

# Information about the Financial Services of

Bellecapital AG

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Dear Sir or Madam

This brochure is designed to provide our clients with information about Bellecapital AG (referred to as "Bellecapital" in the following), the financial services that we offer and the associated risks; our measures to prevent loss of contact or dormancy, handling of conflicts of interest and the possibility of mediation by the ombudsman in the event of a dispute. The information in this brochure may change from time to time. You can find the latest version of this brochure on our website <https://www.bellecapital.com/en/fidleg>.

Information about the costs and fees of the financial services offered is provided separately in the respective financial services contract.

Please refer to the enclosed brochure "Risks Involved in Trading Financial Instruments" from the Swiss Bankers Association for information about the general risks associated with financial instruments. The brochure can be downloaded from the Internet <https://www.swissbanking.ch/de/downloads>.

This brochure fulfills the information obligations under the Swiss Federal Act on Financial Services Act (FinSA) and aims to provide an overview of Bellecapital's financial services. If you require any further information, please contact us.

Zürich, December 22, 2021

Bellecapital AG

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## 1. Background and Client Segmentation

### 1.1 Investor Protection

The Swiss Financial Services Act (FinSA) came into force on January 1, 2021. Among other things, FinSA aims to strengthen investor protection and the Swiss financial center and creates comparable conditions for financial service providers. It regulates the provision of financial services for clients. The law therefore particularly affects you if you conduct securities transactions with us either directly or via a financial services mandate.

The aim of the law is to provide investors with comprehensive information in the provision of financial services and thus to strengthen investor protection. If we provide you with financial services such as portfolio management, investment advice or execution of securities transactions (Execution Only), we have to comply with various rules of conduct, in particular with regard to information, organization, documentation and advertising.

### 1.2 Client Segmentation

FinSA divides clients of financial service providers into private or retail clients, professional clients or institutional clients. This classification is based on the one hand on the personal financial circumstances or the level of knowledge, experience and financial expertise of a client and on the other hand on the legally defined company size or factors such as professional treasury or prudential supervision. In a nutshell, all clients subject to a prudential supervision may be classified as institutional clients and clients which have professional treasury operations may be classified as professional clients, whilst all other clients are deemed to be private clients.

Our clients are classified as private clients and thus benefit from the most comprehensive investor protection. Switching to another segment is possible, by choice of the client and fulfilling certain selection criteria, e.g., a wealthy private client can declare that she/he would like to be viewed as a professional client and would therefore like to avail himself of less protection (opting-out). An institutional client, for example, may declare that she/he would like to be viewed as a professional client and would therefore like to take advantage of a higher level of protection (opting-in).

A description of our client segmentation is provided on our Webpage (<https://www.bellecapital.com/en/ftidleg>)

If you wish, and if you meet the requirements in terms of the volume of financial assets and, as the case may be, in terms of your financial expertise, you may apply for a change in your classification. Such change has to be done in writing. To do this, please contact your Relationship manager.

## 2. Information about Bellecapital

### 2.1 Field of activity

Bellecapital AG ("Bellecapital", or "the company" or "we"), a Swiss public company based in Zurich, Switzerland, provides asset management services for clients mostly resident in Switzerland and the European Union ("EU"). Bellecapital was established in 2009 and commenced also operations in 2009.

## Contact Information Bellecapital:

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Bellevueplatz 5  
CH-8001 Zurich  
+41 (0)44 268 11 00  
info@bellecapital.com

Commercial Register (UID) CHE-114.805.789  
VAT-Nr. CHE-114.805.789 MWST  
LEI: 254900H5CKZ034Y6TW10

## 2.2 Regulatory status, supervisory authority

Bellecapital is authorized to provide financial services in Switzerland. It is currently affiliated to the Supervisory Organization of the Association of Swiss Asset Managers ("AOOS") and has applied for a license as manager of collective assets in accordance with article 24 et seq. of the Financial Institutions Act (FinIA), to be granted by the Swiss Financial Market Supervisory Authority FINMA, Laupenstrasse 27, 3003 Bern.

## 2.3 Professional secrecy

Bellecapital is subject to the obligation of professional secrecy pursuant to the Financial Institutions Act.

