

**Client Relationship Summary (Form CRS/ADV Part 3)**

March 26, 2024

**ITEM 1: INTRODUCTION**

**FinaPort Asset Management AG** ("FinaPort") is registered with the U.S. Securities and Exchange Commission as Investment Adviser, CRD 286220, and is a member of the AOOS, a Swiss supervisory organization.

Investment advisory and brokerage services and fees differ and it is important for investors to understand the differences. Free and simple tools are available to research firms and financial professionals at <https://www.investor.gov/CRS>, which also provides educational materials about investment advisers, broker-dealers and investing.

**ITEM 2: RELATIONSHIPS AND SERVICES*****What investment services and advice can you provide me?***

FinaPort provides investment advisory services to high-net-worth individuals and companies, including asset management services. We offer two types of mandates for asset management services. A discretionary mandate allows us to determine the type and amount of securities to be bought or sold in your account without asking or notifying you in advance. A non-discretionary mandate requires your confirmation prior to any trades in your account being placed, with our investment discretion being limited to an advisory role.

We do not primarily recommend one type of security to clients. Instead, we recommend investment portfolios designed to be suitable for each client relative to that client's specific circumstances and needs. However, we are limited in investment selection in that we can only invest your account in securities which are available on your custodian/broker-dealer's platform. When providing you services, we do not recommend or offer advice on any proprietary products. There are no minimum investment amounts or conditions required for establishing an account managed by us.

Our relationship managers monitor your investments regularly, but at least quarterly as part of our standard services. We will contact you at least annually to discuss your portfolio.

*More detailed information about our services is available in our Form ADV, Part 2A Brochure (Items 4, 7, 13 and 16) at <https://adviserinfo.sec.gov>.*

*Conversation Starters: Ask your financial professional: Given my financial situation, should I choose an investment advisory service? Why or why not? How will you choose investments to recommend to me? What is your relevant experience, including your licenses, education and other qualifications? What do these qualifications mean?*

**ITEM 3: FEES, COSTS, CONFLICTS AND STANDARD OF CONDUCT*****What fees will I pay?***

Our asset management fee is generally charged as percentage of the market value of assets under management ("AUM") or assets under advisement ("AUA"). The fee is charged quarterly either in arrears or advance. The AUM/AUA are based on the net asset value of the portfolio on the last day of each prior fiscal quarter and are charged in the reference currency of the account or equivalent in Swiss Francs. The annual asset management fee ranges from 0.80% to 1.25% of AUM/AUA, though Qualified Investors can instead opt for a performance-based fee of 10% of the annual return plus an asset management fee of 0.60% to 1.05% of AUM/AUA. This performance fee is calculated on the difference between the AUM at the beginning of the year (or if a new account, when it is established) and the end of the year, adjusted for inflows/outflows.

Because our fee is based on the account value, we have an incentive to recommend that you increase the level of assets in your account. Clients paying a performance-based fee should be aware that investment advisors have an incentive to invest in riskier investments when paid a performance-based fee due to the higher risk/higher reward attributes. Our fees do not include custodian fees, fees for trade settlement, brokerage commissions, or taxes, nor management fees or other fees charged by funds and other transactional fees and product-level fees.

*You will pay fees and costs whether you make or lose money on your investments. Fees and costs will reduce any amount of money you make on your investments over time. Please make sure you understand what fees and costs you are paying.*

More detailed information about our fees is available in our Form ADV, Part 2A Brochure (Items 5& 6) at <https://adviserinfo.sec.gov>

**Conversation Starters:** Ask your financial professional: Help me understand how these fees and costs might affect my investments. If I give you \$10,000 to invest, how much will go to fees and costs, and how much will be invested for me?

**What are your legal obligations to me when acting as my investment adviser? How else does your firm make money and what conflicts of interest do you have?**

When we act as your investment adviser, we must act in your best interest and not put our interest ahead of yours. At the same time, the way we make money creates some conflicts with your interests. You should understand and ask us about these conflicts because they can affect the investment advice we provide you. Here are some examples to help you understand what this means.

Because our fees are based on the value of your account, we have an incentive to recommend that you increase the level of assets in your account. We manage accounts billed on performance-based fees as well as accounts that are not billed on performance-based fees. Managing both kinds of accounts at the same time can create a conflict of interest, because we may have an incentive to favor accounts for which we receive a performance-based fee and an according incentive to invest in riskier investments due to the higher risk/higher reward attributes.

When providing asset management services, we will suggest that you establish an account with a licensed bank or Broker - dealer. FinaPort Asset Management has contractual relationships with a selection of institutions such as Bank Vontobel AG, Bank Julius Baer, EFG and Creand to maintain custody of your assets and effect trades for your account. Our selection of financial institutions is not based solely on your interest of receiving the best execution possible, but also because they provide us with research, products and tools that help us manage and develop our business, for which we do not pay.

We actively manage our own personal accounts while managing your and other client accounts. This creates different conflicts of interest for which we have developed procedures for mitigation and control.

More detailed information about our legal obligation is available in our Form ADV Part 2A Brochure (Item 6 "side-by-side management", item 10 and 11. at <https://adviserinfo.sec.gov>

**Conversation Starters:** Ask your financial professional: How might your conflicts of interest affect me, and how will you address them?

**How do your financial professionals make money?**

We compensate our investment adviser representatives based on the level of assets that the representative brings into us. This creates a conflict of interest as it gives your representative an incentive to recommend you invest more in your account with us due to the potential for increased payments.

#### ITEM 4: DISCIPLINARY HISTORY

**Do you or your financial professionals have legal or disciplinary history?**

Yes. Visit <https://www.investor.gov/CRS> for free and simple search tools to research us and our financial professionals.

**Conversation Starters:** Ask your financial professional: As a financial professional, do you have any disciplinary history? For what type of conduct?

#### ITEM 5: ADDITIONAL INFORMATION

**Where can I obtain additional information?**

Call +41 44 213 1562 to obtain up-to-date information or visit the Investment Adviser Public Disclosure under <https://adviserinfo.sec.gov/>.

**Conversation Starters:** Ask your financial professional: Who is my primary contact person? Is he or she a representative of an investment adviser or a broker-dealer? Who can I talk to if I have concerns about how this person is treating me?