

## **Brochure Supplement – Part 2B of Form ADV**

**Pictet Asset Management Inc.**

**3100-1000, de la Gauchetière West**

**Montreal, Quebec**

**Canada, H3B 4W5**

**Date of the brochure supplement:**

**March 29, 2019**

**This Brochure Supplement provides information about Pictet Asset Management Inc. (PAMI) that supplements the PAMI's brochure. You should have received a copy of that brochure. Please contact Compliance Department at +1 514 288 8161 or by email [mtl\\_compliance@pictet.com](mailto:mtl_compliance@pictet.com), if you did not receive PAMI's brochure or if you have any questions about the contents of this supplement.**

**Additional information about Pictet Asset Management Inc. is available on the SEC's website at [www.adviserinfo.sec.gov](http://www.adviserinfo.sec.gov).**

The information about the named supervised persons, set forth below, supplements the Pictet Asset Management Inc (“PAMI” , “we” or “us”) brochure.

“Supervised persons” within PAMI covered by this brochure supplement are identified as persons who are Directors of PAMI.

We provide below the following information about each supervised person:

“Educational background” refers to the supervised person’s post-high school education.

“Present position” and “previous position” refers to the supervised person’s experience for the last five years.

“Disciplinary information” refers to legal or disciplinary events that are material to your evaluation of the supervised person, such as civil lawsuits, proceedings before a government or self-regulatory agency relating to investment activity, or criminal proceedings.

“Other business activities” refers to whether the supervised person is actively engaged in any investment-related business or occupation other than his or her employment by PAMI.

“Additional compensation” refers to whether the supervised person receives an economic benefit for providing investment advice other than his or her regular remuneration from PAMI

## **Niall Michael Quinn**

### ***Item 1 – Business address and telephone if they differ from those on the cover page***

Pictet Asset Management Limited, Moor House, 120 London Wall, London EC2Y 5ET, +44 20 7847 5136

### ***Item 2 - Educational background and experience:***

Born 1971

Education: Trinity College, University of Dublin (BA Economics and Philosophy).

Present Position: Head of Institutional since 2016. Previously: Managing Director and Chief Executive Officer at Eaton Vance Management (International) Ltd (2009 to 2016). Head of Business Development for Gatmore Investment Management Ltd (2006-2008).

### ***Item 3 - Disciplinary information:***

None

### ***Item 4 - Other business activities:***

Member of Pictet Asset Management Executive Committee since 2016.

### ***Item 5 - Additional compensation:***

The supervised person does not receive an economic benefit for providing investment advice as per the above definition.

### ***Item 6 - Supervision:***

Supervised by Laurent Ramsey, CEO of PAML, Telephone +41 58 323 3333.

**John Maratta*****Item 2 - Educational background and experience:***

Born: 1961

Education: Bachelor in Industrial Relations and Economics from McGill University, Montreal, Quebec, Canada.

Present Position: Head of Institutional-North America and Director of PAMI.

He has been an Officer of PAMI since 2007 and a Director of PAMI since 2012.

***Item 3 - Disciplinary information:***

None.

***Item 4 - Other business activities:***

None.

***Item 5 - Additional compensation:***

The supervised person does not receive an economic benefit for providing investment advice as per the above definition.

***Item 6 - Supervision:***

Supervised by Niall Quinn, Head of Institutional, Pictet Asset Management Limited, Telephone +44 20 7847 5136.

**Maria Zavitsanos*****Item 2 - Educational background and experience:***

Born 1964

Education: Diploma in Public Accountancy from McGill University, Montreal, Québec, Canada and Chartered Accountant of the Order of Chartered Professional Accountants of Quebec

Present Position: Senior Vice President and director of PAMI since 2007.

***Item 3 - Disciplinary information:***

None.

***Item 4 - Other business activities:***

Maria Zavitsanos is also an Officer and member of the board of other entities: Pictet Canada L.P. and Pictet Overseas Inc.

***Item 5 - Additional compensation:***

The supervised person does not receive an economic benefit for providing investment advice as per the above definition.

### ***Item 6 - Supervision:***

Supervised by Eric Hamid, Chief Executive Officer of Pictet Canada L.P. and Pictet Overseas Inc., telephone +1 514 288 8161.

### **Compliance**

Compliance activities of PAMI are supervised by PAMI's own compliance department. Close collaboration further exists with PAM Affiliates' own compliance departments to ensure that a common standard is applied and reflects common values shared by PAMI and PAM Affiliates. As a result, PAMI, PAMSA and PAML are all subject to the same Code of Ethics.

