



EDMOND
DE ROTHSCHILD

IDENTIFICATION & VERIFICATION FORM

CORPORATE AND
INSTITUTIONAL
INVESTORS



EDMOND DE ROTHSCHILD, BOLD BUILDERS OF THE FUTURE.



1. INTRODUCTION

Acting as central administration on behalf of its clients (each a “Fund”), Edmond de Rothschild Asset Management (Luxembourg) (“EDRAM”) is required to complete, under local applicable laws, particularly relating to the prevention of money laundering, Due Diligence duties on investors.

This Identification Form is aimed to identify and verify the identity of the investors and of the relevant party(ies) involved in their controlling/ownership structure as well as the source of the funds that are to be invested. Such verification must be supported by relevant documentation and evidences.

This questionnaire collects the information usually required to comply with the legal/regulatory requirements. As the information needed vary depending on the investor type and the assessed risk, the list of information and documentation required in this form is non-exhaustive. Following the receipt and verification of material, Edmond de Rothschild Asset Management (Luxembourg) (or its processing agent CACEIS Bank Luxembourg Branch) may request additional information.

Subsequent subscriptions of shares/units/interests within the Fund(s) shall not require again the investor to provide Edmond de Rothschild Asset Management (Luxembourg) with the identification documents to the extent that the investor’s situation has remained unchanged since the previous subscriptions.

Notwithstanding the foregoing, the account holder may be requested to provide additional or updated identification documents from time to time pursuant to on-going due diligence requirements under relevant laws and regulations.

In case of delay or failure by the account holder to provide the required documents, the application for shares or units subscription may not be accepted and in case of a shares or units redemption request, the payment of the redemption proceeds and/or distributions may not be processed. Neither the Fund(s) nor Edmond de Rothschild Asset Management (Luxembourg) shall have any liability for delays or failure to process orders into the Fund(s) as a result of the account holder providing incomplete documentation.

In order to open your register account with Edmond de Rothschild Asset Management (Luxembourg), please complete the following sections of this Form:

- ▶ Customer
- ▶ Ultimate Beneficial Owners
- ▶ Controlling Persons
- ▶ Other Board Members not qualifying as Controlling Persons
- ▶ Authorized Signatories
- ▶ Source of funds
- ▶ Taxation
- ▶ Bank details
- ▶ Representation

Please first return this questionnaire and the relevant documents required in Appendix 1 by email to FDS-Account-Openings@caceis.com (for account opening purposes) or to FDS-Account-Maintenance@caceis.com (for due diligence purposes).

After analysis of the documents, you will be contacted by Edmond de Rothschild Asset Management (Luxembourg) or its processing agent CACEIS Bank Luxembourg Branch, with the confirmation that the received package is complete or with a list of additional needed information / documents.



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The documents in the original format must be sent to a dedicated mail address which will be communicated to you once the analysis and acceptance of the documentation received in copy has been confirmed.

IMPORTANT: Please be sure to complete all fields that are marked with an asterisk (* mandatory field) and fill in the form in **BLOCK CAPITALS**



2. CUSTOMER

<input type="checkbox"/> Bank	<input type="checkbox"/> Asset Manager	<input type="checkbox"/> Trust / Trustee	<input type="checkbox"/> Corporate
<input type="checkbox"/> Nominee	<input type="checkbox"/> Insurance Company	<input type="checkbox"/> Limited Partnership	<input type="checkbox"/> Fiduciary
<input type="checkbox"/> Association	<input type="checkbox"/> Foundation	<input type="checkbox"/> Investment / Mutual Fund	
<input type="checkbox"/> Pension Fund / Scheme			
<input type="checkbox"/> Other financial institution (Please specify):		<input type="checkbox"/> Other (please specify):	

Legal Entity name*

Legal form*

Place of listing* (if applicable)

Company object / Type of activities*

Trade Register number*

VAT number

Date of incorporation*

Country of incorporation*

If the company is regulated or supervised:*

Name of regulatory or supervisory authority

Registration number

REGISTERED OFFICE ADDRESS

Street/No.*

City*

Postal code*

Country*

Telephone number

Email*

Fax

CORRESPONDENCE ADDRESS, IF DIFFERENT FROM THE REGISTERED OFFICE

Street/No.

City

Post code*

Country



IF THE LEGAL ENTITY IS REPRESENTING AN INSTRUMENT (PENSION PLAN, COLLECTIVE INVESTMENT SCHEME, TRUST...) WITH OR WITHOUT LEGAL PERSONALITY

Name of the Instrument*

Legal form*

Object of the Instrument*

PRIMARY CONTACT PERSON

First and last name (and/or department name)

Telephone number

Email*

Fax



3. SHAREHOLDERS OF THE LEGAL ENTITY THAT QUALIFY AS ULTIMATE BENEFICIAL OWNERS

A shareholder qualifies as Ultimate Beneficial Owner if it owns – directly or indirectly – more than 25% of the investor share capital/voting rights of the Legal Entity.

With regards to foundations, trusts and other Legal Arrangements, the table below shall be completed for:

- the beneficiary of the foundation, trust or the other legal arrangement;
- the trustee (or equivalent);
- the settlor / the founder under it is a listed corporate (or part of a group the mother company of which is a listed corporate);
- the protector

Identification of the shareholders that qualify as Ultimate Beneficial Owners of the Legal Entity (if any):

If the here above described conditions are met, please provide the list of natural persons that have a direct ownership of 25% or more of the shares of the Legal Entity or of a shareholding entity (holding more than 25% of the shares of the Legal Entity):

Full name	Place and date of birth	Address	Legal entity held	Percentage of ownership
				____.____%
				____.____%
				____.____%
				____.____%
				____.____%
				____.____%

For each of the natural persons above, please complete the Appendix 2 and the Appendix 3.

In case the Legal Entity is held by other shareholding entities, please provide, in addition to the above, an ownership structure of the Legal Entity.



4. CONTROLLING PERSONS OF THE LEGAL ENTITY (OTHER THAN SHAREHOLDERS)

This section shall be completed if no shareholder qualifies as an Ultimate Beneficial Owner (pursuant to section 3).

Controlling Persons are then the natural persons who exercise control over the Legal entity, typically:

- Any natural person that holds more than 25% of the voting rights; or
- All natural persons that act in concert and that together hold more than 25% of the voting rights; or
- Any natural person that has a veto right on the decisions taken by the Senior Managing Official(s); or
- The Senior Managing Official(s), i.e. the Managing Director or the Chief Executive Officer, or all or part of the Executive Directors based on the governance framework of the Legal Entity.

With regards to foundations, trusts and other Legal Arrangements, the table below shall be completed for each of the beneficial owners, i.e. settlor / founder, trustee, protector and beneficiary of the foundation, the trust or the other legal arrangement.

Full name	Capacity	Date and place of birth	Address	Nationality / (ies)	ID document number	Type of ID-document

If no person qualifies as Managing Director or Chief Executive Officer, and only a selection of the Executive Directors is provided, please explain the rationale:

For each of the above natural persons and if the Legal Entity qualifies as (i) a Passive NFE or (ii) a Professionally managed investment entity whose permanent residence is in a country that has not entered into an AEOI Agreement (i.e. a Competent Authority Agreement), please complete – for each Controlling Person – the “AEOI-CRS Controlling Persons Identification” provided in Appendix 2.



5. OTHER BOARD MEMBERS NOT QUALIFYING AS CONTROLLING PERSONS OF THE LEGAL ENTITY

This section shall not be completed if the list of the members of the Board of Directors is provided on an extract of the trade register (or an equivalent official source).

With regards to foundations, trusts and other Legal Arrangements, the table below shall be completed for the members of the Board of the trustee and the protector (if any).

Full name	Date and place of birth	Address	Nationality / (ies)

6. AUTHORIZED SIGNATORIES

This section shall be completed for the natural persons signing this form.

Full name	Capacity	Date and place of birth	Address	Nationality / (ies)	ID document number	Type of ID-document



7. SOURCE OF FUNDS

Please confirm if the account holder is acting:

- ☐ on its own behalf and not in favour of a third party; or
☐ on behalf of third party(ies); or

For an Account Holder acting on its own behalf:

You declare that the origin of the funds used for subscription is coming from:
(please tick the right choice):

- ☐ Own capital & reserves ☐ Own benefit
☐ Customers' investments or policy subscriptions ☐ Sale of an entity's asset
☐ Other (please describe):

Main country(ies) of origin of the funds invested:

For an Account Holder acting on behalf of third party(ies):

Please indicate the top 5 countries in terms of origin of the underlying investors' base:

Country	Percentage of invested amount
EEA Countr(ies)*	____.____%
	____.____%
	____.____%
	____.____%
	____.____%

* Please consolidate all EEA countries under a same line "EEA Country(ies)"

8. EXPECTED INVESTMENT AMOUNTS

By transaction:	<input checked="" type="checkbox"/> less than EUR 10 million (or equivalent)	<input type="checkbox"/> between EUR 10-100 millions (or equivalent)	<input type="checkbox"/> over EUR 100 millions (or equivalent)
Frequency:	<input type="checkbox"/> one-off	<input type="checkbox"/> at regular intervals Please specify:	<input type="checkbox"/> irregularly Please specify:



9. TAXATION

The Tax Regulations¹ currently in force require the collection (via a specific self-certification form) of additional information from the Investor, such as the tax residency, the tax classifications and the citizenship status. As an Account Holder, you are legally required to complete and provide this tax form upon the account opening.

For any questions regarding the Tax Regulations, please contact your tax adviser or the competent tax authorities.

Please fill in all the appropriate sections below and if there is a change in circumstances, we invite you to provide an updated self-certification form including such change. You declare that the information provided is to the best of your knowledge and belief, accurate and complete.

