the Wolfsberg Group

Financial Institution Name: Location (Country) : Ellipsis Asset Management France

No #	Question	Answer
-	TITY & OWNERSHIP	
1	Full Legal name	Ellipsis Asset Management
-	Append a list of foreign branches which are covered by	
2	this questionnaire (if applicable)	
3	Full Legal (Registered) Address	112 avenue Kleber, 75116 Paris
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation/establishment	11/05/2011
5	Select type of ownership and append an ownership	11/03/2011
6	chart if available	
6 a		No
6 a1	Publicly Traded (25% of shares publicly traded)	
6 b	Member Owned/Mutual	No
	· ·	No
6 c 6 d	Government or State Owned by 25% or more	
6 a	Privately Owned	Yes
6 d1	If Y, provide details of shareholders or ultimate	Laurent Quirin holds indirectly 26% of the voting rights
	beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer	0
	shares	
8	Does the Entity, or any of its branches, operate under	No
	an Offshore Banking License (OBL) ?	
8 a	If Y, provide the name of the relevant branch/es	
	which operate under an OBL	
9	Does the Bank have a Virtual Bank License or provide	No
10	services only through online channels?	
10	Provide Legal Entity Identifier (LEI) if available	969500DEKQHM09GPQM16
2. AN	AL, CTF & SANCTIONS PROGRAMME	
	Does the Entity have a programme that sets minimum	
11	AML, CTF and Sanctions standards regarding the	
	following components:	
11 a	Appointed Officer with sufficient	Yes
	experience/expertise	
11 b	Adverse Information Screening	Yes
11 c	Beneficial Ownership	Yes
11 d	Cash Reporting	No
11 e	CDD	Yes
11 f	EDD	Yes
11 g	Independent Testing	Yes
11 h	Periodic Review	Yes
11 i	Policies and Procedures	Yes
11 j	PEP Screening	Yes
11 k	Risk Assessment	Yes
11	Sanctions	Yes
11 m	Suspicious Activity Reporting	Yes
11 n	Training and Education	Yes
11 o	Transaction Monitoring	No
12	Is the Entity's AML, CTF & Sanctions policy approved at	N .
	least annually by the Board or equivalent Senior	Yes
	Management Committee?	
13	Does the Entity use third parties to carry out any	Yes
	components of its AML, CTF & Sanctions programme?	

13 a	If Y, provide further details	Part of the DD are delegated to the compliance department of our mothe company but remain in our control. The third line of defence is delegated to the audit department of our mother
		company.
14	Does the entity have a whistleblower policy?	Yes
3. AN	ITI BRIBERY & CORRUPTION	
	Has the Entity documented policies and procedures	
15	consistent with applicable ABC regulations and	Yes
	requirements to prevent, detect and report bribery	
	and corruption? Does the Entity's internal audit function or other	
16	independent third party cover ABC Policies and	Yes
10	Procedures?	1 55
17	Does the Entity provide mandatory ABC training to:	
17 a	Board and Senior Committee Management	Yes
17 b	1st Line of Defence	Yes
<u>17 с</u>	2nd Line of Defence	Yes
17 d	3rd Line of Defence	No
	Third parties to which specific compliance activities	
17 e	subject to ABC risk have been outsourced	No
475	Non-employed workers as appropriate	Vee
17 f	(contractors/consultants)	Yes
4. AN	/IL, CTF & SANCTIONS POLICIES & PROCEDURES	
	Has the Entity documented policies and procedures	
10	consistent with applicable AML, CTF & Sanctions	
18	regulations and requirements to reasonably prevent,	
	detect and report:	
18 a	Money laundering	Yes
18 b	Terrorist financing	Yes
18 c	Sanctions violations	Yes
19	Does the Entity have policies and procedures that:	
19 a	Prohibit the opening and keeping of anonymous and	Yes
	fictitious named accounts	
19 b	Prohibit the opening and keeping of accounts for	Yes
-	unlicensed banks and/or NBFIs	
19 c	Prohibit dealing with other entities that provide	Yes
19 d	banking services to unlicensed banks Prohibit accounts/relationships with shell banks	Yes
19 u	Prohibit dealing with another Entity that provides	
19 e	services to shell banks	Yes
	Prohibit opening and keeping of accounts for Section	
19 f	311 designated entities	Yes
	Prohibit opening and keeping of accounts for any of	
	unlicensed/unregulated remittance agents,	X.
19 g	exchanges houses, casa de cambio, bureaux de	Yes
	change or money transfer agents	
	Assess the risks of relationships with domestic and	
19 h	foreign PEPs, including their family and close	Yes
	associates	
	Define the process for escalating financial crime risk	
19 i	issues/potentially suspicious activity identified by	Yes
	employees	
10;	Outline the processes regarding screening for	Yes
19 j	sanctions, PEPs and negative media	1 63
	Has the Entity defined a risk tolerance statement or	
20	similar document which defines a risk boundary	No
	around their business?	
21	Does the Entity have record retention procedures that	Yes
	comply with applicable laws?	
21 a	If Y, what is the retention period?	5 years or more

5 KV	C, CDD and EDD	
	Does the Entity verify the identity of the customer?	Yes
		res
	Do the Entity's policies and procedures set out when	Yee
23	CDD must be completed, e.g. at the time of	Yes
	onboarding or within 30 days?	