## 2.4 Dormant accounts

In rare occasions, contact with clients may be lost and assets may become dormant as a consequence. Such assets may be permanently forgotten by clients and their heirs. To avoid loss of contact or dormancy, the following steps are recommended:

- ***Changes of name and address:*** Please inform us immediately if your residence, address or name changes.
- ***Special instructions:*** Please inform us of any prolonged absences and redirection of correspondence to a third-party address or retention of correspondence, as well as reachability in urgent cases during such period.
- ***Granting of powers of attorney:*** It may be advisable to designate an authorized person whom Bellecapital can approach in the event of loss of contact.
- ***Informing trusted third parties and testamentary disposition:*** Another way of avoiding loss of contact and dormancy is to inform a trusted third party of the relationship with Bellecapital. However, Bellecapital may only provide information to such a trusted third party if it has been authorized in writing to do so. Moreover, the assets in question may only be mentioned in a testamentary disposition, for example.

Bellecapital will gladly answer any questions you may have. Further information can also be found in the brochure "Guidelines on Dormant Assets" from the Swiss Bankers Association. The brochure can be downloaded from the Internet at <https://www.swissbanking.ch/de/downloads>.

### 3. Information about the financial services offered by Bellecapital

#### 3.1 Discretionary asset management

##### 3.1.1 Nature, characteristics and operating principle of the financial service

Bellecapital manages assets in the name, for the account of, and at the risk of the client, which the client has deposited at a custodian bank. Bellecapital carries out transactions at its own discretion within the agreed mandate requirements and without consulting the client. Bellecapital ensures that the transaction performed by it is in line with the client's financial situation and investment goals as well as the investment strategy agreed with the client, as well as ensuring that the structuring of the portfolio is suitable for the client.

##### 3.1.2 Rights and obligations

In the context of the asset management agreement, Bellecapital commits itself to manage the assets in your portfolio. Bellecapital selects, with due care, the assets to be included in the portfolio within the scope of the market offering considered. Bellecapital assures appropriate risk distribution, provided the investment strategy allows this. It monitors the managed assets regularly and ensures that the assets conform to the agreed investment strategy and are suitable for the client.

Bellecapital regularly updates the client about the agreed and provided management activities within the portfolio.

##### 3.1.3 Risks

Asset management, in principle, gives rise to the following risks, which are in the client's sphere of risk and are therefore borne by the client:

- ***Risk of the chosen investment strategy:*** The investment strategy agreed and chosen by the client can give rise to different risks (see below). The client bears these risks to the full extent. A description of the concrete risks and relevant risk information will be provided before the investment strategy is agreed upon.
- ***Asset maintenance risk*** or the risk of the financial instruments in the portfolio losing value: This risk, which may differ according to the financial instruments deployed in a portfolio, is borne by the client to the full extent. For the risks arising from the individual financial instruments please refer to the brochure "Risks Involved in Trading Financial Instruments" from the Swiss Bankers Association.
- ***Information risk on the part of Bellecapital*** or the risk that Bellecapital has insufficient information to be able to make a sound investment decision: For the asset management, Bellecapital takes account of the client's financial situation and investment goals (suitability check). If the client provides Bellecapital with inadequate or incorrect or incomplete information about his/her financial situation and/or investment goals, there is a risk that Bellecapital will not be able to make suitable investment decisions for the client.
- ***Risks of Collective Investment Schemes and Derivatives:*** Clients who have signed an asset management agreement with Bellecapital are regarded as qualified investors according to the Federal Act on Collective Investment Schemes. Qualified investors have access to forms of collective investment schemes that are exclusively open to them. This status allows a wider range of financial instruments to be taken into account in the structuring of the portfolio. Collective investment schemes for qualified investors may be exempt from regulatory requirements. Such financial instruments are therefore not or only partially subject to Swiss regulations. This can lead to risks, in particular due to liquidity, investment strategy or transparency. Detailed information on the risk profile of a given collective investment scheme can be found in the constituent documents of the financial instrument and, where applicable, in the key information document and the prospectus.

In addition, risks arise from the asset management activities which are within Bellecapital's sphere of risk and for which Bellecapital is liable in relation to the client. Bellecapital has taken suitable measures to counter these risks, in particular by observing the basic principle of good faith and the principle of equal treatment in its handling of client orders. Bellecapital also ensures the best possible execution of client orders.