9.1. FOREIGN ACCOUNT TAX COMPLIANCE ACT (FATCA)*

For further information on this regulation (e.g. definitions), please refer to the official website: <https://www.irs.gov/Businesses/Corporations/Foreign-Account-Tax-Compliance-Act-FATCA>

If the entity is a Reporting Foreign Financial Institution incorporated in a country having signed an Intergovernmental Agreement (“IGA”) with the United States of America and is registered on the US Internal Revenue Service (IRS) website, please provide the corresponding global intermediary identification number (**GIIN code**):

* **Otherwise, please provide a:**

1. **W9 Form:** (<http://www.irs.gov/pub/irs-pdf/fw9.pdf>) if the entity has its registered office in the US or is incorporated in the US
or
2. **W8 BEN-E Form:** (<http://www.irs.gov/pub/irs-pdf/fw8bene.pdf>) if the entity does not have its registered office in the US and is not incorporated in the US

Specific FATCA provisions may be found in the fund’s prospectus.

9.2. AUTOMATIC EXCHANGE OF INFORMATION FOR THE COMMON REPORTING STANDARD (AEOI-CRS) UNDER THE ORGANISATION FOR ECONOMIC CO-OPERATION AND DEVELOPMENT (OECD)*

For further information on this regulation (e.g. the definitions), please refer to the official website: <http://www.oecd.org/tax/automatic-exchange/>

Tax residency and other information below are required for AEOI-CRS purposes. Please indicate the country in which your entity or organisation is a resident for tax purposes as well as the associated Tax Identification Number (TIN).

¹ The term “Tax regulations” refers to regulations created to enable Automatic Exchange Of Information (AEOI). It is not limited but includes the Foreign Account Tax Compliance Act (FATCA) contained in the US Hire Act 2010 and the Common Reporting Standard (CRS) approved by the Organisation for Economic Co-operation and Development (OECD) Council on 15 July 2014 for automatic exchange of financial account information.



Country of incorporation or organization:

Country of residence for tax purposes*:

Tax Identification Number (TIN)*:

If the TIN is unavailable, please explain the reason*:

If the entity has additional tax residence country(ies), please provide:

- such additional tax residence country(ies) and TIN(s) on a separate sheet (duly signed, dated with the last and first names of the authorized signatory); and
- documentary evidence (e.g. certificate of residence, tax income document) for each additional country in which the entity is resident for tax purposes.

Please tick the box corresponding to the AEOI-CRS status of the entity.

(a) Financial Institution – Professionally managed investment entity

☐

(b) Financial Institution – Other

☐

(c) Active NFE – Corporation that is publicly traded or an affiliate of a publicly traded corporation

☐

(d) Active NFE – Government entity

☐

(e) Active NFE – Category of entity other than those listed in (c) to (d)

☐

(f) Passive NFE

☐

If the Legal Entity qualifies as (i) a Passive NFE or (ii) a Professionally managed investment entity whose permanent residence is in a country that has not entered into an AEOI Agreement (i.e. a Competent Authority Agreement), please complete – for each Controlling Person – the “AEOI-CRS Controlling Persons Identification” provided in Appendix 2.

Note:

- Account opening and subscriptions into the Fund(s) are not authorised if you do not provide the above mentioned FATCA documentation (GIIN code or W8 form or W9 form) and the AEOI-CRS tax information.
- By signing this document you acknowledge that the information contained in this Identification & Verification Form (and especially in this tax form and all other required tax information such as the account balance, the amount of revenue and sale proceeds paid or credited to the Financial Account) may be reported to the competent tax authorities, if required.



10. BANK DETAILS

Please complete the bank details and ensure the bank account is in the name of the Legal Entity, as we are not allowed to process third party payments. Redemption proceeds and dividends will be paid to the account below for any currency. Edmond de Rothschild Asset Management (Luxembourg) will be unable to open your account if standard payment instructions are not provided.

BANK ACCOUNT 1 (* MANDATORY)

Bank name*

Swift/BIC (Bank Identification Code)*

Bank address*

Account holder(s)*

Please complete at least one of the following settlement currencies*:

EUR payment

Account number/IBAN:

USD payment

Account number/IBAN:

GBP payment

Account number/IBAN:

Select either: JPY ☐ CHF ☐ HKD ☐

Account number/IBAN:

BANK ACCOUNT 2 (OPTIONAL)

Bank name*

Swift/BIC (Bank Identification Code)*

Bank address*

Account holder(s)*

Please complete at least one of the following settlement currencies*:

EUR payment

Account number/IBAN:

Currency:

Account number/IBAN:

Note:

- In case the bank details change, you must notify such a change prior to any instruction relating to a redemption and/or dividend payments. Otherwise, such payments will be transferred to the former bank details.
- The bank account details inserted must be opened in the Account Holder's name. We cannot accept or execute third party payments (payments to another party other than the Investor(s) are not permitted).
- Please insert only one bank account per currency.
- For additional payment instructions, please provide banking details on a separate sheet of paper.



- Please note that duly certified banking details can be accepted in a separate sheet of paper provided that it is respecting above mentioned conditions and bank details.

11. DIVIDEND POLICY

☐ Please tick the box if you wish to have dividends reinvested, otherwise dividends will be automatically paid out to your bank account.

12. REPORTING DETAILS AND CONTACT PERSONS

As account holder, you are entitled to receive reports.

Please indicate below the contact persons that shall receive these reports:

Surname	Name	Department	Email address or fax	Contact reference
				#1
				#2
				#3
				#4
				#5

For each of the contact persons (using the above defined contact references), please indicate below the list of reports you wish to receive and the mean of communication (please tick the box where appropriate):

Contact			Upon transaction			Monthly	Daily / Monthly
Contact reference	Email or fax: Please select		Contract notes	Dividend notification	Acknowledge notification	Statement of holdings	Swift MT 535
	Email	Fax					
#1	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
#2	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
#3	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>



#4	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
#5	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please select one preferred reporting currency:

USD	EUR	GBP	JYP	GBP	HKD
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Please select one preferred language:

English	Mandarin Chinese	Spanish	French	German	Italian
<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Note: By signing this document you accept that the information referred to above shall be provided to you via unsecured email and that EDRAM and its processing agent may not be held responsible for any potential interception of this information for harmful or fraudulent use.

13. PROTECTION OF PERSONAL DATA

The Fund, in which you intend to invest, as well as EDRAM (and its processing agent, suppliers and other third parties as the case may be) have due AML / CFT diligence obligations about investors with which the Fund will enter into relationship, and respectively for which EDRAM (and its processing agent, suppliers and other third parties as the case may be) will open an account in the books of the Fund. To satisfy such obligations, they will process information, including personal data about the investor, its beneficial owners, representatives and authorized signatories as well as information about the same persons of any shareholding entity of the investor. Such information may constitute personal data under the EU Data Protective Directive and locally implementing laws uncovered by the EU Data Protective Directive.

The Fund as well as EDRAM (and its processing agent, suppliers and other third parties as the case may be) shall protect the personal data that come into their possession in the context of the investor's investments in the Fund.

When subscribing in the Fund, you acknowledge being informed of the processing of your personal data (as well as those of your beneficial owners, representatives and authorized signatories, and of those of the same persons of any of your shareholding entity).

The personal data collected in this form is processed by EDRAM as:

- **Processor (or sub-processor)** within the meaning of GDPR: when EDRAM, acting as central administration, processes this personal data (ultimately) on behalf of the Fund in which the investor intends to invest. Further information on personal data processing in this circumstance is provided in the Fund's personal data protection policy/notice;



and/or

- **Controller** within the meaning of GDPR: when EDRAM processes this personal data on its own behalf in the context of its activities. The conditions under which this data is processed by EDRAM as controller are detailed in its personal data protection charter which is available in several languages on the website www.edmond-de-rothschild.eu in the «your personal data» section. Further information thereon may also be obtained at the following email address: DPO-eu@edr.com. The investors are kindly requested to transmit this charter to any relevant natural person whose personal data could be processed by EDRAM as controller, such as (where applicable) their board members, representatives, signatories, employees, officers, attorneys, contact persons, agents, service providers, controlling persons, beneficial owners and/or any other related persons.

14. REPRESENTATION

You declare and represent to EDRAM, that:

- You have read and understood the terms of the latest prospectus of the Fund and you confirm that you meet the Fund's eligibility requirements; This representation applies for this and any subsequent investment by you in the Fund;
- You have read and understood the Terms and Conditions disclosed in this form and you agree to these Terms and Conditions;
- This Identification & Verification Form has been filled in properly and all information provided is true and accurate;
- You understand and acknowledge that EDRAM compares signatures with the specimens held at its offices without having to proceed with a more detailed investigation. You confirm that, with the exception of legally binding regulations, EDRAM's obligations shall be limited to an obligation of means and EDRAM will only be liable in the case of gross misconduct. Once the signature complies at first glance with the specimen held at EDRAM offices, EDRAM shall not be held responsible for any direct or indirect losses, damages, costs, fees or any other liabilities caused by the fact that the signature on the instructions or declarations given to it is fraudulent. EDRAM can rely on the signature below without having to proceed with a more detailed investigation and decline all responsibility for any direct or indirect losses, damages, costs, fees or any other liabilities that could result from the absence of any legitimization or any undetected forgery;
- You are aware that EDRAM assumes no liability for failure to process an order as a result of incomplete or inaccurate information presented by you in this Identification & Verification Form;
- You understand and acknowledge that EDRAM shall not be liable for any losses, damages, costs, fees or any other liabilities which may be directly or indirectly caused by the lack of authenticity or validity of the authorisations which refer to you or third parties with the legal capacity to act on your behalf;
- You understand and acknowledge that EDRAM reserves the right to refuse to process an instruction from any person whose identity and permissions have not been sufficiently established in our eyes;
- You acknowledge and confirm that EDRAM shall not be responsible for any direct or indirect losses, damages, costs, fees or any other liabilities caused due to a change of your capacity or the capacity of third party's authorised to act on your behalf, unless EDRAM has received conclusive and documented prior reasonable written notice of such change;
- You acknowledge and confirm that you shall compensate and reimburse EDRAM for all complaints, claims, legal action, fees, expenses, damages, losses or other sums paid or



responsibilities incurred by EDRAM resulting from the proper execution by it of an instruction on your part;

- You will immediately inform EDRAM of any change in the information provided in this Identification & Verification Form;
- You are duly authorised to sign this Identification & Verification Form;
- You authorise EDRAM to share your information with its delegate(s) and/or sub-contractor(s) and with any entity in the Edmond de Rothschild group;
- The source of funds declared by you in this Identification & Verification Form does not derive from illegal activities as described under the recommendations issued by the Financial Action Task Force on Money Laundering (FATF);
- The assets/funds invested in the Fund do not or shall not directly or indirectly come from any unlawful or criminal activity and that the assets/funds invested in the Fund shall not be used in connection with money-laundering or terrorism financing purposes;
- The investment in the Fund is not originating from a tax fraud and shall not serve any purpose of tax fraud;
- You are aware of the tax obligations applying to you pursuant to your holding of shares / units in the Fund, and you will comply with the tax declaration obligations to the competent tax authority as imposed to you in your country of tax residency;
- You are aware that, within the context of your subscription in the Fund, your telephone conversations with EDRAM representatives' may be recorded;
- You are aware of your responsibility to comply with all applicable laws and regulations. It is therefore your responsibility to seek any assistance from qualified independent advisors as necessary;
- Any and all disputes resulting from this form are exclusively governed by applicable Luxembourg laws and shall exclusively be referred to the Luxembourg competent court.