24	Which of the following does the Entity gather and	
24 -	retain when conducting CDD? Select all that apply:	Vee
24 a	Customer identification	Yes
24 b	Expected activity	Yes
24 c 24 d	Nature of business/employment	Yes
	Ownership structure	Yes
24 e 24 f	Product usage	Yes
	Purpose and nature of relationship	Yes
24 g	Source of funds	Yes
24 h	Source of wealth	Yes
	Are each of the following identified:	N
25 a	Ultimate beneficial ownership	Yes
25 a1	Are ultimate beneficial owners verified?	Yes
25 b	Authorised signatories (where applicable)	Yes
25 c	Key controllers	Yes
25 d	Other relevant parties	
26	Does the due diligence process result in customers	Yes
	receiving a risk classification?	
	Does the Entity have a risk based approach to	
21	screening customers and connected parties to	Yes
	determine whether they are PEPs, or controlled by	
	PEPs?	
	Does the Entity have policies, procedures and	
	processes to review and escalate potential matches	No.
	from screening customers and connected parties to	Yes
	determine whether they are PEPs, or controlled by	
	PEPs?	
29	Is KYC renewed at defined frequencies based on risk	Yes
•••	rating (Periodic Reviews)?	
29 a	If yes, select all that apply:	
29 a1	Less than one year	No.
29 a2	1 – 2 years	Yes
29 a3	3 – 4 years	Yes
29 a4	5 years or more	N
29 a5	Trigger-based or perpetual monitoring reviews	Yes
29 a6	Other	
	From the list below, which categories of customers or	
30	industries are subject to EDD and/or are restricted, or	
20 -	prohibited by the Entity's FCC programme?	EDD on a risk based approach
30 a 30 b	Arms, Defence, Military	••
30.0	Correspondent Banks	Do not have this category of customer or industry
	If EDD or EDD & restricted, does the EDD	
30 b1	assessment contain the elements as set out in the	
	Wolfsberg Correspondent Banking Principles	
20 -	2022?	Do not have this entergony of systematics in the training
30 c	Embassies/Consulates	Do not have this category of customer or industry
30 d	Extractive industries	Do not have this category of customer or industry
30 e	Gambling customers	Do not have this category of customer or industry
30 f	General Trading Companies	Do not have this category of customer or industry
30 g	Marijuana-related Entities	Do not have this category of customer or industry
30 h	MVTS/ MSB customers	Do not have this category of customer or industry
30 i	Non-account customers	Do not have this category of customer or industry
30 j	Non-Government Organisations	Do not have this category of customer or industry
30 k	Non-resident customers	EDD on a risk based approach
	Nuclear neuror	
30 I	Nuclear power	EDD on a risk based approach
	Nuclear power Payment Service Provider PEPs	EDD on a risk based approach Do not have this category of customer or industry Always subject to EDD

30 p PEP Related Average subjects DED 30 r Precious metals and stones EDD on a risk based approach 30 r Red light businesses/Adult entertainment Do not have this category of customer or industry 30 s Regulated charities Do not have this category of customer or industry 30 u Travel and Tour Companies EDD on a risk based approach 30 u Unregulated charities Do not have this category of customer or industry 30 u Victa daset Service Providers Do not have this category of customer or industry 30 v Victa daset Service Providers Do not have this category of customer or industry 30 v Victa daset Service Providers Do not have this category of customer or industry 30 v Victa daset Service Providers Do not have this category of customer or industry 30 v Victa daset Service Providers Do not have this category of customer or industry 30 v Victa daset Service Providers Do not have this category of customer or industry 30 v Victa daset Service Providers Do not have this category of customer or industry 30 v Victa daset Service Providers Combination of automated and manual transactions for supplicous activity? 31 dif manual combination of supplicous activity? Complex transactions Complex transactions 31 dif manual co	30 o	PEP Close Associates	Always subject to EDD
30 q Precious metals and stones EDD on a risk based approach 30 r Regulated charities EDD on a risk based approach 30 r Regulated charities EDD on a risk based approach 30 r Shell banks Do not have this category of customer or industry 30 r Shell banks EDD on a risk based approach 30 u Urravel and Tour Companies EDD on a risk based approach 30 u Urravel and Tour Companies EDD on a risk based approach 30 u Urravel and Tour Companies EDD on a risk based approach 30 u Urravel and Tour Companies EDD on a risk based approach 30 u Urravel and Tour Companies EDD on a risk based approach 30 u Urravel and Sector Providers Do not have this category of customer or industry 30 y Uther respective Providers Do not have this category of customer or industry 30 v Urravel and sector Providers Do not have this category of customer or industry 31 u If restricted, provide details of the restriction Combination of automated and manual 1 reporting requirements complication sciently approach Complex transactions 33 a If manual or combination selected, specify what type Complex transactions 34 a processes to comply with suppicious transactions? Yes			
30 T Red light businesses/Adult entertainment Do not have this category of customer or industry 30 Regulated charities Do not not we this category of customer or industry 30 L Shell banks Do not have this category of customer or industry 30 L Travel and Tux Companies EDD on a risk based approach 30 V Unregulated charities EDD on a risk based approach 30 W Used Car Dealers Do not have this category of customer or industry 30 W Used Car Dealers Do not have this category of customer or industry 30 W Used Car Dealers Do not have this category of customer or industry 30 W Used Car Dealers Do not have this category of customer or industry 30 W Used Car Dealers Do not have this category of customer or industry 30 W Used Set Entity have risk based policies, procedures and nonitoring processes for the identification and reporting of suspicious activities? Combination of automated and manual 31 differentiation series of comply with suspicious transactions are monitored manually Complex transactions Complex transactions 32 a fir manual or combination selected, specify what type of transactions are monitored manually Yes Complex transactions 33 a fir first up above to the Wolfsborg Group Payment Transparency Standard? Yes Complex transactions 34 processes to comply with suspici			