### 3.1.4 Market offering

The market offering when selecting financial instruments primarily comprises third-party financial instruments. The following financial instruments are primarily available to the client within the scope of Bellecapital's asset management activities:

- Global registered shares;
- All freely transferable debt securities of any issuers;
- Shares in collective capital investment vehicles;
- Structured products;
- Global stock exchange listed options and futures
- OTC foreign exchange derivatives.

## 3.2 Investment advisory agreement

### 3.2.1 Nature, characteristics and operating principle of the financial service

Within the scope of comprehensive investment advice, Bellecapital provides personal recommendations to the client with regard to transactions with financial instruments, taking account of the client's entire portfolio. For this purpose, Bellecapital ensures that the recommended transaction is in line with the client's financial situation, investment goals (suitability check) and requirements as well as the investment strategy agreed with the client. The client himself then decides how far she/he wishes to follow Bellecapital's recommendation.

### 3.2.2 Rights and obligations

As part of the comprehensive advisory service, the client is entitled to personal investment recommendations, taking into account the advisory portfolio. For this purpose, Bellecapital ensures that the recommended transaction corresponds to the financial circumstances and investment objectives (suitability test) as well as the needs of the client or the investment strategy agreed with the client. Comprehensive investment advice is provided regularly in relation to financial instruments within the scope of the market offering. Bellecapital advises the client to the best of its ability and with the same care as it usually applies to its own affairs. The client decides for himself to what extent she/he would like to follow the recommendation of Bellecapital.

Bellecapital regularly checks that the structuring of the portfolio conforms to the agreed investment strategy for comprehensive investment advice. If it is established that there is a deviation from the agreed percentage structuring, Bellecapital will recommend a corrective measure to the client.

Bellecapital will inform the client promptly of any significant difficulties that may adversely affect correct handling of the order. In addition, Bellecapital will keep the client regularly informed about the agreed and provided investment advice.

### 3.2.3 Risks

Comprehensive investment advice, in principle, gives rise to the following risks, which are in the client's sphere of risk and are therefore borne by the client:

- ***Risk of the chosen investment strategy:*** The investment strategy agreed and chosen by the client can give rise to different risks (see below). The client bears these risks to the full extent. A description of the concrete risks and relevant risk information will be provided before the investment strategy is agreed upon.
- ***Asset maintenance risk*** or the risk of the financial instruments in the portfolio losing value: This risk, which may differ according to the financial instruments recommended to the client, is borne by the client to the full extent. For the risks arising from the individual financial instruments please refer to the brochure "Risks Involved in Trading Financial Instruments" from the Swiss Bankers Association.
- ***Information risk on the part of Bellecapital*** or the risk that Bellecapital has insufficient information to be able to make a suitable recommendation: When providing comprehensive investment advice, Bellecapital takes account of the client's financial situation, investment goals (suitability check) and requirements. If the client provides Bellecapital with inadequate or incorrect or incomplete information about his financial situation, investment goals or requirements, there is a risk that Bellecapital will not be able to provide the client with suitable advice.
- ***Information risk on the part of the client*** or the risk that the client has insufficient information to be able to make a sound investment decision: Even if Bellecapital takes account of the portfolio in the comprehensive investment advice, the client makes the investment decisions. The client accordingly requires expert knowledge in order to understand the financial instruments. This creates the risk for the client that she/he may not follow suitable investment recommendations due to lack of or poor financial knowledge.
- ***Risk arising from timing of the order assignment*** or the risk that the client places a sale or purchase order too late after receiving advice, which can lead to market or exchange losses: The recommendations made by Bellecapital are based on the market data available at the time the advice is provided and are only valid for a short time due to their market dependency.
- ***Risk of inadequate monitoring*** or the risk that the client does not or only inadequately monitor her/his portfolio: Before giving an investment recommendation, Bellecapital checks the composition of the portfolio. Outside the advisory service, Bellecapital has no obligation at any time to monitor the structure of portfolios. Inadequate monitoring by the client may give rise to various risks, such as concentration risks.
- ***Risks of Collective Investment Schemes and Derivatives:*** Clients who have signed an advisory agreement with Bellecapital are regarded as qualified investors according to the Federal Act on Collective Investment Schemes. Qualified investors have access to forms of collective investment schemes that are exclusively open to them. This status allows a wider range of financial instruments to be taken into account in the structuring of the portfolio. Collective investment schemes for qualified investors may be exempt from regulatory requirements. Such financial instruments are therefore not or only partially subject to Swiss regulations. This can lead to risks, in particular due to liquidity, investment strategy or transparency. Detailed information on the risk profile of a given collective investment scheme can be found in the constituent documents of the financial instrument and, where applicable, in the key information document and the prospectus.