1st authorized signatory*

Date:

Place:

First name:

Last name:

Signature:

2nd authorized signatory* (if a second signatory)

Date:

Place:

First name:

Last name:

Signature:



TERMS AND CONDITIONS

Mandatory documentation

As required in the prospectus of the Fund(s) and according to local applicable laws, particularly relating to the prevention of money laundering, the Application Form must be accompanied by documents that will allow EDRAM/CACEIS to identify the account holder and, if applicable, all underlying beneficial owners of the investment to the extent permitted by laws.

Subsequent subscriptions of shares/units within the Fund(s) shall not require again the investor to provide EDRAM/CACEIS with the identification documents to the extent that the investor's situation has remained unchanged since the previous subscriptions.

Notwithstanding the foregoing, the account holder may be requested to provide additional or updated identification documents from time to time pursuant to on-going due diligence requirements under relevant laws and regulations.

In case of delay or failure by the account holder to provide the required documents, the application for shares or units subscription may not be accepted and in case of a shares or units redemption request, the payment of the redemption proceeds and/or dividends may not be processed. Neither the Fund(s) nor EDRAM/CACEIS shall have any liability for delays or failure to process orders into the Fund(s) as a result of the account holder providing incomplete documentation.

Investment Information

This Application Form is subject to the provisions set out in the Fund's prospectus.

Orders received after the cut-off time specified in the prospectus will be processed on the following NAV calculation date, subject to the provisions of the CSSF (Commission de Surveillance du Secteur Financier) circular 04/146 or any amendments thereto.

For the French domiciled funds, the cut-off time is one hour less than the official fund cut-off time for orders received by fax and 30 minutes less for orders received by swift.

Incomplete or illegible orders will be accepted only after such orders have been received with complete and legible information by CACEIS. No money will be transferred to the Fund unless the order is accepted.

Data protection

The Fund, and, where applicable, EDRAM/CACEIS have taken all necessary steps, to ensure compliance with the EU Regulation 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data and repealing Directive 95/46/EC and with any implementing legislation applicable to them (together, the "Data Protection Law") in respect of personal data processed by it/them in connection with investments made into the Fund.

Personal data shall have the meaning given in the Data Protection Law and includes any information relating to an identifiable individual, such as the investor's name, address, invested amount, the investor's individual representatives' names as well as the name of the ultimate beneficial owner, where applicable, and such investor's bank account details (the "Personal Data").

The processing includes (non-exclusively) actions required in relation to: information about processing of your Personal Data and, as the case may be, consent mechanisms; procedures for responding to requests to exercise individual rights; contractual arrangements with suppliers



and other third parties; security measures; arrangements for overseas data transfers and record keeping and reporting policies and procedures.

Recording of telephone conversations

Whoever the party initiating the call, the Investor accepts that EDRAM/CACEIS may record on magnetic tape or on any other medium all or part of any telephone conversations with the Investor or a proxy-holder thereof. The Investor acknowledges that such recordings shall be validly binding upon it and on any third party, even if it was not specifically made aware to the Investor or its representatives that the conversation was being recorded. Recordings will be kept for a maximum period of 5 (five) years and may be produced in court. They shall have the same evidential value as written original documents. The recordings shall be used in strict compliance with any applicable banking secrecy and individual privacy laws.

Prevention of Money Laundering and fight of terrorist financing

All Applicants understand that due to the changing nature of laws and regulations and the possible extensions of applicable rules, EDRAM/CACEIS may update and amend their procedures as might be required from time to time to comply with such amendments.

In compliance with applicable anti-money laundering laws and regulations, the EDRAM/CACEIS may require further information to carry out the required identification of the Applicants or an existing investor before the application can be processed or the redemption proceeds paid out; and the documentation to be renewed in accordance with applicable regulation and market practice.

Outsourcing and delegation

In order to improve the efficiency and quality of their services, the EDRAM and the Depositary Bank may sub-contract/outsource certain of their functions/duties to service providers (located in jurisdictions inside or outside of the EEA, such as Switzerland) which, in view of functions/duties to be sub-contracted/outsources, have to be qualified and competent for performing them (the "Service Providers"). EDRAM's and the Depositary Bank's liability shall not be affected by such sub-contracting/outourcing arrangements. In this context, EDRAM and the Depositary Bank may be required to disclose and transfer to the Service Providers personal and confidential information about or related to the Investors, such as (where applicable according to the activities of EDRAM and the Depositary Bank) identification data and/or contact details (e.g. name, address, gender, marital status, date and/or place of birth, country of residence, etc.), tax identification number and/or tax status, banking details (including the account number and/or the account balance), type of relationship, title or function, profession, curriculum vitae, knowledge, experience, skills, wealth, risk rating, invested amount and/or origin of the funds, transaction information, contractual or other information/documentation, etc., (all together hereinafter referred to as the "Confidential Information"). The Investor's attention is particularly drawn to the fact that Confidential Information may be transferred to Service Providers established in countries where professional secrecy or confidentiality obligations are not equivalent to the professional secrecy/confidentiality obligations imposed by Luxembourg law. In any event, the Service Providers are either subject to a professional secrecy obligation by application of law or contractually bound to comply with confidentiality rules. Further specific details regarding the sub-contracted/outsources services, the type of Confidential Information transmitted in this context and the Service Providers (including their country of establishment) may be obtained upon written request to the Fund, EDRAM or the Depositary Bank.



General definitions

“Beneficial Owner” As per the 4th AML directive (EU 2015/849) of 20 May 2015, beneficial owner means any natural person(s) who ultimately owns or controls the customer and/or the natural person(s) on whose behalf a transaction or activity is being conducted and includes at least:

(a) in the case of corporate entities:

(i) the natural person(s) who ultimately owns or controls a legal entity through direct or indirect ownership of a sufficient percentage of the shares or voting rights or ownership interest in that entity, including through bearer shareholdings, or through control via other means, other than a company listed on a regulated market that is subject to disclosure requirements consistent with Union law or subject to equivalent international standards which ensure adequate transparency of ownership information. A shareholding of 25 % plus one share or an ownership interest of more than 25 % in the customer held by a natural person shall be an indication of direct ownership. A shareholding of 25 % plus one share or an ownership interest of more than 25 % in the customer held by a corporate entity, which is under the control of a natural person(s), or by multiple corporate entities, which are under the control of the same natural person(s), shall be an indication of indirect ownership. This applies without prejudice to the right of Member States to decide that a lower percentage may be an indication of ownership or control. Control through other means may be determined, inter alia, in accordance with the criteria in Article 22(1) to (5) of Directive 2013/34/EU of the European Parliament and of the Council (3);

(ii) if, after having exhausted all possible means and provided there are no grounds for suspicion, no person under point (i) is identified, or if there is any doubt that the person(s) identified are the beneficial owner(s), the natural person(s) who hold the position of senior managing official(s), the obliged entities shall keep records of the actions taken in order to identify the beneficial ownership under point (i) and this point;

(b) In the case of trusts:

(i) the settlor;

(ii) the trustee(s);

(iii) the protector, if any;

(iv) the beneficiaries, or where the individuals benefiting from the legal arrangement or entity have yet to be determined, the class of persons in whose main interest the legal arrangement or entity is set up or operates; (v) any other natural person exercising ultimate control over the trust by means of direct or indirect ownership or by other means;

(c) in the case of legal entities such as foundations, and legal arrangements similar to trusts, the natural person(s) holding equivalent or similar positions to those referred to in point (b).

“Constitutive Documents” means the Articles of Incorporation or Management Regulations, as the case may be, of a Fund as amended from time to time.

“EEA” means the European Economic Area.

“FATF” means the Financial Action Task Force.

“Fund” or “Funds” means the collective investment schemes listed in the Application Form.

“Institutional Investor” means any Investor that is not a natural person and for which the business purpose requires the management of substantial assets. The main characteristic of any institutional investor is that its business purpose requires the management of substantial assets. An institutional investor may be an Insurance company, social security institution, credit institution, UCI (Undertaking Collective Investment), local authority, unregulated investment



company (e.g. holding company) under certain conditions, commercial company with substantial assets under management, pension fund or other professionals of the financial sector. Credit institutions and other professionals of the financial sector investing in institutional funds in their own name but on behalf of another party on the basis of a discretionary management relationship are also considered as institutional investors, even if the third party on behalf of which the investment is undertaken is not itself an institutional investor.

“Investor” means the entity or organisation subscribing for Shares including, where applicable, an Intermediary who is authorised to subscribe to Shares on behalf of its clients.