30 5 Regulated charities EDD on a risk based approach 30 1 Shelb banks On on the we this category of customer or industry 30 1 Shelb banks Do not nike based approach 30 1 Shelb banks Do not have this category of customer or industry 30 1 Shelb banks Do not have this category of customer or industry 30 1 Shelb category Do not have this category of customer or industry 30 1 Shelb category Do not have this category of customer or industry 30 1 Shelb category Do not have this category of customer or industry 30 1 Shelb category Do not have this category of customer or industry 30 2 Uter (specify) Do not have this category of customer or industry 31 1 If restricted, providers Do not have this category of customer or industry 32 Does the Entity have risk based aplicies, procedures Combination of automated and manual transactions for subcitous activities? 33 a If manual or combination selected, specify what type of transactions? Yes 34 a processes to comply with subspicious transactions? Yes 35 a processes to comply with subspicious transactions? Yes 36 boes the Entity have policies, procedures and processes to rownly with subspicious transactions and activity? Yes 7			
30 t Shell banks Do not have this category of customer or industry 30 u Travel and Tour Companies EDD on a risk based approach 30 w Used Car Dealers Do not have this category of customer or industry 30 w Used Car Dealers Do not have this category of customer or industry 30 w Used Car Dealers Do not have this category of customer or industry 30 w Used Car Dealers Do not have this category of customer or industry 30 w Used Car Dealers Do not have this category of customer or industry 30 w Used Car Dealers Do not have this category of customer or industry 30 w Transactions for subjcious activites? Combination of automated and manual 31 af framal or combination selected, specify what type of transactions are monitored manually Complex transactions 32 af the fitty have regulatory requirements to reports subjcious transactions? Yes 33 a fit framulatory requirements? Yes 34 processes to comply with suspicious transactions are provided wand escalare matters arising from the monitoring of customer transactions and activity? 7. PAVMENT TRANSPARENCY 36 Does the Entity have policies, procedures and processes to complay with and have controls in place to ensure complance with: 37 af AFE Recommendation 16 No 37 b Local Regulations No 37 b Local Reg			
30 U Travel and Tour Companies EDD on a risk based approach 30 U Unregulated charities EDD on a risk based approach 30 U Used Car Dealers Do not have this category of customer or industry 30 V Utrual Asset Service Providers Do not have this category of customer or industry 30 V Utrual Asset Service Providers Do not have this category of customer or industry 30 V Utrual Asset Service Providers Do not have this category of customer or industry 30 V Utrual Asset Service Providers Do not have this category of customer or industry 30 V Utrual Asset Service Providers Do not have this category of customer or industry 31 If frestricted, provide details of the restriction Formation Combination Service Providers Combination of automated and manual 31 If frestricted, provide used by the Entity to monitor transactions for supcilocus activities? Complex transactions Complex transactions 33 If freqort supplicious catorisactions? Yes Complex transactions? Yes 34 If y does the Entity have policies, procedures and processes to comply with supplicious transactions and processes to comply with supplicious transactions and processes to comply with supplicious transactions and processes to comply with addres? Yes 35 Does the Entity have policies, procedures and processes to comply with addres? No 36 Does the Entity have policies, procedure			
30 u Unregulated charities EDD on a risk based approach 30 w Used Car Dealers Do not have this category of customer or industry 30 v Other (specify) Do not have this category of customer or industry 30 v Other (specify) Do not have this category of customer or industry 30 v Other (specify) Do not have this category of customer or industry 30 v Mitual Asset Service Providers Do not have this category of customer or industry 30 v Other (specify) Do not have this category of customer or industry 30 v Mita is the method used by the Entity to monitor transactions are monitored manually Complex transactions 31 d of transactions are monitored manually. Complex transactions Complex transactions 34 processes to comply with suspicious transactions? Yes Presting requirements? Yes 35 processes to comply with suspicious and activity? Yes Yes Processes to comply with suspicious and activity? 36 processes to comply with suspicious and activity? Yes Yes Yes 37 bith TRANSPARENCY Yes Yes Yes 38 processes to comply with and have co	30 t		
30 w Used Car Dealers Do not have this category of customer or industry 30 v Virtual Asset Service Providers Do not have this category of customer or industry 30 v Virtual Asset Service Provide details of the restriction Do not have this category of customer or industry 31 /// firestricted, provide details of the restriction Combined in the intervention of automated and manual 31 /// firestricted, provide details of the restriction and reporting of suspicious activities? Combination of automated and manual 32 and monitoring processes for the identification and reporting of suspicious transactions? Complex transactions 33 a If manual or combination selected, specify what type of transactions? Complex transactions 34 a obes the Entity have requirements to report supcilous transactions Yes 35 processes to comply with supcilous transactions Yes 36 Does the Entity have policies, procedures and processes to comply with supcilous transactions and activity? No 36 processes to comply with and have controls in place to ensure compliance with and have controls in place to ensure compliance with and have controls in place to ensure compliance with and have controls in place to ensure complance with and have controls in place to state to avad englicales procedures on the transactions 20 fb. 37 If Art Recommendation 16 No	30 u	Travel and Tour Companies	EDD on a risk based approach
30 x Virtual Asset Service Providers Do not have this category of customer or industry 30 y Otter (specify) 31 if restricted, provide details of the restriction 6. MONITORING & REPORTING 32 and monitoring processes for the identification and reporting of suspicious activity? 33 a If manual or combination selected, specify what type of transactions are monitored manually 4 Does the Entity have risk specify what type of transactions are monitored manually 34 a processes to comply with suspicious transactions reporting requirements to report suspicious transactions, procedures and processes to comply with suspicious transactions reporting requirements? 34 a processes to comply with suspicious transactions and activity? 7. PAYMENT TRANSPARENCY 36 boas the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: 37 a 37 bit ff y, dest the fitty have policies, procedures and processes to comply with and have controls in place to ensure compliance with: 37 a 37 bit ff y, dest the fitty have place, sprocedures and processes to comply with and have controls in place to ensure compliance with: 37 bit 37 bit ff y, specify the regulation 37 bit ff y, specify the regulation 37 bit ff y, specify the regulation 38 applicable to the Entity including with spect to its business conducted with, or through accounts held at foreign financial institutions? </th <th>30 v</th> <th>Unregulated charities</th> <th>EDD on a risk based approach</th>	30 v	Unregulated charities	EDD on a risk based approach