FinSA requires providers of collective investment schemes and derivatives, including structured products and debt securities with a derivative character, to prepare a key information document that describes the functionality, risks and costs of a financial instrument. This key information document or a comparable and recognized information sheet for the respective investment in which you are investing is provided by the respective issuer of the product.

With every personal recommendation to purchase financial instruments (investment advice), private clients must be provided with this key information document or - on request - the prospectus for the financial instrument, depending on the financial instrument.

In addition, comprehensive investment advice gives rise to risks which are within Bellecapital's sphere of risk and for which Bellecapital is liable in relation to the client. Bellecapital has taken suitable measures to



counter these risks, in particular by observing the basic principle of good faith and the principle of equal treatment in its handling of client orders. Bellecapital also ensures the best possible execution of client orders.

### 3.2.4 Market offering

The market offering when selecting financial instruments primarily comprises third-party financial instruments. The following financial instruments are primarily available to the client within the scope of comprehensive investment advice:

- Global registered shares;
- All freely transferable debt securities of any issuers;
- Shares in collective capital investment schemes;
- Structured products;
- Global stock exchange listed options and futures;
- OTC foreign exchange derivatives.

## 3.3 Transaction-related investment advice

### 3.3.1 Nature, characteristics and operating principle of the financial service

Within the scope of transaction-related investment advice Bellecapital provides personal recommendations to the client in relation to individual transactions with financial instruments, without taking account of the client's entire portfolio. When providing the advice, Bellecapital takes account of the client's knowledge and experience (appropriateness test) as well as the needs of the client. Based on this, it provides the client with personal recommendations for the purchase, sale or holding of financial instruments. The client himself decides how far he wishes to follow Bellecapital's recommendation. She/he herself/himself is responsible for the structuring of his/her portfolio. The composition of the portfolio is not checked by Bellecapital.

### 3.3.2 Rights and obligations

For transaction-related investment advice, the client is entitled to personal investment recommendations. Transaction-related advice is provided regularly in relation to financial instruments within the scope of the market offering. Bellecapital advises the client to the best of its ability and with the same care as it usually applies to its own affairs.

Bellecapital will inform the client promptly of any substantial factors that may adversely affect correct handling of the order. In addition, Bellecapital will keep the client regularly informed about the agreed and provided investment advice.

### 3.3.3 Risks

Transaction-related investment advice in principle gives rise to the following risks, which are in the client's sphere of risk and are therefore borne by the client:

- ***Asset maintenance risk*** or the risk of the financial instruments in the portfolio losing value: This risk, which may differ according to the financial instrument recommended to the client, is borne by the client to the full extent. For the risks arising from the individual financial instruments please refer to the brochure "Risks Involved in Trading Financial Instruments" from the Swiss Bankers Association.
- ***Information risk on the part of Bellecapital*** or the risk that Bellecapital has insufficient information to be able to make an appropriate recommendation: When providing transaction-related investment advice, Bellecapital takes account of the client's knowledge, experience and requirements. If the client provides Bellecapital with inadequate, incorrect or incomplete information about his/her

knowledge, experience and/or requirements, there is a risk that Bellecapital will not be able to provide the client with appropriate advice.