“Intermediary” means the entity or person advising and dealing on behalf of the Investor.

“Fund” means an investment fund vehicle.

“Prospectus” means the current prospectus issued by or in respect of each Fund, whether supplemented or periodically amended.

“Shares” means shares or units of a Fund.

“Terms and Conditions” means these terms and conditions that form part of the Application Form, whether supplemented or periodically amended.



APPENDICES

APPENDIX 1:

List of required documents, per typology of customer

- APPENDIX 1.1. FINANCIAL INSTITUTIONS
- APPENDIX 1.2. INVESTMENT FUNDS
- APPENDIX 1.3. pension vehicles
- APPENDIX 1.4. TRUSTS & FOUNDATIONS
- APPENDIX 1.5. LIMITED PARTNERSHIPS
- APPENDIX 1.6. LISTED CORPORATES
- APPENDIX 1.7. CORPORATES
- APPENDIX 1.8. ASSOCIATION / NON-PROFIT ORGANIZATION

APPENDIX 2:

AEOI-CRS Identification Form for Controlling Persons

APPENDIX 3:

Profiling Form for Shareholders / Settlers qualifying as Ultimate Beneficial Owners

APPENDIX 4:

AML / CFT Comfort / Representation Letter



APPENDIX 1 – LIST OF REQUIRED DOCUMENTS

For compliance purposes, in addition to the data provided in this Form, you are required to provide Edmond de Rothschild Asset Management (Luxembourg) with the necessary documentation to verify the identification data.

In compliance with applicable anti-money laundering laws and regulations, Edmond de Rothschild Asset Management (Luxembourg) will analyse all information and documentation provided. Based on this analysis, Edmond de Rothschild Asset Management (Luxembourg) may require further information or documentation to complete the required identification and verification of entity of the Applicant.

APPENDIX 1.1. FINANCIAL INSTITUTIONS

DOCUMENTATION REQUIRED:

A. To verify **the identity, the object and the existence** of the financial institution, a copy (or online extract) of the following documents must be provided:

EITHER:

- certificate of incorporation (or equivalent e.g. extract of trade register); and
- articles of association or equivalent constitutive document(s) (or extracts thereof);
 - ⇒ confirming the following information:
 - company name;
 - date and country of incorporation/registration;
 - official identification number with the trade register or the relevant authority;
 - registered office address;
 - list of directors.

OR:

- (a print-out from the relevant regulator's or stock exchange's website (or, in the latter case, from a data vendor's interface) will suffice); confirming the following information:
 - company name;
 - date and country of incorporation/registration;
 - official identification number with the supervisory authority;
 - registered office address.

B. To verify **the ownership structure** of the financial institution, a copy of one of the following documents (dated and signed) must be provided:

- register of shareholder(s) (dated and signed) with percentage holdings;
- corporate/group structure chart (dated and signed) with percentage holdings;
- financial statements, if detailing the ownership structure and the disclosure of the ultimate beneficial owner(s).

* If more than 75% of the shares of the Legal Entity are admitted to trading on a regulated market, you may ignore this point and provide documents requested under appendix 1.6.B.

AND:

- if the financial institution is established in a country where a Register of Beneficial Owner is implemented, an extract from the Beneficial Ownership Register.



- C. To ascertain **the authority** of the signatories **to engage** the financial institution when executing (i) the Account Opening Form, (ii) this Identification and Verification Form and (iii) any subsequent written instructions:
- copy of the List of Authorised Signatories, or any restricted list of signatories deemed to represent the financial institution in its professional relationship with the Fund, together with the granted powers.

If the financial institution is investing on behalf of (a) **3rd party(ies)**, the identity of which may not be provided to us:

- D. To ascertain the **KYC due diligence** performed by the financial institution on the 3rd party(ies):
- proof of regulation (if not already provided above);
 - original AML Comfort/Representation Letter, duly signed by the MLRO of the financial institution (or its representative);
 - original version, copy, or only extract of a completed Wolfsberg Questionnaire, duly signed by the MLRO of the financial institution (or its representative).
 - * If the financial institution is not domiciled or regulated in an equivalent country, the above may be provided by the regulated Mother Company covering for its subsidiary.



APPENDIX 1.2. INVESTMENT FUNDS

PLEASE COMPLETE AS APPROPRIATE:

1.2.1. Investment funds as Legal Entities; or

1.2.2. Investment funds in contractual form (without legal personality)

1.2.1. INVESTMENT FUNDS AS LEGAL ENTITIES:

DOCUMENTATION REQUIRED:

A. To verify **the identity, the object and the existence** of the investment fund, a copy (or online extract) of the following documents must be provided:

- Either a certificate of incorporation (or equivalent e.g. extract of trade register);
- Or a proof of regulation (if applicable) (a print-out from the relevant website will suffice);
 - ⇒ confirming the following information:
 - company name;
 - date and country of incorporation/registration;
 - official identification number with the supervisory authority;
 - registered office address;

AND:

- articles of association, prospectus or private placement memorandum (or equivalent constitutive document(s));
 - ⇒ confirming, in addition, the following information:
 - nature of the fund (open-ended or closed-end*)
- * please note that closed-end funds shall be categorised as Corporates. Please move to the appendices 1.6 or 1.7;
- list of directors (if not provided above);
 - entity covering for AML / CFT obligations.

AND :

- proof of regulation of the Management Company

B. To identify and verify **the ownership structure** of the investment fund, one of both set of documents must be provided by the entity in charge of AML / CFT for the investment fund, depending whether any of the shareholders in the investment fund owns more than 25% +1 of the shares:

EITHER:

- declaration that no shareholder in the investment fund owns more than 25% + 1 of the shares (such declaration may be included in the AML Comfort/Representation Letter requested under D.);

OR:

- declaration disclosing the identify (name, surname, date of birth, place of birth and residential address) of the shareholder(s) owning more than 25% + 1 of the shares;
- upon request, one of the following documents must be provided in order to verify the existence and identity of the above mentioned shareholder(s):



- copy of the register of shareholder(s) (dated and signed) with percentage holdings;
 - copy of the corporate/structure chart (dated and signed) of the investment fund, with percentage holdings; or
 - letter by the shareholder(s) confirming the number of shares held.
- C. To ascertain **the authority** of the signatories **to engage** the investment fund when executing (i) the Account Opening Form, (ii) this Identification and Verification Form and (iii) any subsequent written instructions:
- copy of the List of Authorised Signatories, or any restricted list of signatories deemed to represent the investment fund in its professional relationship with the Fund, together with the granted powers.

IF THE INVESTMENT FUND IS REPRESENTED BY AN INVESTMENT/ASSET MANAGER, WITH NAME IN OUR REGISTER, THEN:

- **this section C does not apply;**
 - **please complete the form disclosing “Customer/legal Entity = Investment Manager/Asset Manager “ and “Investment fund = Investment Fund”;**
 - **please provide as well documentation as per appendix “Financial Institutions” for the Investment Manager / Asset Manager (excluding section B). Documentation as per section D of the appendix for “Financial Institutions” does not need to be provided; section D (hereafter) of the appendix for “Investment Funds as Legal Entities” shall be provided.**
- D. To ascertain the KYC due diligence performed by the entity in charge of the AML / CFT's KYC process on the shareholders / investors in the investment fund:
- D.1. Please provide for such entity:
- proof of regulation (if not already provided above);
 - original AML Comfort / Representation Letter, covering the investment fund and duly signed by the MLRO of the entity (or its representative);
 - original version, copy, or only extract of a completed Wolfsberg Questionnaire, duly signed by the MLRO of the entity (or its representative).
- D.2. Please provide for the investment fund:
- if the investment fund is established in a country where a Register of Beneficial Owner is implemented, an extract from the Beneficial Ownership Register.

1.2.2. INVESTMENT FUNDS IN CONTRACTUAL FORM (WITHOUT LEGAL PERSONALITY):

DOCUMENTATION REQUIRED:

- A. To verify **the identity, the object and the existence** of the investment fund, a copy (or online extract) of the following document must be provided:
- Management regulation (or the equivalent)
 - ⇒ confirming the name of the fund instrument;
 - ⇒ establishing the link between the investment fund and its Investment/Asset Manager opening the account in our register.
 - ⇒ entity covering for AML / CFT obligations.

AND:



- proof of regulation of the Management Company
- B. To identify and verify the ownership structure of the investment fund, one of both set of documents must be provided by the entity in charge of AML / CFT for the investment fund, depending whether any of the shareholders in the investment fund owns more than 25% +1 of the units:

EITHER:

- declaration that no unitholder in the investment fund owns more than 25% + 1 of the units (such declaration may be included in the AML Comfort/Representation Letter requested under D.);

OR:

- declaration disclosing the identify (name, surname, date of birth, place of birth and residential address) of the unitholder(s) owning more than 25% + 1 of the units;
- upon request, one of the following documents must be provided in order to verify the existence and identity of the above mentioned shareholder(s):
 - copy of the register of unitholder(s) (dated and signed) with percentage holdings;
 - copy of the structure chart of the investment fund (dated and signed), with percentage holdings; or
 - letter by the unitholder(s) confirming the number of units held.

IF THE INVESTMENT FUND IS REPRESENTED BY AN INVESTMENT/ASSET MANAGER, WITH NAME IN OUR REGISTER, THEN:

- **please complete the form disclosing “Customer / Legal Entity = name of the Investment / Asset Manager” and “Instrument = name of the Investment fund”;**
- **please provide as well documentation as per appendix “Financial Institutions” for the Investment Manager / Asset Manager (excluding section B). Documentation as per section D of the appendix for “Financial Institutions” does not need to be provided; section C (hereafter) of the appendix for “Investment Funds in contractual form” shall be provided.**

- C. To ascertain **the KYC due diligence** performed by the entity in charge of the AML / CFT's KYC process on the shareholders / investors in the investment fund:

C.1. Please provide for such entity:

- proof of regulation (if not already provided above);
- original AML Comfort/Representation Letter, covering the investment fund and duly signed by the MLRO of the entity (or its representative);
- original version, copy, or only extract of a completed Wolfsberg Questionnaire, duly signed by the MLRO of the entity (or its representative).