30 y Other (specify) 31 lif restricted, provide details of the restriction 6. 32 loops the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity? Yes 33 what is the method used by the Entity to monitor transactions for suspicious activities? Combination of automated and manual 34 of transactions are monitored manually Complex transactions 34 of transactions are monitored manually Yes 34 processes to comply with suspicious transactions? Yes 35 processes to comply with suspicious transactions reporting requirements? Yes 36 Does the Entity have policies, procedures and processes to review and scalate matters arising from the monitoring of customer transactions and activity? Yes 36 Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: No 37 Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: No 37 B Local Regulations No 37 D Local Regulations No 37 D Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: No 37 B Local Regulations No 37 B Local Regulations No 37 B Does the Entity have a Sanctions	30 w	Used Car Dealers	Do not have this category of customer or industry
31 If restricted, provide details of the restriction 6. MONITORING & REPORTING 20 Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activities? Yes 33 What is the method used by the Entity to monitor transactions for suspicious activities? Combination of automated and manual 33 If manual or combination selected, specify what type of transactions are monitored manually Combination selected, specify what type of transactions are monitored manually 34 Does the Entity have policies, procedures and processes to comply with suspicious transactions Yes 35 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Yes 7 PAYMENT TRANSPARENCY So bes the Entity adhere to the Wolfsberg Group Payment Transparency Standards? No 37 FATF Recommendation 16 No So 2000000000000000000000000000000000000	30 x	Virtual Asset Service Providers	Do not have this category of customer or industry
31 If restricted, provide details of the restriction 6. MONITORING & REPORTING 20 Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activities? Yes 33 What is the method used by the Entity to monitor transactions for suspicious activities? Combination of automated and manual 33 If manual or combination selected, specify what type of transactions are monitored manually Combination selected, specify what type of transactions are monitored manually 34 Does the Entity have policies, procedures and processes to comply with suspicious transactions Yes 35 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Yes 7 PAYMENT TRANSPARENCY So bes the Entity adhere to the Wolfsberg Group Payment Transparency Standards? No 37 FATF Recommendation 16 No So 2000000000000000000000000000000000000	30 y	Other (specify)	
6. MONITORING & REPORTING Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity? Yes 33 What is the method used by the Entity to monitor transactions for suspicious activities? Combination of automated and manual dompia transactions are monitored manually 34 If manual or combination selected, specify what type of transactions are monitored manually Complex transactions 35 If a combination selected, specify what type of transactions are monitored manually Complex transactions 34 If Y, does the Entity have regulatory requirements to report rung requirements? Yes 36 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Yes 7 Does the Entity hadhere to the Wolfsberg Group Payment Transparency Standards? No 37 Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: No 37 If Y, Specify the regulation 37 No 37 If Y, specify the regulation 37 No 37 If N, explain As asset management company, no payment service provided 8 38 SANCTIONS No			
Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity? Yes 33 What is the method used by the Entity to monitor transactions for suspicious activities? Combination of automated and manual of transactions are monitored manually 34 Dees the Entity have regulatory requirements to of transactions are monitored manually Complex transactions 34 Does the Entity have policies, procedures and processes to comply with suspicious transactions Yes 34 processes to comply with suspicious transactions reporting requirements? Yes 36 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Yes 37 Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: No 37 FATF Recommendation 16 No 37.1 If Y, Specify the regulation Xes 37 If Y, Specify the regulation Xes 37.1 If Y, specify the regulation Xes 38 applicable to the Bub thank controls in place to ensure compliance with: No 37.1 If Y, specify the regulation Xes <th></th> <th></th> <th></th>			
32 and monitoring processes for the identification and reporting of supplicus activity? Yes 33 What is the method used by the Entity to monitor transactions for supplicus activitites? Combination of automated and manual 33 If manual or combination selected, specify what type of transactions are monitored manually Complex transactions 34 If manual or combination selected, specify what type of transactions Complex transactions 34 If manual or combination selected, specify what type of transactions Yes 35 of transactions activity? Yes 34 processes to comply with suspicious transactions and activity? Yes 36 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Yes 37 PAYMENT TRANSPARENCY Social Section Sectin Section Sectin Section Section Section Sec	••••••		
reporting of suspicious activity? Combination of automated and manual 33 What is the method used by the Entity to monitor transactions for suspicious activities? Combination of automated and manual 34 If manual or combination selected, specify what type of transactions are monitored manually. Complex transactions 34 Does the Entity have regulatory requirements to report suspicious transactions? Yes 184, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements? Yes Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Yes 7. PAYMENT TRANSPARENCY Soes the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: No 37 FATF Recommendation 16 No 37. If N, explain As asset management company, no payment service provided 8. SAANCTIONS No Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? Yes Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect ations taken to evade applicable sanctio	22		Vaa
