or sequential involvement of relevant persons in separate investment or ancillary services or activities where such involvement may imply an undue circulation of confidential information or otherwise impair the proper management of Conflicts of Interest. A temporary deviation from these principles is only allowed in exceptional circumstances. Every such deviation must be justified and is meticulously supervised by the Executive Management, the Board of Directors and the Compliance Officer.

Education and training procedures have been adopted aimed at adequately and regularly informing the Company’s staff and more generally all relevant persons on the specific measures adopted under the Conflicts of Interest Policy, on the legal, financial and reputational risks for the Company in case of Conflicts of Interest as well as on the personal sanctions such persons may incur in relation thereto.



There is a formal prohibition to accept advantages beyond a threshold value of EUR 100 unless a specific authorisation has been given (no authorisation shall be given beyond a threshold of EUR 300). In addition hereto, any relevant person must contact the Executive Management, the Board of Directors or the Compliance Officer in case of doubt as to the appropriate behaviour to adopt in relation to Conflicts of Interest and any other related question.

6. SAFEGUARDING OF THE CLIENT'S FINANCIAL ASSETS

The Client should bear in mind that, in the event of the insolvency of the depository bank or a subcustodian of the depository bank, he might meet some difficulties to obtain the restitution of its assets or financial instruments.