C.2. Please provide for the investment fund:

- if the investment fund is established in a country where a Register of Beneficial Owner is implemented, an extract from the Beneficial Ownership Register.



APPENDIX 1.3. PENSION VEHICLES

PLEASE COMPLETE AS APPROPRIATE:

1.3.1. Pension funds as Legal Entities; or

1.3.2. Pension schemes in contractual form (without legal personality)

1.3.1. PENSION FUNDS AS LEGAL ENTITIES:

DOCUMENTATION REQUIRED:

- A. To verify **the identity, the object and the existence** of the pension fund, a copy (or online extract) of the following documents must be provided:
- certificate of incorporation (or equivalent) or proof of registration with any authority (e.g. EIOPA)
 - ⇒ confirming the following information:
 - company name;
 - date and country of incorporation/registration;
 - official identification number with the trade register or the relevant authority;
 - registered office address;
 - list of directors;
 - the name of the beneficial owners (sponsor / settlor, manager / administrator / trustee, beneficiaries).
 - articles of association, trust deed (with pension rules) or equivalent constitutive document(s) (or extracts thereof), and
 - if the pension fund is established in a country where a Register of Beneficial Owner is implemented, an extract from the Beneficial Ownership Register.
 - latest audited financial statements (annual report)
 - ⇒ disclosing the identity of the settlor, trustee / manager / administrator, beneficiaries; and
 - ⇒ justifying that:
 - the scheme provides retirement benefits for employees, and
 - contributions are made by an employer / sponsor or by way of a deduction from wages, and
 - the scheme rules do not permit the assignment of members' interests under the scheme except after the death of the members.
- B. To verify **the identity of the beneficial owners** of the pension fund, a copy (or online extract) of the following documents must be provided:
- For the settlor/sponsor/employer: Unless information about the activity of the settlor/ sponsor/employer are available on public sources, a copy (or online extract) of the following documents must be provided:
 - certificate of incorporation (or equivalent);
 - articles of association or equivalent constitutive document(s) (or extracts thereof); and
 - last financial statements (annual report) of the entity.



- For the manager / administrator of the scheme / trustee (assuming it is a legal entity): a copy (or online extract) of the following documents must be provided:
 - certificate of incorporation (or equivalent); and
 - articles of association or equivalent constitutive document(s) (or extracts thereof);
- ⇒ All the above confirming the following information about the beneficial owners:
 - company name;
 - date and country of incorporation/registration;
 - official identification number with the trade register or the relevant authority;
 - registered office address;
 - activity/business nature of the sponsor.

C. To ascertain the authority of the signatories to engage the pension fund when executing (i) the Account Opening Form, (ii) this Identification and Verification Form and (iii) any subsequent written instructions:

- copy of the List of Authorised Signatories, or any restricted list of signatories deemed to represent the pension fund in its professional relationship with the Fund, together with the granted powers.

IF THE PENSION FUND IS REPRESENTED BY AN INVESTMENT/ASSET MANAGER OR A TRUSTEE, WITH NAME IN OUR REGISTER, THEN:

- **this section C does not apply;**
- **please complete the form disclosing “Customer/Legal Entity = Investment Manager/ Asset Manager or Trustee” and “Instrument = Pension fund”;**
- **please provide documentation as per sections “Financial Institutions” or “Corporates” in case of an unregulated trustee. Documentation as per section D of the form for “Financial Institutions” does not need to be provided.**

D. If the Pension Scheme is not only for employees of a company: To ascertain the KYC due diligence performed by the entity in charge of the AML / CFT’s KYC process on the beneficiaries:

- proof of regulation (if not already provided above);
- original AML Comfort / Representation Letter, covering the investment fund and duly signed by the MLRO of the entity (or its representative).

1.3.2. PENSION SCHEMES IN CONTRACTUAL FORM (WITHOUT LEGAL PERSONALITY):

DOCUMENTATION REQUIRED:

A. To verify **the identity, the object and the existence** of the pension fund, a copy (or online extract) of the following documents must be provided:

- proof of registration with any authority (e.g. EIOPA)
 - ⇒ confirming the following information:
 - instrument/scheme name;
 - date and country of registration;
 - official identification number with the relevant authority;



- trust deed (with pension rules) or equivalent constitutive document(s) (or extracts thereof)
 - ⇒ disclosing the identity of the settlor, trustee / manager / administrator, beneficiaries; and
 - ⇒ justifying that:
 - the scheme provides retirement benefits for employees, and
 - contributions are made by an employer / sponsor or by way of a deduction from wages, and
 - the scheme rules do not permit the assignment of members' interests under the scheme except after the death of the member.
- B. To verify the identity of the beneficial owners of the pension scheme, a copy (or online extract) of the following documents must be provided:
- For the settlor / sponsor / employer: Unless information about the activity of the settlor / sponsor / employer are available on public sources, a copy (or online extract) of the following documents must be provided:
 - certificate of incorporation (or equivalent); and
 - articles of association or equivalent constitutive document (or extracts thereof); and
 - the last financial statements (annual report) of the entity;
 - For the manager / administrator of the scheme / trustee (assuming it is a legal entity): a copy (or online extract) of the following documents must be provided:
 - certificate of incorporation (or equivalent) or proof of regulation (if applicable); and
 - articles of association or equivalent constitutive document (or extracts thereof);
 - ⇒ All the above confirming the following information about the beneficial owners:
 - company name;
 - date and country of incorporation/registration;
 - official identification number with the trade register or the relevant authority;
 - registered office address;
 - activity / business nature of the sponsor.

AS THE PENSION SCHEME IS REPRESENTED BY AN INVESTMENT/ASSET MANAGER, WITH NAME IN OUR REGISTER, THEN:

- **please complete the form disclosing “Customer/Legal Entity = Investment Manager/ Asset Manager or Trustee” and “Instrument = Pension scheme”;**
- **please provide documentation as per sections “Financial Institutions” or “Corporates” in case of an unregulated trustee. Documentation as per section D of the form for “Financial Institutions” does not need to be provided.**



APPENDIX 1.4. TRUSTS & FOUNDATIONS

DOCUMENTATION REQUIRED:

A. To verify **the identity, the object and the existence** of the trust or foundation, a copy (or online extract) of the following documents must be provided:

- certificate of incorporation/registration (or equivalent); and
- articles of association, trust deed or equivalent constitutive document(s) (or extracts thereof);
 - ⇒ confirming the following information:
 - company/instrument name;
 - date and country of incorporation/registration;
 - official identification number with the trade register or the relevant authority;
 - registered office address (for legal entities);
 - list of directors (for legal entities);
 - the name of the beneficial owners (settlor, trustee, protector, beneficiaries from the trust / foundation);
- last financial statements (annual report).

B. To verify **the identity of the beneficial owners** of the trust or foundation, the following documents must be provided:

- For the directors (if any) and beneficial owners of the trust / foundation (or trustee) as provided in sections 3 to 6 of this form:
 - a copy of an identity document (passport, identity card, driving license,...);
 - a copy of a recent utility bill (not older than 6 months).

- For the settlor (or founder):

EITHER The settlor is a legal entity:

Unless information about the activity of the settlor / sponsor is available on public sources, a copy (or online extract) of the following documents must be provided:

- certificate of incorporation (or equivalent);
- articles of association or equivalent constitutive document(s) (or extracts thereof); and
- a copy of the last audited financial statements (annual report) of the entity (if applicable);

OR The settlor is a natural person AND for each of the Shareholders qualifying as Ultimate Beneficial Owners of the settlor if the latter is not submitted to annual audit):

- a copy of an identity document (passport, identity card, driving license,...);
- a copy of a recent utility bill (not older than 6 months);
- the Private Person's Profile Form (Appendix 3).

- For the trustee and for the protector (if any): a copy (or online extract) of the following documents must be provided:

EITHER The trustee / protector is a legal entity:



A copy (or online extract) of the following documents must be provided:

- certificate of incorporation (or equivalent); and
- memorandum and articles of association or equivalent constitutive document (or extracts thereof);

OR The trustee / protector is a natural person (if not already provided above):

- A copy of an identity document (passport, identity card, driving license,...);
- A copy of a recent utility bill (not older than 6 months).

- For the economic beneficiaries:

IF the economic beneficiaries are natural persons that may be named at the moment of completion of this Identification & Verification Form, for each of them:

- a copy of an identity document (passport, identity card, driving license,...);
- a copy of a recent utility bill (not older than 6 months);

OR IF the economic beneficiaries are natural persons that may not be named at the moment of completion of this Identification & Verification Form (e.g. Discretionary Trust):

- a copy of a constitutive document defining the class of the persons in whose main interest the legal arrangement is set up or operates;

OR IF where the trust or foundation has a charitable purpose:

- a copy of a constitutive document, of an official document or any other reliable document enabling to determine the name of the charity (if applicable) or the charity type / purpose.

⇒ All the above confirming at least the following information about the beneficial owners:

For legal entities:

- company name;
- date and country of incorporation/registration;
- official identification number with the trade register or the relevant authority;
- registered office address;
- economic activity of the settlor (if applicable);
- purpose of the trust.

For natural persons:

- name and surname;
- date and place of birth;
- official identification number;
- address of residence;
- source of wealth of the settlor (if applicable).



- C. To ascertain **the authority** of the signatories **to engage** the trust / foundation / or when executing (i) the Account Opening Form, (ii) this Identification and Verification Form and (iii) any subsequent written instructions:
- copy of the List of Authorised Signatories, or any restricted list of signatories deemed to represent the trust / foundation / or trustee in its professional relationship with the Fund, together with the granted powers;
 - copy of an identity document of the authorised signatories, and upon request of a utility bill.

