Brochure/Form ADV Part 2A

SEQUOIA Swiss Financial Advisors AG

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CRD: 158031

I. Cover Page

This brochure provides information about the qualifications and business practices of SEQUOIA Swiss Financial Advisors AG ("SEQUOIA SFA").

For additional information about the contents of this brochure, please contact us by telephone at +41 44 575 22 20 or by e-mail at **lehmann@sequoia-sfa.ch**. The information in this brochure has not yet been approved or verified by the United States Securities and Exchange Commission ("SEC") or by any state securities authority. Additional information about SEQUOIA SFA is also available on the SEC's website at www.adviserinfo.sec.gov .

The oral and written communications of an adviser provide you with information with which you determine to hire or retain an adviser.

II. Material Changes

SEQUOIA SFA's most recent update to Part 2 of Form ADV was made in February 2026. Since this last SEQUOIA SFA's business activities have not changed materially since the last update.

III. Table of Contents

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IV. Advisory Business

SEQUOIA SFA Financial Advisors AG ("SEQUOIA SFA"), based in Zurich, Switzerland, is a corporation formed under the laws of Swiss law. SEQUOIA SFA provides investment advisory services to clients internationally. SEQUOIA SFA was formed in March 2011 at the direction of Thomas Lehmann, CFA.

SEQUOIA SFA provides Discretionary Asset Management and Non-Discretionary Advisory services through accounts maintained at qualified custodian Banks recommended by SEQUOIA SFA. The majority of custodian banks which SEQUOIA SFA works together with are regulated by Swiss Federal Financial Market Supervisory Authority (FINMA).

SEQUOIA SFA works with the broker determined by the custodian bank selected by the client. The broker may or may not be a broker registered with the U.S. Securities and Exchange Commission.

Standard reference currencies are CHF, EUR, and USD, however a client may choose other currencies as a reference for the portfolio.

a) Discretionary Services

SEQUOIA SFA offers Portfolio Management (Discretionary) Services primarily to individuals, trusts, foundations and companies.
Under a Portfolio Management Mandate, SEQUOIA SFA provides clients with discretionary investment management services in accordance with the client's investment strategy and subject to any restrictions that are established by the client and accepted by SEQUOIA SFA, at SEQUOIA's sole discretion. Investment supervisory services are provided based on the individual needs and investment objectives of each client as communicated to SEQUOIA SFA. Specifically, the structure for each client's investment program is created in the context of certain considerations such as expected returns, risk tolerance, future liquidity requirements and potential legal restrictions.
The client chooses one out of five investment strategies: **Fixed Income, Yield, Balanced, Growth**, **Individual Mandate**. The **Fixed Income Strategy** seeks income generation and long-term capital preservation. The **Yield** strategy seeks income generation and long-term capital appreciation with moderate volatility. The **Balanced** strategy seeks a balance of income and long-term capital appreciation generated by a broad mix of interest, income and capital gains with medium volatility. The **Growth** strategy seeks significant long-term capital appreciation with modest interest income and dividend yield with above average volatility. The **Individual Mandate** offers clients the possibility to specify and individualize their asset allocation. SEQUOIA SFA **does not** select the broker or dealer for effectuating securities transactions and does not negotiate the commission rates paid to effectuate transactions.

b) Non-Discretionary Services

SEQUOIA SFA provides investment advisory (non-discretionary) services primarily for individuals, trusts, foundations, and companies. The services provided include the provision of periodic advice concerning asset allocation and the investment of individual securities which are consistent with objectives and risk tolerance of each client. Investment advisory services are provided based on the individual needs and investment objectives of each client as communicated to SEQUOIA SFA.

Under a non-discretionary management mandate, SEQUOIA SFA can make investment recommendations to a client should there be a need to, however the client subsequently makes all decisions about the investments held in the account. Sequoia does not provide active stock trading and market timing advice. In order to implement the client's decisions, the client may authorize SEQUOIA SFA to place orders for the execution of securities transactions for the client's account. In such cases, SEQUOIA SFA does not select the broker or dealer used for effectuating such securities transactions and does not negotiate the commission rates paid.

c) Assets under Management

SEQUOIA SFA managed approximately $212 million in Assets ($140 million on a discretionary basis and $72 million on a non-discretionary basis) as of January 1, 2026.