33 What is the method used by the Entity to monitor transactions for suspicious activities? Combination of automated and manual 33 a If manual or combination selected, specify what type of transactions are monitored manually and processes to compluate requirements to report suspicious transactions? Complex transactions 34 a Does the Entity have regulatory requirements to report suspicious transactions procedures and processes to comply with suspicious transactions reporting requirements? Yes 35 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Yes 7 PAYMENT TRANSPARENCY No 36 Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: No 37 a FATE Recommendation 16 No 37 b If Y, Specify the regulation As asset management company, no payment service provided 8. SANCTIONS Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? No 39 applicable to the Entity have a Sanctions relevant information in cross border transactions? No 39 beneficial ownership information collecte	52		Tes
33 transactions for suspicious activities? Combination of automated and manual 33 a if manual or combination selected, specify what type of transactions are monitored manually Complex transactions 34 Does the Entity have regulatory requirements to report suspicious transactions? Yes 16 if , does the Entity have policies, procedures and processes to comply with suspicious transactions are reporting requirements? Yes Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Yes 7. PAVMENT TRANSPARENCY See the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: No 37 processes to comply with and have controls in place to ensure compliance with: No 37 processes to comply with and have controls in place to ensure compliance with: No 37 bit If Y, Specify the regulation 3 No 37 bit See the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? Yes 38 applicable to the Entity, including with threspect to its business conducted with, or through accounts held at foreign financial institutions? No 39 Does the Entity have policies, procedures or other controls reasonaby d		· · ·	
It ransactions for subpicious activities? Complex transactions 33 af If manual or combination selected, specify what type of transactions are monitored manually. Complex transactions 34 a Does the Entity have regulatory requirements to report suspicious transactions? Yes 14 a processes to comply with suspicious transactions and activity? Yes 25 processes to review and escalate matters aring from the monitoring of customer transactions and activity? Yes 26 Payment Transparency Standards? No 37 processes to comply with and have controls in place to ensure compliance with: No 37 processes to comply with and have controls in place to ensure compliance with: No 37 Local Regulations No 37 b T, Specify the regulation 37 Local Regulations No 38 applicable to the Entity have a Sanctions Policy approved by management regarding compliance with: and/or detect actions taken to evade applicable sanctions and activitions and activitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? No 39 Does the Entity have a Sanctions Policy approved by therefinal negative policies, proceedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions and activities? Yes 30 Does the Entity have a Sanctions relevant info	33		Combination of automated and manual
33 a of transactions are monitored manually Complex transactions 34 Does the Entity have regulatory requirements to report supplicibus transactions? Yes 34 a if Y, does the Entity have policies, procedures and processes to comply with suspicious transactions and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Yes 7. PAYMENT TRANSPARENCY Yes 36 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? No 7. PAYMENT TRANSPARENCY Yes 36 Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: No 37 a FATF Recommendation 16 No 37 b Local Regulations No 37 c If N, spelpin As asset management company, no payment service provided 8. SANCTIONS Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? Yes 9 Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable stractions? Yes 9 </th <th></th> <th></th> <th></th>			
of transactions are monitored manually report suspicious transactions? 34 Does the Entity have policies, procedures and processes to comply with suspicious transactions? Yes 35 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Yes 7 PAYMENT TRANSPARENCY Yes 36 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? No 37 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? No 37 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? No 36 Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: No 37 FATR Recommendation 16 No No 37.1 If Y, specify the regulation As asset management company, no payment service provided 8. SANCTIONS Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial instudied. Yes 38 applicable to the Entity, including with respect to its business conducted with, or through accounts held a	33 a		Complex transactions
34 report suspicious transactions? Yes 11 ⁷ , does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements? Yes 35 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Yes 7. PAYMENT TRANSPARENCY Yes 36 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? No 37 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? No 36 Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: No 37 FATR Recommendation 16 No No 37.0 If Y, specify the regulation No 37.1 If Y, specify the regulation As asset management company, no payment service provided 8. SANCTIONS Does the Entity have a Sanctions Policy approved by wanagement regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial instudied applicable sanctions and/or detect actions? Yes 39 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Usts? Ye			
report suspicious transactions? IF Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements? Dees the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 36 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? 37 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? 38 aprocesses to comply with and have controls in place to ensure compliance with: 37 EATF Recommendation 16 No 37. Local Regulations No 37. Local Regulations No 37. If N, explain As asset management company, no payment service provided 8. SANCTIONS Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? Yes 39 Does the Entity have policies applicable sanctions relevant information in cross border transactions? No 39 business conducted with, or through accounts held at foreign financial institutions? No 30 Boes the Entity have policies applicable sanctions relevant information in cross border transactions?	34	Does the Entity have regulatory requirements to	Yes
34 a processes to comply with suspicious transactions reporting requirements? Yes 35 Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Yes 7. PAYMENT TRANSPARENCY Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? No 36 Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: No 37 a FATF Recommendation 16 No 37 b Local Regulations No 37 c If N, specify the regulation As asset management company, no payment service provided 8. SANCTIONS Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? No Does the Entity save a Sanctions relevant information in cross border transactions? No 9 Does the Entity save no tick applicable sanctions and/or masking, of sanctions celevant information in cross border transactions? No 40 beneficial ownersity information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists veed by the Entity in its sanctions screening processes: Used for screening customers and beneficial owners (i.e. reference	J+		
reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Yes 7. PAYMENT TRANSPARENCY No 36 Does the Entity dahere to the Wolfsberg Group Payment Transparency Standards? No 7. porcesses to comply with and have controls in place to ensure compliance with: No 37 a FATF Recommendation 16 No 37 b Loal Regulations No 37 bL Cal Regulations No Sasset management company, no payment service provided 8. SANCTIONS Sasset management company, no payment service provided Sasset management company, no payment service provided 9. Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law Yes 9. Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law Yes 9. Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law Yes 9. Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions transactions? No 9. Does the Entity screen its customers, including benchibit and/or detect actions taken to evade applicable sanctions prolubit and/or detect actions tactions Lists? No <td< th=""><th></th><th>If Y, does the Entity have policies, procedures and</th><th></th></td<>		If Y, does the Entity have policies, procedures and	
reporting requirements? Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Yes 7. PAYMENT TRANSPARENCY No 36 Does the Entity dahere to the Wolfsberg Group Payment Transparency Standards? No 7. porcesses to comply with and have controls in place to ensure compliance with: No 37 a FATF Recommendation 16 No 37 b Loal Regulations No 37 bL Cal Regulations No Sasset management company, no payment service provided 8. SANCTIONS Sasset management company, no payment service provided Sasset management company, no payment service provided 9. Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law Yes 9. Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law Yes 9. Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law Yes 9. Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions transactions? No 9. Does the Entity screen its customers, including benchibit and/or detect actions taken to evade applicable sanctions prolubit and/or detect actions tactions Lists? No <td< th=""><th>34 a</th><th>processes to comply with suspicious transactions</th><th>Yes</th></td<>	34 a	processes to comply with suspicious transactions	Yes
Joes the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? Yes 7. PAYMENT TRANSPARENCY Joes the Entity adhere to the Wolfsberg Group Payment Transparency Standards? No 36 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? No 37 Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: No 37 ATF Recommendation 16 No 37 b1 Local Regulations No 37 b1 If Y, Specify the regulation No 37 c If N, explain As asset management company, no payment service provided 8 SANCTIONS Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? Yes 90 Does the Entity screen its customers, including be entity and policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions or prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? No 40 beeneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctio			
35 processes to review and escalate matters arising from the monitoring of customer transactions and activity? Yes 7. PAYMENT TRANSPARENCY 5 36 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? No 37 Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: No 37 a FATF Recommendation 16 No 37 b1 Local Regulations No 37 b1 If Y, specify the regulation Sastemanagement company, no payment service provided 8. SANCTIONS Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? Yes 9 Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions promision and/or masking, of sanctions relevant information in cross border transactions? No 40 beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? Yes 41 Select the Sanctions Lists used by the Entity in its sanctions screening processes: Used for screening customers and beneficial owners (i.e. referenced data) 11h Unite			
the monitoring of customer transactions and activity? 7. PAYMENT TRANSPARENCY 36 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? No 37 Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: No 37 a FATF Recommendation 16 No 37 b Local Regulations No 37 b1 If Y, Specify the regulation As asset management company, no payment service provided 8. SANCTIONS Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? Yes Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? Yes Does the Entity reven its customers, including beneficial ownership information collected by the Entity, during obsoarding and regularly thereafter against Sanctions List? No 40 Entertity Sanctions List? Yes 41 Consolidated United Nations Security Council Sanctions screening processes: Used for screening customers and beneficial owners (i.e. referenced data) 41 United			
7. PAYMENT TRANSPARENCY 36 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? No 37 Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: No 37 a FATF Recommendation 16 No 37 b Local Regulations No 37 b1 If Y, Specify the regulation As asset management company, no payment service provided 8. SANCTIONS Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? Yes Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect adions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? No 40 Entity, during onboarding and regularly thereafter against Sanctions Lists ? Yes 41 Select the Sanctions Security Council Sanctions List (UN) Used for screening customers and beneficial owners (i.e. reference data) 41 Sanctions List (UN) United States Department of the Treasury's Office of Local data Used for screening customers and beneficial owners (i.e. reference	35	processes to review and escalate matters arising from	Yes
36 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? No 37 Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: No 37 FATF Recommendation 16 No 37 b Local Regulations No 37 b1 If Y, Specify the regulation As asset management company, no payment service provided 8. SANCTIONS Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? Yes Does the Entity have a policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? No 40 Entity, during onboarding and regularly thereafter against Sanctions Lists? Yes 41 Select the Sanctions Lists used by the Entity in its sanctions screening processes: Used for screening customers and beneficial owners (i.e. reference data) 41 Consolidated United Nations Security Council Sanctions Lists (UN) Used for screening customers and beneficial owners (i.e. reference data)		the monitoring of customer transactions and activity?	