There is also an extensive compliance monitoring programme deployed by the PAM Affiliates to ensure that the activities carried out by related entities such as PAMI are carried out in compliance with all relevant rules and regulations with the goal to achieve a common view and synchronicity in the compliance standards deployed and application of rules and regulations, as PAMI, PAML and PAMSA are all at least regulated by one common regulatory regime, i.e. the Investment Adviser Act of 1940 under the regulatory oversight of the SEC.

### **Code of Ethics**

Pursuant to Rule 204A-1 of the Advisers Act, PAMI has adopted a Code of Ethics to establish applicable policies, procedures and guidelines that promote ethical practices and conduct by all of its personnel and to prevent violations of the Advisers Act. PAMI has adopted a written Code of Ethics that applies to all its employees and certain related persons. The Code of Ethics is administered by our Chief Compliance Officer and its compliance peers, in coordination with other PAM Affiliates compliance departments.

PAMI personnel must observe the applicable standards of care set forth in the Code of Ethics and may not seek to evade the policies and procedures set forth therein in any way, including through indirect acts by family members or other associates. The obligations set forth in the Code of Ethics are in addition to, and not in lieu of, the policies and procedures set forth in our Compliance Supervisory Procedures Manual and any other policies and procedures we adopt in respect of the conduct of our business. Our personnel must certify at least annually that they have read, understand, are subject to, and have complied with our Code of Ethics and our Compliance Supervisory Procedures Manual. Our personnel must comply with applicable federal securities laws and must report any improper or suspicious activity, including any suspected violations of our Code of Ethics and Compliance Supervisory Procedures Manual to the CCO.

## **We Take Important Steps to Help Safeguard the Information We Collect About Our clients**

PAMI is committed to safeguarding our clients' personal information. This notice describes the personal information we collect regarding an individual's current or former relationships with PAMI and how we handle and protect it. As part of our normal business practices, we distribute our Privacy Notice annually or when significant changes are made to it.

### **Why and How We Collect Personal Information?**

We collect personal information to enable us to provide products and services to our Clients and in order to conduct our business. For example, we collect personal information to:

- Help us evaluate the needs of Clients and comply with our regulatory obligations;
- Provide Clients with an effective and efficient service.

We collect information from a variety of sources, including:

- Documentation and other forms submitted which provide information such as the name, address, email address, and telephone numbers of individuals that represent our clients and assets of Clients;
- Clients' transactions or communications with us and our affiliated companies.

### **Who Has Access to Personal Information?**

We maintain personal information about our clients, their representatives and authorized persons on our Client database. Access to this database is restricted to employees of PAMI, PAM Affiliates and other Pictet Group companies that are responsible for the marketing, client relationship, and management of assets for institutional asset management clients.

### **How We Protect Personal Information?**

Our Code of Ethics, which applies to all employees restricts the use of client information, and requires that it be held in the strictest confidence and be used for valid business purposes only. The Code of Ethics also requires that all employees follow established procedures for the protection of client information. We maintain physical, electronic and procedural safeguards (including firewalls, user authentication systems and access control mechanisms) to protect personal information and to comply with all applicable laws and regulations.

### **Why and How We Share Information With Our Affiliates?**

Personal information about our clients, their representatives and authorized persons may be shared with a number of our affiliates, as described above, and as required or permitted by applicable law. All of our affiliates are companies of the Pictet Group with the same direct or indirect ownership.

By contracting with a PAM Affiliate of PAMI, clients hereby authorize such affiliate to provide PAMI with a technological solution enabling PAMI to have prompt read-only access to the assets managed at PAM Affiliates for the purpose of ongoing monitoring of business development opportunities under PAMI's marketing efforts.

### **Why and How We Share Information With Non-affiliated Third Parties?**

We do not and will not rent or sell the personal information of our clients, their representatives or authorized persons. However, we may share this information with companies that we hire to perform services for us,

such as providers of proxy voting and class action administration services. In these cases, we require these non-affiliated third parties with whom we share personal information to agree to limit the use of such information to the purposes for which it was provided.

Finally, we may disclose personal information to others, including non-affiliated companies and regulatory authorities, as required or permitted by applicable law. For example, we may disclose personal information:

- To comply with investigations by regulatory authorities or law enforcement agencies e.g. anti-money laundering investigations;
- To protect against or prevent fraud, unauthorized transactions, claims or other liabilities;
- To legal or other professional advisors, for example for the completion of statutory audits and ISAE 3402 examinations;
- To providers of certain financial products (e.g. issuers of structured products) who may require the disclosure certain client information, including details of identification. Where client agreements permit, and applicable laws allows, we require such providers to agree to strictly limit their use of the information only to the purpose for which it is provided.

**Last updated: March 29, 2019**