V. Fees and Compensation

The standard asset management and advisory fee schedule is in a range of 0.5% to 1.2% of assets under management. Fees charged to each client may be negotiable based on factors such as the selected investment strategy, overall complexity of the service provided, size, or other specific circumstances. The exact services and fees will be agreed upon and stated in the investment advisory agreement prior to services being provided.
Fees are deducted directly from the client's account. SEQUOIA SFA's annual fee charged to clients is billed quarterly in arrears based on the average value of the account for three previous months.

SEQUOIA SFA is entitled to charge the Client for additional work, such as special portfolio analysis, consulting, or other special services or regulatory costs in excess or addition to the Asset Management or Investment advisory services agreed upon.

Safekeeping and Transaction fees will be charged by the custodian directly to the client.

VI. Performance – Based Fees and Side-by Side Management

SEQUOIA SFA does not charge any performance-based fees (fees based on a share of capital gains or capital appreciation of the managed assets).

VII. Types of Clients

SEQUOIA SFA offers investment management services to individuals, trusts, estates, corporations and other business entities or foundations.

SEQUOIA SFA prefers a minimum account size of USD 250’000.--, but may waive this requirement at its sole discretion.

VIII. Methods of Analysis, Investment Strategies and Risk of Loss

Methods of Analysis:

SEQUOIA SFA utilizes a variety of methods and strategies to make investment decisions and recommendations. The methods of analysis include various aspects of fundamental research and technical analysis.

SEQUOIA SFA's investment process incorporates fundamental research (both macro- and micro-economic analysis) along with technical analysis to determine both the strategic (Long-tem) and Tactical (Short-term) asset allocation. Active management of tactical allocations is made based on compelling market dislocations and/or longer term economic trends.

SEQUOIA SFA provides mainly International advice on:

- Global Equities
- Government and Corporate debt securities
- Short term money market instruments
- Global Mutual Funds and Exchange-traded fund shares
- Structured Products and Derivatives
- Currencies and Precious Metals
- Alternative investments

SEQUOIA SFA's main sources of information for its investments are

• Investment research provided by various banks which SEQUOIA SFA works together
• Financial journals, newspapers, and other financial media
• Research materials prepared by other sources;
• Company press releases
• Real time financial market research and quotation services

Investment Strategies:

The **Fixed Income Strategy** seeks income generation and long-term capital preservation. The **Yield** strategy seeks income generation and long-term capital appreciation with moderate volatility. The **Balanced** strategy seeks a balance of income and long-term capital appreciation generated by a broad mix of interest, income and capital gains with medium volatility. The **Growth** strategy seeks significant long-term capital appreciation with modest interest income and dividend yield with above average volatility. The **"Individual Mandate"** offer clients the possibility to specify and individualize their asset allocation.

Risks:

Economic/Market: Economic forces and market conditions, which are beyond SEQUOIA SFA's control, causing unfavorable changes to security valuations and in currency exchange rates which could result in negative returns to the investment portfolio.

Issuer and Counterparty Risk: Changes in the financial conditions of an issuer or counterparty, or severe changes in general political or economic conditions can increase the risk of default by an issuer or counterparty, which could negatively affect the security or instrument value.

Investment Strategy: SEQUOIA SFA bases its investment strategies and advice on available research which enables the firm to best evaluate and monitor economic trends or changes, and anticipate the direction and magnitude of these changes and its subsequent effect on markets and securities. There can be no guarantee that SEQUOIA SFA will successfully anticipate and implement these changes at all times.

Leverage: SEQUOIA SFA does not use leverage within its managed portfolios

Illiquidity: Some investment instruments may have no readily available market or third-party pricing. Reduced market liquidity for certain securities could make it difficult for SEQUOIA SFA to purchase or sell an illiquid security, or to obtain a market quotation for the purpose of valuing a portfolio.

IX. Disciplinary Information

SEQUOIA SFA is not involved in any disciplinary or legal events.

X. Other Financial Industry Activities and Affiliations

SEQUOIA SFA is a licensed as an assert manager by the Swiss Financial Market Supervisory Authority FINMA and is supervised by it and OSFIN (Organisation de surveillance fincnière), a FINMA authorized supervisory partner, in accordance with the Federal Financial Institutions Act FinIA.

SEQUOIA SFA is also a member of Swiss Arbitration Centre, an independent institution that provides arbitration, dispute resolution, and mediation services.

SEQUOIA SFA is not registered and does not have an application pending as a securities broker dealer, a futures merchant, commodity pool operator or a commodity trading adviser. None of SEQUOIA SFA's personnel are associated with a broker dealer or futures or commodity firm.