IF THE TRUST/FOUNDATION IS REPRESENTED BY A TRUSTEE, WITH NAME IN OUR REGISTER, THEN:

- **this section C does not apply;**
- **please complete the form disclosing “Customer/Legal Entity = Trustee “ and “Instrument = Trust/Foundation”;**
- **please provide documentation as per sections “Financial Institutions” or “Corporates” depending whether the trustee is regulated or not. Documentation as per section D of the form for “Financial Institutions” does not need to be provided.**



APPENDIX 1.5. LIMITED PARTNERSHIPS (other than investment funds)

DOCUMENTATION REQUIRED:

- A. To verify **the identity, the object and the existence** of the limited partnership, a copy (or online extract) of the following documents must be provided:
- certificate of formation/registration (or equivalent); and
 - limited partnership agreement or equivalent constitutive document(s) (or extracts thereof);
 - ⇒ confirming the following information:
 - partnership name;
 - date and country of registration;
 - official identification number with the relevant authority;
 - the name and mandate of the general partner;
 - entity covering for AML / CFT obligations;
 - if the limited partnership is established in a country where a Register of Beneficial Owner is implemented, an extract from the Beneficial Ownership Register
 - last financial statements (annual report).
- B. To verify **the identity of the beneficial owners and ownership structure** of the limited partnership, the following documents must be provided:
- For the **general partner**, a copy (or online extract) of the following documents must be provided:
 - certificate of incorporation (or equivalent);
 - articles of association or equivalent constitutive document(s) (or extracts thereof); and
 - a list of directors (if not provided in the certificate of incorporation).
 - For the **limited partners**, one of both set of documents must be provided, depending whether any of the shareholders in the investment fund owns more than 25% + 1 of the units:

EITHER:

 - declaration that no unitholder in the investment fund owns more than 25% + 1 of the units; and

OR:

 - declaration disclosing the identify (name, surname, date of birth, place of birth and residential address) of the unitholder(s) owning more than 25% + 1 of the units;
 - upon request, one of the following documents must be provided in order to verify the existence and identity of the above mentioned shareholder(s):
 - copy of the limited partnership register, with percentage holdings by limited partner;
 - copy of the structure chart of the limited partnership, with percentage holdings; or
 - letter by the limited partner(s) confirming the number of units held;
 - identification form and/or verification documents for the limited partners.
 - For the **economic beneficiaries** (natural persons): if the economic beneficiaries may be named at the moment of completion of this Identification & Verification Form, a copy of



an identity document (passport, identity card, driving license...) and of a utility bill (no older than 6 months);

- ⇒ All the above confirming the following information about the beneficial owners:
- company name;
 - date and country of incorporation/registration;
 - official identification number with the trade register or the relevant authority;
 - registered office address.

- C. To ascertain **the authority** of the signatories **to engage** the investment fund when executing (i) the Account Opening Form, (ii) this Identification and Verification Form and (iii) any subsequent written instructions:
- copy of the List of Authorised Signatories, or any restricted list of signatories deemed to represent the investment fund in its professional relationship with the Fund, together with the granted powers.

AS THE LIMITED PARTNERSHIP IS REPRESENTED BY A GENERAL PARTNER, WITH NAME IN OUR REGISTER, THEN:

- **please complete the form disclosing “Customer/Legal Entity = General Partner” and “Instrument = Limited Partnership”;**
 - **please provide documentation as per sections “Financial Institutions” or “Corporates” depending whether the General Partner is regulated or not. Documentation as per section D of the form for “Financial Institutions” does not need to be provided.**
- D. To ascertain the **KYC due diligence** performed by the entity in charge of the AML / CFT’s KYC process on the limited partners, please provide for such entity:
- proof of regulation (if not already provided above);
 - original AML Comfort / Representation Letter, covering the investment fund and duly signed by the MLRO of the entity (or its representative);
 - original version, copy, or only extract of a completed Wolfsberg Questionnaire, duly signed by the MLRO of the entity (or its representative);
 - list of signatories or passports of the signatories of the above documents.



APPENDIX 1.6. LISTED CORPORATES

DOCUMENTATION REQUIRED:

- A. To verify **the identity, the object and the listing** of the corporate, a copy (or online extract) of the following documents must be provided:
- Evidence of listing on a regulated market, justifying the floating rate.
- B. To verify **the ownership structure** of the listed corporate, the following documents must be provided:
- If the floating rate is = or > 75%, no further documentation required.
 - If the floating rate < 75%, a copy of a corporate/group structure chart with percentage holdings.

Note: If the floating rate is = or > 75%, C. and D. below do not apply.

- C. To verify the **identity of any “shareholding company”** holding more than 25% of the shares of the corporate (if any) or of another shareholding company, a copy (or online extract) of the following documents must be provided:
- certificate of incorporation (or equivalent e.g. extract of trade register); and
⇒ confirming the following information:
 - company name;
 - date and country of incorporation/registration;
 - official identification number with the trade register or the relevant authority;
 - registered office address;
 - list of directors.
- D. To verify the **identity of any ultimate beneficial owner** (natural person) holding directly more than 25% of the shares of the corporate (if any) or of a shareholding company, the following must be provided:
- a copy of an identity document (passport, identity card, driving license...) and of a utility bill.
 - Upon request:
 - the Private Person's Profile Form (Appendix 3);
- E. To ascertain **the authority** of the signatories **to engage** the corporate when executing (i) the Account Opening Form, (ii) this Identification and Verification Form and (iii) any subsequent written instructions:
- copy of the List of Authorised Signatories, or any restricted list of signatories deemed to represent the corporate in its professional relationship with the Fund, together with the granted powers.



APPENDIX 1.7. CORPORATES (OTHER THAN LISTED CORPORATES)

DOCUMENTATION REQUIRED:

- A. To verify **the identity, the object and the existence** of the corporate, a copy (or online extract) of the following documents must be provided:
- certificate of incorporation (or equivalent e.g. extract of trade register); and
 - articles of association or equivalent constitutive document(s) (or extracts thereof);
 - ⇒ confirming the following information:
 - company name;
 - date and country of incorporation/registration;
 - official identification number with the trade register or the relevant authority;
 - registered office address;
 - list of directors;
 - last audited financial statements (annual report).
- B. To verify **the ownership structure** of the financial institution, a copy of one of the following documents must be provided:
- corporate / group structure chart with percentage holdings;
and
 - register of shareholder(s) with percentage holdings; or
 - last audited financial statements or extract from the trade register, if detailing the ownership structure and the disclosure of the ultimate beneficial owner(s).
- C. To verify the **identity of any “shareholding company”** holding more than 25% of the shares of the corporate (if any) or of another shareholding company, a copy (or online extract) of the following documents must be provided:
- certificate of incorporation (or equivalent e.g. extract of trade register); and
 - ⇒ confirming the following information:
 - company name;
 - date and country of incorporation/registration;
 - official identification number with the trade register or the relevant authority;
 - registered office address;
 - list of directors.
- D. To verify the **identity of any ultimate beneficial owner** (natural person) holding directly more than 25% of the shares of the corporate or of a shareholding company, the following must be provided:
- A declaration of ultimate beneficial ownership;
 - a copy of an identity document (passport, identity card, driving license,...) and upon request of a utility bill;
 - upon request, the Private Person’s Profile Form (Appendix 3).



- E. If no natural person qualifies as an ultimate beneficial owner, as per D. above, to verify **the identity of the Controlling Persons**, a copy of an identity document (passport, identity card, driving license...) and of a utility bill.
- F. To ascertain **the authority** of the signatories **to engage** the corporate when executing (i) the Account Opening Form, (ii) this Identification and Verification Form and (iii) any subsequent written instructions:
- copy of the List of Authorised Signatories, or any restricted list of signatories deemed to represent the corporate in its professional relationship with the Fund, together with the granted powers.
 - copy of an identity document of the authorised signatories, and upon request of a utility bill.



APPENDIX 1.8. ASSOCIATION / NON-PROFIT ORGANIZATION

DOCUMENTATION REQUIRED:

- A. To verify **the identity, the object and the existence of the association** / organization, a copy (or online extract) of the following documents must be provided:
- certificate of incorporation / association (or equivalent e.g. extract of trade register); and
 - articles of association, memorandum of association or equivalent constitutive document(s) (or extracts thereof);
 - ⇒ confirming the following information:
 - organization / association name;
 - date and country of domicile / registration;
 - official identification number with the trade register or the relevant authority;
 - registered office address;
 - list of directors.
 - last audited financial statements (annual report).
- B. To confirm the ownership and verify **the identity of any ultimate beneficial owner** (natural person) holding directly more than 25% of the interests in the association / organization, the following must be provided:
- a declaration of ultimate beneficial ownership;
 - a copy of an identity document (passport, identity card, driving license,...) and upon request of a utility bill;
 - upon request, the Private Person's Profile Form (Appendix 3).
- C. If no natural person qualifies as an ultimate beneficial owner, as per D. above, to verify **the identity of the Controlling Persons**, a copy of an identity document (passport, identity card, driving license,...) and of a utility bill.
- D. To ascertain **the authority** of the signatories **to engage** the corporate when executing (i) the Account Opening Form, (ii) this Identification and Verification Form and (iii) any subsequent written instructions:
- copy of the List of Authorised Signatories, or any restricted list of signatories deemed to represent the corporate in its professional relationship with the Fund, together with the granted powers;
 - copy of an identity document of the authorised signatories, and upon request of a utility bill.



APPENDIX 2 – AEOI-CRS CONTROLLING PERSONS’ IDENTIFICATION FORM

Name of the entity concerned:

(being hereinafter referred to as the “**Entity**”)

Registered office address

Street/No.

City

Postal code

Country

Please tick the box corresponding to the AEOI-CRS status of the entity.