- **Information risk on the part of the client** or the risk that the client has insufficient information to be able to make a sound investment decision: Bellecapital does not take account of the portfolio composition when providing transaction-related investment advice and does not carry out a suitability check in respect of the investment goals and financial situation. The client accordingly requires expert knowledge in order to understand the financial instruments. Therefore, transaction-related investment advice creates the risk for the client that due to lacking or poor financial knowledge she/he may make investment decisions which are not in line with his/her financial situation and/or investment goals and are therefore not suitable for her/him.
- **Risk arising from timing of the order assignment** or the risk that the client places a sale or purchase order too late after receiving advice, which can lead to market or exchange losses: The recommendations made by Bellecapital are based on the market data available at the time the advice is provided and are only valid for a short time due to their market dependency.
- **Risk of inadequate monitoring** or the risk that the client does not or only inadequately monitor his/her portfolio: Bellecapital never has an obligation to monitor, advise, warn or provide information in respect of structuring of the client portfolio as a whole. Inadequate monitoring by the client may give rise to various risks, such as concentration risks.
- **Risks of Collective Investment Schemes and Derivatives:** Clients who have signed an advisory agreement with Bellecapital are regarded as qualified investors according to the Federal Act on Collective Investment Schemes. Qualified investors have access to forms of collective investment schemes that are exclusively open to them. This status allows a wider range of financial instruments to be taken into account in the structuring of the portfolio. Collective investment schemes for qualified investors may be exempt from regulatory requirements. Such financial instruments are therefore not or only partially subject to Swiss regulations. This can lead to risks, in particular due to liquidity, investment strategy or transparency. Detailed information on the risk profile of a given collective investment scheme can be found in the constituent documents of the financial instrument and, where applicable, in the key information document and the prospectus.

FinSA requires providers of collective investment schemes and derivatives, including structured products and debt securities with a derivative character, to prepare a key information document that describes the functionality, risks and costs of a financial instrument. This key information document or a comparable and recognized information sheet for the respective investment in which you are investing is provided by the respective issuer of the product.

With every personal recommendation to purchase financial instruments (investment advice), private clients must be provided with this key information document or - on request - the prospectus for the financial instrument, depending on the financial instrument.

In addition, transaction-related investment advice gives rise to risks which are within Bellecapital's sphere of risk and for which Bellecapital is liable in relation to the client. Bellecapital has taken suitable measure to counter these risks, in particular by observing the basic principle of good faith and the principle of equal treatment in its handling of client orders. Bellecapital also ensures the best possible execution of client orders.

### 3.3.4 Market offering

The market offering when selecting financial instruments primarily comprises third-party financial instruments. The following financial instruments are primarily available to the client within the scope of transaction-related investment advice:

Available:

- Global registered shares;

- All freely transferable debt securities of any issuers;
- Shares in collective capital investment schemes;
- Structured products
- Global stock exchange listed options and futures;
- OTC foreign exchange derivatives.

## 3.4 Execution Only

### 3.4.1 Nature, characteristics and operating principle of the financial service

Execution Only limits Bellecapital's services to the mere transmission of client orders without any advice or administration. In Execution Only, orders are initiated exclusively by the client and transmitted by the relationship manager. Bellecapital does neither examine if the transaction in question corresponds to the knowledge and experience (appropriateness) nor if it is in line with the financial circumstances and investment objectives of the client (suitability).

### 3.4.2 Rights and obligations

Within the scope of Execution Only, the client has the right to place orders to buy or sell financial instruments within the framework of the market offer taken into account. Bellecapital has the duty to transmit orders placed for execution with the same care that it uses in its own affairs.

Bellecapital shall inform the customer immediately of all material circumstances that could impair the correct processing of the order. Furthermore, Bellecapital regularly informs the customer about the placed and the booked orders.

### 3.4.3 Risks

Execution Only gives rise to the following risks, which are in the client's sphere of risk and are therefore borne by the client:

- ***Asset maintenance risk*** or the risk of the financial instruments in the portfolio losing value: This risk, which may differ according to the financial instrument recommended to the client, is borne by the client to the full extent. For the risks arising from the individual financial instruments please refer to the brochure "Risks Involved in Trading Financial Instruments" from the Swiss Bankers Association.
- ***Information risk on the part of the client*** or the risk that the client has insufficient information to be able to make a sound investment decision: In Execution Only, the client takes investment decisions on his own, without any support of Bellecapital. Accordingly, the client needs expertise to understand the financial instruments and time to deal with the financial markets. If the client does not have the necessary knowledge and experience, she/he runs the risk of investing in financial instruments which are inappropriate for her/him.

Therefore, Execution Only creates the risk for the client that due to lacking or poor financial knowledge he may make investment decisions which are not in line with his financial situation and/or investment goals and are therefore not suitable for him.