XI. Code of Ethics, Participation or Interest in Client Transactions and Personal Trading

Code of Ethics:

SEQUOIA SFA's has adopted a Code of Ethics is based on the regulations of the U.S. Securities and Exchange Commission and the Swiss Financial Market Supervisory Authority FINMA, as well as the standards covered by the CFA Institute Code of Ethics and Standards of Professional Conduct.

These rules obligate SEQUOIA SFA and its related persons to put the interests of SEQUOIA's clients before their own interests, and to act honestly and fairly in all their dealings with clients. Specifically, the "Rules of Conduct" covers the Duties of Trust; Duties of Confidentiality, Duties of Investigation (Know Your Customer), Duties of Accountability in Investment and Transactions; Duties of Due Diligence; and Duties of Compensation.

SEQUOIA SFA and its related person's, must at all times give continuous, professional and unbiased advice; and at all times act in the client's best interest while performing its duties as Investment Adviser and within the scope of its fiduciary responsibilities.

SEQUOIA SFA has a fee only compensation policy; avoiding the collection of third party compensation and potential conflicts of interest which could result.

Participation or Interest in client transactions:

SEQUOIA SFA and its related persons may buy or sell securities that are also recommended to clients. To this extent, in accordance with its fiduciary duty to its clients, SEQUOIA SFA and its related persons will always place clients' interests ahead of their own interests. Any private transaction must be executed in a manner that does not work to the disadvantage of clients' transactions or result in any conflicts of interest. Security recommendations and subsequent transactions for clients are based solely on the perceived advantage/disadvantage of the security in relation to the client's investment objectives and for the clients' economic benefit.

XII. Brokerage Practice

SEQUOIA SFA does not select a broker-dealer to execute transactions. All clients of SEQUOIA SFA maintain custody of their assets at one or more custodian banks. Each individual custodian bank maintains relationships with designated broker-dealers, and it is up to the custodian to choose the broker in order to get the best execution for the clients.

Although SEQUOIA SFA may execute block orders for clients at the same custodial bank, it does not aggregate client transactions among different custodial banks. As such, transaction costs and commissions may vary.

XIII. Review of Accounts

Portfolios are reviewed on an ongoing basis to determine whether the portfolio asset allocation and investments are meeting expectations. More in-depth analysis is undertaken periodically to ensure that the portfolios are consistent with the investment objectives and individual wishes agreed upon between SEQUOIA SFA and the client.

Global economic and political events which may have significant effects on world asset prices will also trigger specific reviews in relation to the individual portfolio management mandates.

Clients are provided with a portfolio report on demand or periodically as arranged, at a minimum at the end of each year. The portfolio report is generally created by the Custodian Bank where the actual assets are held.

XIV. Client Referrals and Other Compensation

SEQUOIA SFA does not receive compensation from third parties in relation to the advice it gives to its clients.

SEQUOIA SFA may have arrangements to directly compensate any individual or entity for Client referrals. This has no effect on a client's agreed upon fee.

XV. Custody

SEQUOIA SFA does not provide custodial or other banking services to clients. Clients will maintain individual custodial and other banking services with a qualified custodial bank with which SEQUOIA SFA works together. A client chooses and establishes the bank account relationship directly, and receives all traditional banking services (i.e. checks, transfers, withdrawals, etc.) directly from the Bank where the assets are held. Securities and other assets are always held at the bank separately for each individual client.

XVI. Investment Discretion

SEQUOIA SFA and each individual client enter into a written contractual agreement (SEQUOIA SFA "Asset Management Contract") which can give authority to SEQUOIA SFA within the framework of its portfolio management duties to determine without consultation, the asset allocation as well as the securities which are bought or sold in a clients account.

In all cases, SEQUOIA SFA has a limited power of attorney on behalf of the client with the selected Custodian bank. SEQUOIA SFA at no time is authorized to transfer or withdraw funds apart from the agreed fee.

XVII. Voting Client Securities

SEQUOIA SFA may acquire the right to vote proxies with respect to securities invested in a clients portfolio and for which it executes trades on behalf of it clients. According to SEQUOIA SFA's adapted code of ethics, proxies will be voted in the best interest of the individual client, and in accordance with applicable regulations.

XVIII. Financial Information

SEQUOIA SFA has not been the subject of any bankruptcy petition, nor does it have any financial condition which will impair our ability to meet our contractual commitments. SEQUOIA SFA does not require or solicit prepayment of more than USD 1,200 in fees per client six months or more in advance.

XIX. State Registered Investment Advisers

Not applicable