

EXTERNAL ASSET MANAGER QUESTIONNAIRE

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SG Kleinwort Hambros Group of Companies

Throughout this External Asset Manager Questionnaire, all references to Kleinwort Hambros shall be construed as references to the Kleinwort Hambros location you have selected.

Booking centres required:

UK Jersey Guernsey Gibraltar

USING THIS FORM

- Please complete all sections of this form with as much detail as possible.
- Where the available space is insufficient for your answer, please continue on a separate sheet.

Full legal name of Regulated Company/ Partnership	
Trading name if different	
Legal Entity Identifier (LEI)	

CONTACT DETAILS

Primary contact name and role within the Company/Partnership	
Primary contact email and telephone	
Registered office address	
	Postcode
Business address (if different)	
	Postcode
Telephone	
Company email	
Website	

DETAILS OF ALL DIRECTORS

Full name	
Role	
Home address	
	Postcode
Email	
Date of birth	DD / MM / YYYY

Full name	
Role	
Home address	
	Postcode
Email	
Date of birth	DD / MM / YYYY

Full name	
Role	
Home address	
	Postcode
Email	
Date of birth	DD / MM / YYYY

Please print and complete further copies of this page if needed

ULTIMATE BENEFICIAL OWNER/PARTNER DETAILS

Full name	
Role within the Company/Partnership	
Ultimate Beneficial Ownership %	
Home address	
	Postcode
Date of birth	DD / MM / YYYY

Full name	
Role within the Company/Partnership	
Ultimate Beneficial Ownership %	
Home address	
	Postcode
Date of birth	DD / MM / YYYY

Full name	
Role within the Company/Partnership	
Ultimate Beneficial Ownership %	
Home address	
	Postcode
Date of birth	DD / MM / YYYY

Please print and complete further copies of this page if needed

KEY PERSON DETAILS

	Money Laundering Reporting Officer	Money Laundering Compliance Officer (if applicable)
Name		
Email		
Telephone		

GROUP STRUCTURE

Please provide a summary of the Company/Partnership corporate structure, up to and including the ultimate beneficial owners.

SCOPE AND SCALE OF EXTERNAL ASSET MANAGER ACTIVITIES

Where the available space is insufficient for your answer, please continue on a separate sheet

Please confirm the jurisdictions where you have a physical business presence	
Based on the jurisdictions where you have a physical business presence, please confirm if you are regulated in each of these jurisdictions, and by whom	
Please confirm if you are regulated in any other jurisdictions where you do not have a physical business presence	
In the jurisdictions where you are regulated, please confirm your regulatory licence numbers and your regulatory permissions	
Have any former Societe Generale Group staff been appointed as employees, board members or shareholders in the last 5 years? If yes, please provide details	Yes <input type="checkbox"/> No <input type="checkbox"/>
Please confirm how many people you employ locally and globally (if applicable)?	
Please confirm the products and services that you offer?	

CLIENT BASE

Please provide a breakdown of your client base, split by their financial crime risk rating	
Total assets under management (GBP)	
Total number of clients	
What percentage of your existing client base would be considered a Politically Exposed Person (PEP)?	

SCOPE AND SCALE OF EXTERNAL ASSET MANAGER ACTIVITIES

CLIENT BASE CONTINUED

Please list the top 5 countries by the number of clients and then the total Assets Under Management (AUM) associated with this country.

Country	Number of clients	AUM (GBP)
1.		
2.		
3.		
4.		
5.		

Where the available space is insufficient for your answer, please continue on a separate sheet

General client nature (for example, trusts, corporates, funds, private clients etc.)	
How do you rate your risk appetite on a scale of 1-10? (0 = risk averse, 10 = risk hungry)	
Please provide comments to support this risk rating (for example, high risk industries, crypto currency and NFTs, sanctioned clients and exposure to sanctioned countries, environmental and social impact, high profile clients etc.)	
Please confirm if you have had any Regulatory visits. If you have had any Regulatory visits, please confirm the date of the last visit, the scope of the review, and the key findings	
Please confirm if you are looking to expand into any new markets in the next 1-2 years	
Please confirm if you are looking to expand your product range or perform any new regulated activities in the next 1-2 years	

SANCTIONS AND EMBARGOES QUESTIONNAIRE

FOR EXTERNAL ASSET MANAGERS

The sanctions due diligence information must be provided by a senior officer with sufficient knowledge of the entity's global operations in order to respond appropriately (e.g., CFO, CEO, Compliance Officer, General Counsel, etc.). For Banks or Money Services Business, this questionnaire must be signed by an authorised person within your organisation (e.g. a senior representative of an independent control function, such as Compliance, Legal, or Audit).

Questionnaire

Preliminary Question

Does the client (and any entity concerned by this questionnaire) conduct international activity* ? Yes No

If the answer is "no", there is no requirement to complete the questions below.