36 Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards? No 37 Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: No 37 FATF Recommendation 16 No 37 b Local Regulations No 37 b1 If Y, Specify the regulation As asset management company, no payment service provided 8. SANCTIONS Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? Yes Does the Entity have a policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? No 40 Entity, during onboarding and regularly thereafter against Sanctions Lists? Yes 41 Select the Sanctions Lists used by the Entity in its sanctions screening processes: Used for screening customers and beneficial owners (i.e. reference data) 41 Consolidated United Nations Security Council Sanctions Lists (UN) Used for screening customers and beneficial owners (i.e. reference data)	7 04		
36 Payment Transparency Standards? No 37 Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: No 37 a FATF Recommendation 16 No 37 b Local Regulations No 37 c If Y, specify the regulation As asset management company, no payment service provided 8. SANCTIONS Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? Yes Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? No Does the Entity during onboarding and regularly thereafter against Sanctions Lists? Yes 41 Select the Sanctions Lists used by the Entity in its sanctions screening processes: Used for screening customers and beneficial owners (i.e. reference data) 41 United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. reference data)	7. PA		
Payment Transparency Standards? Does the Entity have policies, procedures and processes to comply with and have controls in place to ensure compliance with: 37 a FATF Recommendation 16 No 37 b Local Regulations No 37 b1 If Y, Specify the regulation No 37 b1 If N, explain As asset management company, no payment service provided 8. SANCTIONS Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? Yes Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? No 0 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? Yes 41 Select the Sanctions Lists used by the Entity in its sanctions List (UN) Used for screening customers and beneficial owners (i.e. reference data) 41 Consolidated United Nations Security Council Sanctions List (UN) Used for screening customers and beneficial owners (i.e. reference data)	36		No
 37 processes to comply with and have controls in place to ensure compliance with: 37 a FATF Recommendation 16 No 37 b Local Regulations No 37 b Local Regulations 37 c If N, explain As asset management company, no payment service provided 8. SANCTIONS Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions and/or masking, of sanctions relevant information in cross border transactions? Does the Entity screen its customers, including beneficial owners in the customers and beneficial owners (i.e. reference against Sanctions Lists used by the Entity in its sanctions Lists? 41 Select the Sanctions Security Council Used for screening customers and beneficial owners (i.e. reference data) 41 United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. reference data) 			
ensure compliance with: No 37 a FATF Recommendation 16 No 37 b Local Regulations No 37 b1 If Y, Specify the regulation As asset management company, no payment service provided 8. SANCTIONS SANCTIONS B0es the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? Yes B0es the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? No 40 beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? Yes 41 Select the Sanctions Lists used by the Entity in its sanctions screening processes: Sanctions List (UN) 41 a Consolidated United Nations Security Council Sanctions Soft Soft Soft Soft Soft Soft Soft Soft			
37 a FATF Recommendation 16 No 37 b Local Regulations No 37 b1 If Y, Specify the regulation As asset management company, no payment service provided 37 c If N, explain As asset management company, no payment service provided 8. SANCTIONS Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? Yes Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? No 40 beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists used by the Entity in its sanctions screening processes: Yes 41 Consolidated United Nations Security Council Sanctions List (UN) Used for screening customers and beneficial owners (i.e. referenced data) 41 b United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. referenced data)	37		
37 b Local Regulations No 37 b1 If Y, Specify the regulation As asset management company, no payment service provided 8. SANCTIONS Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? Yes Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? No 40 Does the Entity successe: against Sanctions Lists? Yes 41 Select the Sanctions Lists? Yes 41 a Consolidated United Nations Security Council Sanctions Istist (UN) Used for screening customers and beneficial owners (i.e. reference data) 41 b United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. reference data)			
37 b1 If Y, Specify the regulation 37 c If N, explain 37 c If N, explain 8. SANCTIONS Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? No 40 beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? Yes 41 Select the Sanctions Lists used by the Entity in its sanctions us creening processes: Used for screening customers and beneficial owners (i.e. reference data) 41 a Consolidated United Nations Security Council Sanctions List UN) Used for screening customers and beneficial owners (i.e. reference data)		FATF Recommendation 16	No
37 c If N, explain As asset management company, no payment service provided 8. SANCTIONS Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? Yes 9 Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? No 40 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? Yes 41 Select the Sanctions Lists used by the Entity in its sanctions screening processes: Used for screening customers and beneficial owners (i.e. reference data) 41 b United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. reference data)	37 b	Local Regulations	No
8. SANCTIONS Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? 38 Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? No 40 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? Yes 41 Select the Sanctions Lists used by the Entity in its sanctions screening processes: Used for screening customers and beneficial owners (i.e. reference data) 11 United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. reference data)	37 b1	If Y, Specify the regulation	
Joes the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?YesJoes the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?NoJoes the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists ?NoJant Select the Sanctions Lists used by the Entity in its sanctions List (UN)Used for screening customers and beneficial owners (i.e. reference data)Jant United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. reference data)	37 с	If N, explain	As asset management company, no payment service provided
Joes the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions?YesJoes the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions?NoJoes the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists ?NoJant Select the Sanctions Lists used by the Entity in its sanctions List (UN)Used for screening customers and beneficial owners (i.e. reference data)Jant United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. reference data)	8. SA	NCTIONS	
 management regarding compliance with sanctions law applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? Select the Sanctions Lists used by the Entity in its sanctions screening processes: Consolidated United Nations Security Council Sanctions List (UN) United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. reference data) 			
 applicable to the Entity, including with respect to its business conducted with, or through accounts held at foreign financial institutions? Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? Select the Sanctions Lists used by the Entity in its sanctions screening processes: Consolidated United Nations Security Council Sanctions List (UN) United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. referenced data) 			
business conducted with, or through accounts held at foreign financial institutions? Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? No 40 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? Yes 41 Select the Sanctions Lists used by the Entity in its sanctions screening processes: Used for screening customers and beneficial owners (i.e. reference data) 41 a Consolidated United Nations Security Council Sanctions List (UN) Used for screening customers and beneficial owners (i.e. reference data)	20		Voc
foreign financial institutions? Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? No 40 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? Yes 41 Select the Sanctions Lists? Used for screening customers and beneficial owners (i.e. reference data) 41 a Consolidated United Nations Security Council Sanctions List (UN) Used for screening customers and beneficial owners (i.e. reference data)	30		163
 Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? Select the Sanctions Lists used by the Entity in its sanctions screening processes: Consolidated United Nations Security Council Sanctions List (UN) United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. referenced data) 		_	
 controls reasonably designed to prohibit and/or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? Select the Sanctions Lists used by the Entity in its sanctions screening processes: Consolidated United Nations Security Council Sanctions List (UN) United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. referenced data) 			
 actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? Select the Sanctions Lists used by the Entity in its sanctions screening processes: Consolidated United Nations Security Council Sanctions List (UN) United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. reference data) 			
 prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? Select the Sanctions Lists used by the Entity in its sanctions screening processes: Consolidated United Nations Security Council Sanctions List (UN) United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. reference data) 			
 prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? Select the Sanctions Lists used by the Entity in its sanctions screening processes: Consolidated United Nations Security Council Sanctions List (UN) United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. reference data) 	39		No
cross border transactions? Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? 40 Select the Sanctions Lists used by the Entity in its sanctions screening processes: 41 Consolidated United Nations Security Council Sanctions List (UN) 41 b United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. referenced data)		prohibitions, such as stripping, or the resubmission	
40 Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? Yes 41 Select the Sanctions Lists used by the Entity in its sanctions screening processes: Yes 41 a Consolidated United Nations Security Council Sanctions List (UN) Used for screening customers and beneficial owners (i.e. reference data) 41 b United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. reference data)		and/or masking, of sanctions relevant information in	
40 beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? Yes 41 Select the Sanctions Lists used by the Entity in its sanctions screening processes: Ves 41 a Consolidated United Nations Security Council Sanctions List (UN) Used for screening customers and beneficial owners (i.e. reference data) 41 b United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. reference data)		cross border transactions?	