(a) Financial Institution – Professionally managed investment entity

☐

(b) Financial Institution – Other

☐

(c) Active NFE – Corporation that is publicly traded or an affiliate of a publicly traded corporation

☐

(d) Active NFE – Government entity

☐

(e) Active NFE – Category of entity other than those listed in (c) to (d)

☐

(f) Passive NFE

☐

Please tick the box corresponding to the type of Controlling Person:

CRS801	Controlling Person of a legal person - control by ownership	<input type="checkbox"/>
CRS802	Controlling Person of a legal person - control by other means	<input type="checkbox"/>
CRS803	Controlling Person of a legal person - senior managing official	<input type="checkbox"/>
CRS804	Controlling Person of a trust - settlor	<input type="checkbox"/>
CRS805	Controlling Person of a trust - trustee	<input type="checkbox"/>
CRS806	Controlling Person of a trust - protector	<input type="checkbox"/>
CRS807	Controlling Person of a trust - beneficiary	<input type="checkbox"/>
CRS808	Controlling Person of a trust - other	<input type="checkbox"/>
CRS809	Controlling Person of a legal arrangement (non-trust) - settlor-equivalent	<input type="checkbox"/>
CRS810	Controlling Person of a legal arrangement (non-trust) - trustee-equivalent	<input type="checkbox"/>
CRS811	Controlling Person of a legal arrangement (non-trust) - protector-equivalent	<input type="checkbox"/>
CRS812	Controlling Person of a legal arrangement (non-trust) - beneficiary-equivalent	<input type="checkbox"/>
CRS813	Controlling Person of a legal arrangement (non-trust) - other-equivalent	<input type="checkbox"/>



AEOI-CRS Identification of the Controlling Person:

Title

Date of birth*

First or given names*

City or town of birth*

Last or family name*

Country of birth*

Permanent residence address of the Controlling Person:

Line 1 (e.g. number and street)*

Line 2 (e.g. postal code and town)*

City*

Country*

AEOI-CRS Tax residence(s) and tax identification number(s) of the Controlling Person:

Country of residence for tax purposes*

Tax Identification Number*

If the TIN is unavailable, please explain the reason*:

- If the Controlling Person has additional tax residence country(ies), please provide:
 - such additional tax residence country(ies) and TIN(s) on a separate sheet (duly signed, dated with the last and first names of the authorised signatory or the Controlling Person); and
 - documentary evidence (e.g. certificate of residence, tax income document) for each additional country in which the Controlling Person is resident for tax purposes.
- If there is more than one Controlling Person (e.g. Controlling Person No. 2, No. 3 ...), please provide the printed identification information of such additional Controlling Persons in a separate sheet with all the above "AEOI-CRS Controlling Persons Identification" (duly signed, dated with the last and first names of the authorised signatories).

The Fund, in which the Entity (for which you declare being a Controlling Person) intends to invest, as well as Edmond de Rothschild Asset Management (Luxembourg) ("EDRAM") (and its processing agent, suppliers and other third parties as the case may be) have due AML / CFT diligence obligations about investors with which the Fund will enter into relationship, and respectively for which EDRAM (and its processing agent, suppliers and other third parties as the case may be) will open an account in the books of the Fund. To satisfy such obligations, they will process information, including personal data about the investor, its beneficial owners, representatives and authorized signatories as well as information about the same persons of any shareholding entity of the investor. Such information may constitute personal data under the EU Data Protective Directive and locally implementing laws uncovered by the EU Data Protective Directive.



The Fund as well as EDRAM (and its processing agent, suppliers and other third parties as the case may be) shall protect the personal data that come into their possession in the context of the investor's investments in the Fund.

By signing this form, you acknowledge being informed of the processing of your personal data.

The personal data collected in this form is processed by Edmond de Rothschild Asset Management (Luxembourg) ("**EDRAM**") as:

- **processor (or sub-processor)** within the meaning of *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("GDPR")*: when EDRAM, as central administration, processes this personal data (ultimately) on behalf of the investment vehicle (the "**Fund**") in which the Entity intends to invest. Further information on personal data processing in this circumstance is provided in the Fund's personal data protection policy/notice; and/or
- **controller** within the meaning of GDPR: when EDRAM processes this personal data on its own behalf in the context of its activities. The conditions under which this data is processed by EDRAM as controller are detailed in its personal data protection charter which is available in several languages on the website www.edmond-de-rothschild.eu in the "your personal data" section. Further information thereon may also be obtained at the following email address: DPO-eu@edr.com. Please transmit this charter to any relevant natural person whose personal data could be processed by EDRAM as controller, such as (as the case may be) the Controlling Person identified in this form.

1st authorized signatory*

Date:

Place:

First name:

Last name:

Signature:

2nd authorized signatory* (if a second signatory)

Date:

Place:

First name:

Last name:

Signature:



APPENDIX 3 – PROFILING FORM FOR SHAREHOLDERS / SETTLORS QUALIFYING AS ULTIMATE BENEFICIAL OWNERS

IMPORTANT INFORMATION

Dear Madam,

Dear Sir,

To the extent you (“**You**”) are a beneficial owner of an investment in an investment vehicle (hereinafter the “**Fund**”) for which we, Edmond de Rothschild Asset Management (Luxembourg), act as central administration, we are imposed by applicable laws and regulations to collect identification information about You. Such requirement includes, but is not limited to, the collection of identification information about:

- Your personal identity;
- Your financial situation;
- Your source of wealth;
- Your political or other public activities.

We therefore kindly ask You to carefully complete this form so that we can satisfactorily perform our duties.

Please be advised that:

1. The information below can in principle also be provided by a financial professional who maintains a close relationship with You.
2. We expressly reserve the right to contact You for any further information, in particular for financial or professional references and proof of your source of wealth.

1. YOUR PERSONAL IDENTIFICATION DATA

Full name:

Place and date of birth:

Nationality:

Address:

Identity card no.:

2. YOUR CURRENT TOTAL ANNUAL INCOME

- ☐ < EUR 100,000 ☐ EUR 100,000 to 250,000 ☐ EUR 250,000 to 500,000
☐ EUR 500,000 to 1,000,000 ☐ EUR 1,000,000 to 3,000,000 ☐ > EUR 3,000,000

Main source(s):



3. YOUR FINANCIAL SITUATION

Estimated range of your current wealth

- ☐ < EUR 100,000
- ☐ EUR 100,000 to 1,000,000
- ☐ EUR 1,000,000 to 3,000,000
- ☐ EUR 3,000,000 to 5,000,000
- ☐ EUR 5,000,000 to 10,000,000
- ☐ EUR 10,000,000 to 20,000,000
- ☐ EUR 20,000,000 to 50,000,000
- ☐ EUR 50,000,000 to 100,000,000
- ☐ > EUR 100,000,000

4. YOUR SOURCE OF WEALTH

Which of the following sources made most of your wealth? *(You may select several options if relevant.)*

TYPES OF SOURCES	Yes	No
	It does contribute Please indicate the box reflecting the relevant percentage of contribution to Your total wealth**	It does not significantly contribute*
Remuneration from a professional activity	<input type="checkbox"/> A <input type="checkbox"/> L <input type="checkbox"/> P	<input type="checkbox"/>
Capital gains, dividends, unrealized gains from holding of shares in commercial companies	<input type="checkbox"/> A <input type="checkbox"/> L <input type="checkbox"/> P	<input type="checkbox"/>
Inheritance/donation	<input type="checkbox"/> A <input type="checkbox"/> L <input type="checkbox"/> P	<input type="checkbox"/>
Capital gains, renting revenues, unrealized gains from real estate properties	<input type="checkbox"/> A <input type="checkbox"/> L <input type="checkbox"/> P	<input type="checkbox"/>
Capital gains, income distributed, unrealized gains from investments in financial assets	<input type="checkbox"/> A <input type="checkbox"/> L <input type="checkbox"/> P	<input type="checkbox"/>
Others	<input type="checkbox"/> A <input type="checkbox"/> L <input type="checkbox"/> P	<input type="checkbox"/>

* "It does not significantly contribute" = Less than 30% of your total wealth

** 30% – 50% Ancillary (A), 50% – 70% Largely (L), > 70% Predominantly (P)

Where you selected L and P, please complete Section "Source of Wealth/Self Declaration".

5. YOUR POLITICAL AND OTHER PUBLIC ACTIVITIES



Have You (or any of your first degree relatives) held a political office or exercised a public function over the last 12 months?

- ☐ No
☐ Yes

If yes, please describe:

If yes, do You (or your first degree relative(s)) still hold this political office or exercise this public function?

- ☐ Yes
☐ No

If no, please explain:

6. IF THE INFORMATION IS PROVIDED BY A FINANCIAL PROFESSIONAL ON YOUR BEHALF

Name of the professional:

Represented by (and job title):

Address:

Regulated by:

Relationship with You:

7. PROTECTION OF PERSONAL DATA

The personal data collected in this form is processed by us as:

Processor (or sub-processor) within the meaning of the *Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016, on the protection of natural persons with regard to the processing of personal data and on the free movement of such data ("GDPR")*: when we process this personal data (ultimately) on behalf of the Fund. Further information on personal data processing in this circumstance is provided in the Fund's personal data protection policy/notice; and/or

Controller within the meaning of GDPR: when we process this personal data on our own behalf in the context of our activities. The conditions under which this data is processed by us as controller are detailed in our personal data protection charter which is available in several languages on the website www.edmond-de-rothschild.eu in the "your personal data" section. Further information thereon may also be obtained at the following email address: DPO-eu@edr.com. You are kindly requested to transmit this charter to any relevant natural person whose personal data could be processed by us as controller, such as (where applicable) your relatives, representatives, officers, attorneys, agents, contact persons and/or any other related persons.