1. Are you or any of your subsidiaries, affiliates, joint ventures, directors or officers the target of any economic or financial sanctions administered by the UN, the EU, HMT OFSI (Her Majesty's Treasury – Office of Financial Sanctions Implementation), OFAC (Office of Foreign Assets Control), or pursuant to jurisdiction-specific sanctions regimes applicable to the places you are located or operating from? Yes No

a) If "yes", please provide details.

2. Are you or any of your subsidiaries, affiliates, or joint ventures located within or operating from any of the following countries and regions?:

a) Countries: Afghanistan, Belarus, Burma/Myanmar, Burundi, Central African Republic, Cuba, Democratic Republic of Congo, Egypt, Eritrea, Iraq, Lebanon, Libya, North Korea, Republic of Guinea, Republic of Guinea-Bissau, Russia, Somalia, Sudan, South Sudan, Syria, Tunisia, Venezuela, Yemen or Zimbabwe Yes No

b) Regions: Crimea, Donetsk People's Republic, Luhansk People's Republic or Sevastopol Region Yes No

3. Are you or any of your subsidiaries, affiliates, or joint ventures engaged in transactions, investments, business, or other dealings that directly or indirectly involve or benefit any Sanctioned Countries or any person or entity which is the target of any sanctions ("Sanctioned Persons")? Yes No

4. Do you or any of your companies¹ or Trusts connected to you have any investments, business or other dealings in Oil, Gas, Military and/or banking sectors in Russia? Yes No

*Depending on client type "international activity" could include, but is not limited to: conducting cross-border business, having subsidiaries/branches/representative offices outside of your country of incorporation, using suppliers that are based abroad, selling goods internationally, using intermediaries abroad, owning properties abroad, owning assets abroad etc.

¹ "Companies" means any legal entity (including any subsidiaries, branches, joint ventures) in which you hold directly or indirectly more than 10% of the share capital or the voting rights.

SANCTIONS AND EMBARGOES QUESTIONNAIRE

FOR EXTERNAL ASSET MANAGERS CONTINUED

5. If the answer to Question 2, 3 or 4 is “yes”, the list of subsidiaries or joint ventures concerned must be provided and the following questions must be answered for each of those entities if they have a relationship with Kleinwort Hambros (including the client itself).

a) Please explain and detail what percentage of sales and/or purchases involve each Sanctioned Country or Sanctioned Person.

b) Please explain if there is an intention to expand the scope of this activity.

c) Please confirm that you will not directly or indirectly use any Kleinwort Hambros account, relationship, or service to conduct, facilitate, or route any funds related to activity with any countries subject to US comprehensive sanctions or Sanctioned Person.

d) Please explain the controls that you have in place to ensure the activity related to any countries subject to US comprehensive sanctions or Sanctioned Person does not directly or indirectly involve any Kleinwort Hambros account, relationship, or service.

NEW CLIENT PROCEDURES

Where the available space is insufficient for your answer, please continue on a separate sheet

Please describe your process for verifying the identify and address of your client(s), and their beneficial owner(s) and principal(s).

Please include details of tools used for screening for sanctions, PEPs and negative news, including the frequency that screening is conducted.

Please describe your process for verifying the source of wealth and business activities of your client(s), and their beneficial owner(s) and principal(s).

Please describe your process for verifying the source of funds for your clients.

NEW CLIENT PROCEDURES

Where the available space is insufficient for your answer, please continue on a separate sheet

Please outline the risk levels used to assess clients and how these risk levels are determined.

Please describe the enhanced due diligence and ongoing monitoring measures that you apply to your higher risk and PEP clients (if applicable). *Please indicate if the procedures for PEPs are different.*

Please be advised that Kleinwort Hambros is only able to accept business from Financial Intermediaries that collect and hold client due diligence. *Please confirm if this is the case and that you do not rely on due diligence gathered and held by any other third party or financial services business.*

Yes No

With regard to Investment Advice, please outline the measures that you take to assess Suitability, Appropriateness, Investment Risk Rating and Risk Appetite, including where clients are located in a non-MIFID country.

Please confirm if you outsource any business critical functions, if you do, please provide details including jurisdiction and any business continuity measures in place. Please provide details of oversight and monitoring controls in place.

ONGOING MONITORING PROCEDURES

Where the available space is insufficient for your answer, please continue on a separate sheet

Please outline the arrangements you have in place to undertake ongoing screening and client reviews, to ensure any changes in their circumstances and risk profile are identified and enhanced due diligence measures taken where applicable.

Please describe the measures you take to ensure that documents, data and information obtained under identification measures are kept up to date and relevant.

Please outline your process for managing customer complaints, and how many complaints were received in the last 12 months.

ONGOING MONITORING PROCEDURES

Where the available space is insufficient for your answer, please continue on a separate sheet

Please outline the policies and procedures you have in place to ensure that cross-border rules and regulations are adhered to.