- ***Risk arising from timing of the order assignment*** or the risk that the client places a sale or purchase order too late, which can lead to market or exchange losses.
- ***Risk of inadequate monitoring*** or the risk that the client does not or only inadequately monitor his portfolio: Bellecapital never has an obligation to monitor, advise, warn or provide information at any time. Inadequate monitoring by the client may give rise to a wide variety of risks, including concentration risks.

In addition, transaction-related investment advice gives rise to risks which are within Bellecapital's sphere of risk and for which Bellecapital is liable in relation to the client. Bellecapital has taken suitable measure to counter these risks, in particular by observing the basic principle of good faith and the principle of equal treatment in its handling of client orders. Bellecapital also ensures the best possible execution of client orders.

## 4. Information on Fees

On the one hand, there are fees and expenses that are debited directly to your account. These are mainly your bank's administration- and transaction fees (charged per transaction) and Bellecapital's expenses for services such as portfolio management or personal investment advice which you find in the respective contractual documents.

On the other hand, certain fees and expenses are charged directly to the financial instruments deployed or recommended. These are, for example, management fees for collective investment schemes. Information on the fees for individual financial instruments can be found on the relevant key information document, prospectus or a comparable and recognized information sheet for the investment in which you are investing.

## 5. Handling conflicts of interest

### 5.1 In general

When providing financial services, situations may occur in which opposing interests arise, which lead to clients being disadvantaged (so-called "conflicts of interest"). Such conflict situations need to be recognized at an early stage and eliminated as far as possible with suitable measures or, if this is not sufficiently possible, transparently disclosed to clients. Bellecapital has taken organizational and regulatory precautions to prevent possible conflicts of interest and to handle and/or disclose such conflicts of interest, if any, in accordance with legal requirements.

### 5.2 Inducements

In general, Bellecapital does not accept any sales commission or trailer fees, other fees (such as retrocession payments) or discounts from third parties. It is, however, possible that we may receive other non-cash benefits from third parties, such as financial analysis (research) free of charge or other sales support services (e.g. employee training, technical support, information material, etc.).

Under specific circumstances, in particular, when adequate reductions on fees and commissions cannot be obtained from particular depositories, broker or issuers, Bellecapital may accept payments in connection with transactions executed or investments made on behalf of clients, in order to observe the principle of best execution in the clients' interest. Such payments will be credited to the clients as agreed in the respective portfolio management or advisory agreement.

Only upon a client's explicit request, and in exceptional cases, Bellecapital would agree with a client a remuneration system that includes payments from third parties that shall be for the benefit of Bellecapital. In such circumstances, a special agreement has to be executed by Bellecapital and the individual client which shall also depict size and source of payments that may be collected.

Bellecapital reserves the right to grant inducements to third parties (e.g. client introducers) for the acquisition of clients and/or the performance of certain services. The calculation of such inducements is generally based on the fees charged to the client. These inducements will not cause any additional costs to our clients. Upon request, we will be happy to disclose further details on such agreements with third parties.

### 5.3 Further information

Bellecapital will be happy to provide you with further information about potential conflicts of interest in connection with the services provided by it and the precautions taken to protect the client.

### 6. Ombudsman service

Your satisfaction is important to us. Should you have any concerns, please do not hesitate to contact your Relationship manager directly. She/he will respond to your request immediately and work with you to find an amicable solution. If you have a complaint, you can also contact us directly by email ([info@bellecapital.ch](mailto:info@bellecapital.ch)).

If the solution to your request is not to your satisfaction, you may contact the Ombudsman. The Ombudsman is a neutral information and mediation agency. He deals with specific client complaints against a provider of financial services in Switzerland. The Ombudsman usually only becomes active after the client or the financial service provider has submitted a request for mediation. The mediation procedure before the Ombudsman is free of charge for clients.

#### Contact Information Ombudsman:

Name	OFS Ombud Finance Switzerland
Address	10 rue du Conseil-Général
Postcode / City	1205 /Geneva
Phone	+41 22 808 04 51
Website	<a href="http://www.ombudfinance.ch">www.ombudfinance.ch</a>

The information contained in this document corresponds to the information obligation according to the Federal Law on Financial Services of June 15, 2018 (950.1 - FinSA, Articles 8 and 9) and the associated ordinance (950.11 - FinSA, Articles 6 to 15) of November 6, 2019. This document does not constitute a contract or an advertisement.