



PICTET

瑞士百達資產管理

百 達 證 券 投 資 顧 問 股 份 有 限 公 司 函

聯絡地址：台北市信義區松仁路 32 號 8 樓之 1

聯絡人：陳禮怡 專線：02-6622-6606

電子信箱：emchen@pictet.com

受文者：安達人壽保險股份有限公司台灣分公司

發文日期：中華民國 111 年 04 月 26 日

發文字號：百達顧字第 111033 號

附 件：中英文銷售機構通知書

主旨：通知本公司總代理之瑞士百達基金即日起不得銷售予俄羅斯及白俄羅斯之國民及居民，詳如說明，請 查照。

說明：

- 一、在烏克蘭當前局勢背景下，歐盟理事會及瑞士聯邦委員會近期陸續發佈限制性措施，禁止俄羅斯及白俄羅斯國民及居民投資於註冊地為盧森堡及瑞士的基金。詳細內容請詳附件通知書。
- 二、本公司總代理之瑞士百達基金註冊地為盧森堡，因此有義務遵守此限制性措施，同時確保本公司簽約之銷售機構及保險公司亦遵守此規範。
- 三、本公司即日起不再接受俄羅斯及白俄羅斯國民及居民之任何新申購(含定期定額)及轉申購，謹請 貴公司依內部相關規定惠予處理為荷。
- 四、若您有任何疑問，歡迎致電台灣總代理人百達投顧，電話：(02)6622-6600。

總經理 林秋瑾

(節譯文)

2022年4月25日，日內瓦

主旨：致瑞士百達基金分銷商之通知

親愛的先生或女士，

謹參酌 Pictet Asset Management 與 貴公司就瑞士百達基金之分銷所簽署之合約（下稱「雙方合約」）。

如您所知，於烏克蘭當前局勢背景下，近來數個國家已採取部分之限制性措施，其中包含：

- 2022 年 2 月 25 日之歐盟理事會第 2022/328 號規則第 5f 條，該規則係修訂歐盟第 833/2014 號鑒於俄羅斯破壞烏克蘭局勢穩定行動之限制性措施規則，
- 2022 年 3 月 9 日之歐盟理事會第 2022/398 號規則第 1y 條，該規則係修訂歐盟第 2006/765 號鑒於俄羅斯破壞烏克蘭局勢穩定行動所採取之限制性措施規則，
- 2022 年 3 月 4 日之瑞士聯邦委員會第 946.231.176.72 號條例就烏克蘭局勢採取之措施第 23 條，
- 2022 年 3 月 16 日之瑞士聯邦委員會第 946.231.116.9 號條例就烏克蘭局勢採取之措施第 21 條。

(以下合稱「規則」)。

由於 Pictet Asset Management SA 及 Pictet Asset Management (Europe) SA (合稱「Pictet Asset Management」)，分別係瑞士註冊及盧森堡註冊之瑞士百達基金管理公司，其有適用規則之義務。Pictet Asset Management 必須相對確保其所委任之分銷商亦嚴格遵守規則中所包含之限制性措施。

因此，我們謹提醒所有分銷商，其應遵守上述制裁及任何其他限制性措施，或其他現行有效或未來可能施行之制裁之合約義務。

尤其是，我們謹請您：

(中譯文僅供參考，與原文相較不盡完整，亦有歧異，如有疑義應以英文本為準)

- 辨識目前投資於任何瑞士百達基金之俄羅斯及白俄羅斯國民及居民，並封鎖其任何的額外投資或移轉至不同的瑞士百達基金，除非其得證明其有歐盟（或瑞士，視情況而定）之居留許可。

- 防止任何俄羅斯及白俄羅斯國民及居民就瑞士百達基金進行新的投資，除非其得證明其有歐盟（或瑞士，視情況而定）之居留許可。

謹進一步提醒，如任一您投資於瑞士百達基金的客戶受到制裁，請務必通知 Pictet Asset Management。

請將此封信傳送給您認為必要的相關部門。

最後，如貴公司已將瑞士百達基金之分銷委任其他實體（次分銷商），您有義務確保此等受委任實體亦遵守上述規則。

如您需任何進一步資訊，請聯繫：

Pictet_AM_Fund_Compliance@pictet.com.

您誠摯地，

Armand CELA



Pictet Asset Management



Luca DI PATRIZI

Geneva, April 25th, 2022

Re: Notice to Distributors of the Pictet funds

Dear Sir or Madam,

We refer to the agreement signed between Pictet Asset Management and your company (hereafter "**our Agreement**") in relation with the Distribution of the Pictet funds.

As you know, in the context of the current situation in Ukraine, a number of countries have recently taken some restrictive measures, among which:

- **Article 5f of the European Council Regulation (EU) 2022/328 of 25 February 2022 amending Regulation (EU) No 833/2014 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine;**
- **Article 1y of the Council Regulation (EU) 2022/398 of 9 March 2022, amending Regulation (EU) No 765/2006 concerning restrictive measures in view of Russia's actions destabilising the situation in Ukraine;**
- **Article 23 of the Ordinance 946.231.176.72 of March 4, 2022, of the Swiss Federal Council imposing measures in relation to the situation in Ukraine;**
- **Article 21 of the Ordinance 946.231.116.9 of March 16, 2022, the Swiss Federal Council imposing measures in relation to the situation in Ukraine.**

(hereafter together referred to as the "**Regulations**").

As Management Company of, respectively, the Swiss Pictet Funds and the Luxembourg Pictet funds, Pictet Asset Management SA and Pictet Asset Management (Europe) SA (together referred to as "**Pictet Asset Management**"), are under the obligation to apply the Regulations. Pictet Asset Management must accordingly ensure that its delegated distributors also strictly abide with the restrictive measures contained in the Regulations.

Therefore, we are hereby reminding to all our Distributors their contractual obligation to comply with the abovementioned sanctions, as well as with any other restrictive measure or other sanction currently in force or which could be implemented in the future.

In particular, we request that you:

- identify Russian and Belarussian nationals and residents presently invested in any Pictet fund and block any additional investment or transfer to a different Pictet fund, unless EU (or Swiss, as the case may be) residence permit can be evidenced
- prevent any Russian and Belarussian nationals and residents from making a new investment in the Pictet funds, unless EU (or Swiss, as the case may be) residence permit can be evidenced.

Please be further reminded that you must inform Pictet Asset Management in the event that one of your customers invested in the Pictet funds becomes subject to sanctions.

Please do forward this communication to the relevant department if necessary.

Finally, in case your company has delegated the distribution of the Pictet funds to other entities (sub-distributors), it is your obligation to ensure that the above rules are abided with by such delegated entities.

Should you need any further information, please contact:

[Pictet AM Fund Compliance@pictet.com](mailto:Pictet_AM_Fund_Compliance@pictet.com).

Yours faithfully,

Pictet Asset Management

Karine Valtanen



Armand Cela