COMPLIANCE FRAMEWORK

Please tick the relevant boxes below to indicate which of the following you have in place:

- | | |
|--|--------------------------|
| Bribery and Corruption policies and procedures | <input type="checkbox"/> |
| – Cross-border policies and procedures | <input type="checkbox"/> |
| – Anti-Money Laundering and Counter-Terrorist Financing policies and procedures | <input type="checkbox"/> |
| Code of Ethics/Conduct | <input type="checkbox"/> |
| – A regular training and competence programme required by a regulator or professional body | <input type="checkbox"/> |
| – Professional indemnity insurance | <input type="checkbox"/> |
-

Please confirm that you have appropriate prevention procedures in place as required under the Corporate Criminal Offence of Failure to Prevent the Facilitation of Tax Evasion (Part 3 of the Criminal Finances Act 2017) and you will immediately notify Kleinwort Hambros of any concerns filed in relation to this offence to the extent that such report relates to services rendered to Kleinwort Hambros.

ONGOING MONITORING PROCEDURES

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BANK ACCOUNT INFORMATION

THE COMPANY'S/PARTNERSHIPS CURRENT BANK ACCOUNT

Please provide details of the main bank account of the Company/Partnership

Name of bank		
Address of bank		
Postcode		
Account number ■ ■ ■ ■ ■ ■ ■ ■ ■ ■	Roll number (if applicable) ■ ■ ■ ■ ■ ■ ■ ■ ■ ■	Sort code or equivalent ■ ■ ■ - ■ ■ ■ - ■ ■ ■

CONFIDENTIALITY AND DATA PROTECTION

The following sections shall apply until formal written agreements are entered into between us.

DISCLOSURE OF INFORMATION

We will keep all information provided within this form confidential, save as set out below.

We may disclose confidential information to any other companies which are at the time of disclosure in the Societe Generale Group. We (or they) may disclose confidential information to third parties who provide services to us (or them) or that act as our (or their) agents (or prospective third party service providers or prospective agents). We, or the relevant member of the Societe Generale Group, will take all reasonable steps to ensure that the service provider or agent is subject to appropriate confidentiality requirements.

We may also disclose confidential information in the following circumstances:

- (a) to any court of any relevant jurisdiction, tribunal, mediator or arbitrator or any regulatory authority or taxation authority;
- (b) if we or any person to whom your information is disclosed have a right or duty to disclose it or are permitted (acting reasonably) or compelled by applicable laws or regulations or if we or any person to whom your information is disclosed wishes (acting reasonably) to share the information with other financial institutions to assist in the prevention of terrorism, money laundering, tax evasion, and other crimes;
- (c) to law enforcement agencies and/or fraud prevention agencies;
- (d) to our agents, auditors, service providers, and professional advisers (and those agents, auditors, service providers and professional advisers of other Societe Generale Group companies) to enable them to perform their obligations;
- (e) to insurers and information providers;
- (f) otherwise if you consent to such disclosure.

PRIVACY NOTICE

Personal data will be processed by Kleinwort Hambros as a data controller in accordance with the Privacy Notice – Third Parties which is available on our website at: www.kleinworthambros.com/en/important-information/.

DECLARATION

By signing this declaration:

- I/We confirm that all the details and supporting documentation provided by me/us within or in connection with this External Asset Manager Questionnaire are true and correct to the best of my/our knowledge and belief;
- I/We agree that I/we will promptly inform Kleinwort Hambros in the event that there are any changes to the details and/or supporting documentation I/we have provided or other changes that may be relevant to this External Asset Manager Questionnaire;
- I/We also agree to provide Kleinwort Hambros with all further or updated information and documentation as it may, from time to time, reasonably request from me/us in connection with this External Asset Manager Questionnaire; and
- I/We acknowledge that the personal data provided in this form may be used in the ways set out in the Privacy Notice – Third Parties.

External Asset Manager – Authorised Signatory

Signature

Please print name in full

Position

Date

DD / MM / YYYY

External Asset Manager – Authorised Signatory

Signature

Please print name in full

Position

Date

DD / MM / YYYY

SG Kleinwort Hambros Bank Limited

One Bank Street, Canary Wharf
London E14 4SG
T +44 20 7597 3000
F +44 20 7597 3456

SG Kleinwort Hambros Bank Limited

Jersey Branch

PO Box 78, SG Hambros House
18 Esplanade, St Helier
Jersey JE4 8PR
T +44 1534 815555
F +44 1534 815640

SG Kleinwort Hambros Bank Limited

Guernsey Branch

PO Box 6, Hambro House
St Julian's Avenue, St Peter Port
Guernsey GY1 3AE
T +44 1481 726521
F +44 1481 727139

SG Kleinwort Hambros Bank Limited

Gibraltar Branch

Unit 5.02, Madison
Midtown, Queensway
Gibraltar GX11 1AA
T +350 2000 2000
F +350 2007 9037

www.kleinworthambros.com

