

## Information for Prospective and Existing Investors in Switzerland

### 1. Provision of financial services under the Swiss Financial Services Act ("FinSA")

HarbourVest Partners (U.K.) Limited (the "**Firm**") performs the following financial activity in Switzerland to fund investors ("**clients**") in relation to certain HarbourVest funds (each a "**Fund**") managed by the HarbourVest Group and its affiliates ("**HarbourVest**"), which qualifies as financial service under FinSA (the "**Services**");

- purchase and sale of financial instruments (in particular collective investment schemes), meaning any activity which ultimately targets the purchase and sale of financial instruments to per se Professional and Institutional investors (each, a "**client**") within the meaning of FinSA, at the exclusion of high-net-worth retail individuals ("**HNWIs**") with opting-out and Retail clients (as defined below).

As part of the Services, the Firm will not provide investment advice to its clients or perform for them any execution of orders of financial instruments, including collective investment schemes.

Products and services offered by the Firm are issued and/or managed by HarbourVest.

### 2. Client Classification

The rules of conduct that the Firm must comply with under FinSA (the "**Code of Conduct Rules**") differ according to the client's category.

In order to define the level of client protection, the Firm classifies its clients into one of the three categories presented in the table below:

Institutional clients	<p>a. Financial intermediaries as defined in the Federal Banking Act ("<b>BA</b>"), Federal Financial Institutions Act ("<b>FinIA</b>") and the Federal Collective Investment Schemes Act ("<b>CISA</b>"), i.e. banks, securities firms, fund management companies, managers of collective assets, portfolio managers, trustees, representatives of foreign collective investment schemes, SICAV, limited partnership for collective investment, SICAF</p> <p>b. Insurance companies as defined in the Federal Insurances Supervision Act ("<b>ISA</b>")</p> <p>c. Foreign clients subject to a prudential supervision as the entities listed under a. and b. above</p>
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	<p>d. Central banks e. National and supranational public entities with professional treasury operations*</p> <p>f. Other Swiss/foreign collective investment schemes and their management companies, which are not covered by lit. a-e but have declared that they wish to be treated as institutional clients</p>
Professional clients	<p>g. Public entities with professional treasury operations*</p> <p>h. Pension funds/schemes with professional treasury operations*</p> <p>i. Companies with professional treasury operations*</p> <p>j. Large companies, i.e. companies which exceeds two of the following criteria: (i) balance sheet total of CHF 20 million; (ii) turnover of CHF 40 million and (iii) capital equity of CHF 2 million</p> <p>k. Private investment structures with professional treasury operations* created for high-net-worth retail client</p> <p><b>(“per se Professional clients”)</b></p> <p>l. High net worth retail clients and private investment structures created for them without professional treasury operations, having declared that they wish to be considered as Professional clients</p>
Retail clients	All other types of clients

*\*An entity is deemed to have professional treasury operations if its finances are managed, on a durable basis, by a professionally qualified person with experience in the financial sector, regardless of the fact that this person is internal or external to such entity.*

The Firm is obligated to inform clients of their opting-in (“**opt-in**”) or opting-out (“**opt-out**”) rights before the provision of the Services.

Institutional and Professional clients may opt-in for more protection under FinSA by choosing to be classified (i) as Professional clients for Institutional clients, or (ii) as Retail clients for Professional clients.

Professional clients under (h) and (i) above (i.e., pension funds/schemes with professional treasury operations and companies with professional treasury operations) may opt-out to be considered as Institutional clients, thus foregoing the application of Code of Conduct Rules.

The Firm only provides financial services to Institutional and *per se* Professional Clients, but never to Retail clients, and to HNWIs and private investment structures created for them without professional treasury operations, having declared that they wish to be considered as Professional Clients pursuant to Art. 5 para. 1 and 2 FinSA.

In order to change client classification, a request must be made in writing by means of the relevant opt-in or opt-out form provided to the client by the Firm.

### **3. Code of Conduct Rules (applicable to professional clients only)**

#### **3.1. General Information**

For general information about the Firm and HarbourVest, please [click here](#).

#### **3.2. Important Information and Risk Factors**

For important information and risk factors relating to the Firm, HarbourVest, and the Fund, please [click here](#).

### **3.3. Suitability and Appropriateness Assessment**

The Firm does not perform any suitability or appropriateness verification for clients in case of a purchase and sale of financial instruments.

The appropriateness and suitability assessment depend both on the client classification as well as the financial service rendered to the client. Accordingly, they do not apply with regard to Institutional clients.

With regard to Professional clients, the Firm assumes in accordance with FinSA that they have the required level of knowledge and experience and can financially bear the investment risks associated with the Services.

### **3.4 Cost and Fees**

The Firm does not charge fees for the provision of the Services to the clients.

### **3.5 Conflicts of Interests**

The Firm has not identified any actual or potential material conflict of interests that may arise from the provisions of the Services.

For information on other conflict of interests that may arise in relation to an investment in the Fund, please refer to the relevant Fund documentation as well as any other relevant disclosures made available by the Firm and/or HarbourVest, as required under applicable laws and regulations.

## **4. Internal Organisation and Governance (applicable to all clients)**

### **4.1 Third Party Compensation**

The Firm does not receive compensation from third parties in relation with the provision of the Services.

### **4.2 Conflicts of Interests**

The Firm does not foresee a disadvantage from any direct conflict of interests in relation to the Services provided that may not be excluded by organisational measures or only with a disproportionate amount of effort.

Please refer to section 3.5 for additional information on conflicts of interests.