40 Entity, during onboarding and regularly thereafter against Sanctions Lists? Yes 41 Select the Sanctions Lists used by the Entity in its sanctions screening processes: Select the Sanctions Lists used by the Entity in its sanctions screening processes: 41 a Consolidated United Nations Security Council Sanctions List (UN) Used for screening customers and beneficial owners (i.e. reference data) 41 b United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. reference data)	40	Does the Entity screen its customers, including	
40 Entity, during onboarding and regularly thereafter against Sanctions Lists? Yes 41 Select the Sanctions Lists used by the Entity in its sanctions screening processes: Select the Sanctions Lists used by the Entity in its sanctions screening processes: 41 a Consolidated United Nations Security Council Sanctions List (UN) Used for screening customers and beneficial owners (i.e. reference data) 41 b United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. reference data)			N
against Sanctions Lists? 41 Select the Sanctions Lists used by the Entity in its sanctions screening processes: 41 a Consolidated United Nations Security Council Sanctions List (UN) 41 b United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. referenced data)			Yes
41 Select the Sanctions Lists used by the Entity in its sanctions screening processes: 41 a Consolidated United Nations Security Council Sanctions List (UN) Used for screening customers and beneficial owners (i.e. reference data) 41 b United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. reference			
41 sanctions screening processes: 41 a Consolidated United Nations Security Council Sanctions List (UN) Used for screening customers and beneficial owners (i.e. reference data) 41 b United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. reference			
41 a Consolidated United Nations Security Council Sanctions List (UN) Used for screening customers and beneficial owners (i.e. reference data) 41 b United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. reference	41		
41 a Sanctions List (UN) data) 41 b United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. reference)			
United States Department of the Treasury's Office of Used for screening customers and beneficial owners (i.e. reference	41 a		
			,
L Foreign Assets Control (OEAC)	41 b		
	-	Foreign Assets Control (OFAC)	data)

41 c	Office of Financial Sanctions Implementation HMT	Used for screening customers and beneficial owners (i.e. reference		
	(OFSI)	data) Used for screening customers and beneficial owners (i.e. reference		
41 d	European Union Consolidated List (EU)	data)		
41 e	Lists maintained by other G7 member countries	Used for screening customers and beneficial owners (i.e. reference data)		
41 f	Other (specify)	Any other list as it may be requiered by relevant local regulations		
	Does the Entity have a physical presence, e.g.			
	branches, subsidiaries, or representative offices	N		
42	located in countries/regions against which UN, OFAC,	No		
	OFSI, EU and G7 member countries have enacted			
9 ТР	comprehensive jurisdiction-based Sanctions? AINING & EDUCATION			
5. IK	Does the Entity provide mandatory training, which			
43	includes :			
43 a	Identification and reporting of transactions to	Yes		
	government authorities			
12 F	Examples of different forms of money laundering,	Vac		
43 b	terrorist financing and sanctions violations relevant for the types of products and services offered	Yes		
	Internal policies for controlling money laundering,			
43 с	terrorist financing and sanctions violations	Yes		
40 ·	New issues that occur in the market, e.g. significant	No.		
43 d	regulatory actions or new regulations	Yes		
44	Is the above mandatory training provided to :			
44 a	Board and Senior Committee Management	Yes		
44 b	1st Line of Defence	Yes		
44 c	2nd Line of Defence	Yes		
44 d	3rd Line of Defence	No		
44 e	Third parties to which specific FCC activities have been outsourced	No		
44 f	Non-employed workers (contractors/consultants)	Yes		
	UDIT			
	In addition to inspections by the government			
	supervisors/regulators, does the Entity have an			
45	internal audit function, a testing function or other	Yes		
	independent third party, or both, that assesses FCC			
	AML, CTF, ABC, Fraud and Sanctions policies and			
	practices on a regular basis?			
Signat				
JIGHAT	ure Page			
Wolfsk	perg Group Financial Crime Compliance Questionnaire 2022 (FCCQ V1.2)		
ELLIPS	SIS AM	(Financial Institution name)		
I, SEBASTIEN CARON, Chairman of the Management Board, certify that I have read and understood this				
declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.				
12/01/24 (Signature & Date)				
(Signature & Date)				