8. DECLARATIONS AND SIGNATURE

In your capacity as beneficial owner of an investment in the Fund for which Edmond de Rothschild Asset Management (Luxembourg) (hereafter “we”, “our” or “us”) acts as central administration, you represent that:

- The Profiling Form for Beneficial Owners has been filled in properly and all information provided is true and accurate.
- You understand and acknowledge that we compare signatures with the specimens held at our offices without having to proceed with a more detailed investigation. You confirm that, with the exception of legally binding regulations, our obligations shall be limited to an obligation of means and we will only be liable in the case of gross misconduct. Once the signature complies at first glance with the specimen held at our offices, we shall not be held responsible for any direct or indirect losses, damages, costs, fees or any other liabilities caused by the fact that the signature on the instructions or declarations given to us is fraudulent. We can rely on the signature below without having to proceed with a more detailed investigation and decline all responsibility for any direct or indirect losses, damages, costs, fees or any other liabilities that could result from the absence of any legitimization or any undetected forgery.
- You are aware that we assume no liability for failure to process an order as a result of incomplete or inaccurate information presented by you in this Profiling Form for Beneficial Owners.
- You understand and acknowledge that we are not liable for any losses, damages, costs, fees or any other liabilities which may be directly or indirectly caused by the lack of authenticity or validity of the authorisations which refer to you or third parties with the legal capacity to act on your behalf.
- You understand and acknowledge that we reserve the right to refuse to process an instruction from any person whose identity and permissions have not been sufficiently established in our eyes.
- You acknowledge and confirm that we shall not be responsible for any direct or indirect losses, damages, costs, fees or any other liabilities caused due to a change of your legal capacity or the capacity of third parties authorised to act on your behalf, unless we have received conclusive and documented prior reasonable written notice of such change.
- You acknowledge and confirm that you shall compensate and reimburse us for all complaints, claims, legal action, fees, expenses, damages, losses or other sums paid or responsibilities incurred by us resulting from the proper execution by us of an instruction on your part.
- You will immediately inform us of any change in the information provided in this Profiling Form for Beneficial Owners.
- You are duly authorised to sign this Profiling Form for Beneficial Owners.
- You authorise us to share your information with our delegate(s) and/or sub-contractor(s) and with any entity in the Edmond de Rothschild group.
- The source of wealth declared by you in this Profiling Form for Beneficial Owners does not derive from illegal activities as described under the recommendations issued by the Financial Action Task Force on Money Laundering (FATF).
- The assets/funds invested do not or shall not directly or indirectly come from any unlawful or criminal activity and that the assets/funds invested shall not be used in connection with money-laundering or terrorism financing purposes.
- The investment in the Fund is not originating from a tax fraud and shall not serve any purpose of tax fraud.
- You are aware of the tax obligations applying to you pursuant to your holding of shares/ units in the Fund, and you will comply with the tax declaration obligations to the competent tax authority as imposed to you in your country of tax residency.



- You are aware that, within the context of the investment in the Fund, your telephone conversations with us may be recorded.
- You acknowledge that you are aware of your responsibility to comply with all applicable laws and regulations. It is therefore your responsibility to seek any assistance from qualified independent advisors as necessary.
- Any and all disputes resulting from this form are exclusively governed by applicable Luxembourg laws and shall exclusively be referred to the Luxembourg competent court.

Date and signature of the declarant:

Place:

Date:

Your signature:

Your name:



SOURCE OF WEALTH

SELF DECLARATION

SECTION 1: REMUNERATION FROM A PROFESSIONAL ACTIVITY

Type of profession:

Job title:

SECTION 2: MARKET VALUE, DIVIDENDS, UNREALIZED GAINS FROM HOLDING OF SHARES IN COMMERCIAL COMPANIES

Please fill in the following information only if You own more than 20% of the shareholding.

Name of company 1:

Address:

Percentage of ownership:

- ☐ 20% – 40%
- ☐ 40% – 60%
- ☐ 60% – 80%
- ☐ 80% – 100%

Name of company 2:

Address:

Percentage of ownership:

- ☐ 20% – 40%
- ☐ 40% – 60%
- ☐ 60% – 80%
- ☐ 80% – 100%

SECTION 3: INHERITANCE/DONATION

Date of donation:

Donor (name and link with the person):



SECTION 4: CAPITAL GAINS, RENTING REVENUES, UNREALIZED GAINS FROM REAL ESTATE PROPERTIES

Property type:

Holding period (from, to):

Location:

SECTION 5: CAPITAL GAINS, INCOME DISTRIBUTED, UNREALIZED GAINS FROM INVESTMENTS IN FINANCIAL ASSETS

Asset Class:

Holding period (from, to):

SECTION 6: OTHERS

Please provide concise explanation of your source of wealth if it is not included above:

Date and signature of the declarant:

Place:

Date:

Your signature:

Your name:



APPENDIX 4 – COMPANY’S LETTERHEAD

[City, Date]

Dear Madam, dear Sir,

Re: AML / CFT Comfort Letter – [Name of the Account Holder or of the entity executing KYC for the Account Holder]

As part of our investment / the investment of [Name of the Customer] (please select appropriate situation) in [Name of the Fund], we, [Name of financial institution], incorporated in [Country of establishment], affirm that we are regulated as a [Institution type] by the [Name of the financial supervisory authority] to carry out the business of [Authorized or.].

Accordingly, we confirm that:

- We are aware of the provisions of the prospectus of the Fund; we shall not allow the purchase or holding of units or shares of the Fund by persons not authorized to purchase or hold them according to the provisions of the prospectus.
- We have issued Anti Money Laundering and Counter Terrorism Financing (AML / CFT) Policies and Procedures which comply with the Laws, Regulations and Circulars related to Anti Money Laundering and Counter Terrorism Financing in [Country of establishment] (hereinafter “the AML / CFT Regulation”), country having implemented the recommendations of the Financial Action Task Force (FATF) regarding the fight against money laundering and terrorist financing.
- We have procedures in place to establish each customer’s identity by ensuring that all the necessary information required by the Luxembourg Anti Money Laundering and Counter Terrorism Financing legislations has been obtained from all customers and is retained on file by us.
- We implement a compliance function in charge of the elaboration of the AML / CFT program. The latter is approved by our Senior Management.
- The proper implementation of the AML / CFT program, our related procedures and practices are regularly audited by an independent internal audit function or an independent third party.
- We have access to and verify to the extent as required by the AML / CFT Regulation the identity, including (i) true name and proof of current permanent residence of all customers (both regular and occasional), (ii) the identity of all other persons acting for and on behalf of such customers, (iii) the identity of all other persons for whom such customers act as nominee, trust or fiduciary as well as (iv) the identity of any other person having a beneficial interest (i.e. Beneficial owner(s)) in the investment registered in the name of one of such customers.
- In the event that the customer is a legal entity, we have access to constitutional documents of the legal entity itself and any legal entities or legal arrangements in the shareholding structure (i.e. the Shareholders), a list and documentation of identification of directors and executive officers (or identifying information pertaining to these



directors and officers), evidence that the persons executing any document on behalf of the customer are properly authorized to do so, and access to the identity, as detailed above, of the Beneficial owner(s) of the customer - legal entity;

- The source of funds and the source of wealth of each customer are identified and an assessment that the source of funds and the source of wealth of the customer and/or its beneficial owner are not derived from illegal sources is performed.
- We have procedures in place to ascertain that the customers and their beneficial owners by ownership (in case of legal entities) comply with the taxation provisions in their country of domicile or residence.
- In accordance with the AML / CFT Regulation, we apply an enhanced due diligence on nominee / intermediary accounts.
- Moreover, the customer due diligence measures comprise periodic reviews of the Know Your Customer information on file.
- In the event of any modification in the structure of the customer, including change with respect to the beneficial owners, we confirm that we will update the aforementioned information.
- We confirm that we monitor transactions to ensure detection of any sums of money that may be related to money-laundering activities and the financing of terrorism.
- We also confirm that, at the best of our knowledge, none of our customers appears in international sanctions regimes which refer herein to economic, financial and trade-based sanctions imposed or administrated by the European Union, the US Office of Foreign Assets Control (OFAC) and the UN Security Council Sanctions Committee.
- We confirm that we have appropriate procedures in place for the identification and monitoring of politically exposed persons (PEPs), their family members and close associates, which include enhanced customer due diligence on identified PEPs. We use all reasonable efforts to verify that the source of amounts invested is not the proceeds of corruption or other illegal activity.
- In the event of any enquiry from governmental and law enforcement authorities, we will provide the requested information.
- In accordance with the AML / CFT Policies and Procedures and applicable AML / CFT Regulation, we shall retain for a minimum of five years, following the end of a business relationship or following the date of an occasional transaction, all documentation related to this business relationship and all records of transactions, in original form or in the form of copies admissible in judicial proceedings under the applicable national law.
- Furthermore we hereby confirm that our AML / CFT Policies and Procedures prohibit entering into a relationship with any shell bank.
- We endeavor not to search for customers, not to solicit customers, nor to offer or sell any units or shares in the Fund, unless we may do so in compliance with the laws and regulations applicable in [country].
- On an (at least) annual basis, we provide appropriate AML / CFT training to our employees, in accordance with the laws and regulations applicable to us in [country].



We ensure that all officers and agents used by us comply are subject to the same AML / CFT training standards.

- We will inform you in case our license has been withdrawn by [Name of the financial supervisory authority] and/or in case our status as regulated entity has changed.
- To date and to the best of our knowledge, we are not aware and have no reason to suspect that any of the customers on whose behalf we act are involved in criminal conduct, money laundering or terrorist activities. Should we become suspicious of any such activity, we shall observe our reporting obligations in accordance with the legal requirements in this respect.
- In the course of your due diligence:
 - We agree to provide you with any information needed relating to the underlying customer on whose behalf we act;
 - We will inform you once we become aware of any introduced investor being engaged in activities which lead us to believe that any of the customers on whose behalf we act are involved in criminal conduct, money laundering or terrorist activities.

The above representations shall be deemed reiterated at each time an order is placed in the Fund and shall continue throughout the period of investment in the Fund (unless notification by us of the contrary).

Yours faithfully,

For and on behalf of:

1st authorized signatory*

Date:

Place:

First name:

Last name:

Signature:

2nd authorized signatory* *(if a second signatory)*

Date:

Place:

First name:

Last name:

Signature: