

Subscription Form / Investor Form

INVESTINVENT FUNDS SICAV-SIF

A public limited company (*société anonyme*) organized as an investment company with variable capital – specialized investment fund (*société d'investissement à capital variable – fonds d'investissement spécialisé*) under the laws of the Grand Duchy of Luxembourg

INVESTINVENT FUNDS SICAV-SIF (the "Fund")

INVESTINVENT WIND ENERGY FUND

(the "Sub-Fund")

REGISTERED OFFICE

33A, Avenue J.F. Kennedy

L-1855 Luxembourg

To: FIDUCENTER S.A. as Central Administrator Agent

E-mail: TA@fiducenter.lu

The Subscription Form/Investor Form should be received before 4 p.m. CET 2 Business Days prior the Valuation Date.

The undersigned,

NAME: _____

ADDRESS: _____

(the "**Subscriber**" or the "**Applicant**" or the "**Investor**")

Bank account details of the Subscriber:

These banking details shall be used by default in case of distribution payments. In case of a discrepancy between any payment details mentioned in any payment instructions and the banking details stated here below, the Central Administrator and/or the General Partner of the Fund reserve the right to suspend the payment until the Applicant provides any of them with evidence that the shareholder registered in the register of shareholders is the beneficiary of the account.	
Name of Bank	
Address	
Country	
BIC Code	
SWIFT	
National Code (e.g. BLZ/BC/Sort Code)	
Full Name of the Account Holder	
Account Number and Currency	
IBAN	

IN CASE OF ACQUISITION OF EXISTING SHARES OF THE FUND, PLEASE SKIP SECTION 2 AND 3 AND KEEP ON FILLING IN THE FORM.

BY WAY OF THIS FORM:

1. Adhesion

The Subscriber / Investor hereby adheres to the Issuing Document of “**INVESTINVENT FUNDS SICAV-SIF**” (the “**Company**” or the “**Fund**”), of which it acknowledges to have received a copy together with the articles of association of the Company (the “**Articles**”) to have read and understood.

2. Subscription

Up-to 5% of the amount to be subscribed by the relevant Shareholder is to be paid to the General Partner by the relevant Shareholder deducted from the subscription amount.

Please refer to the last version of the issuing document for each share classes' characteristics

	INVESTMENT DETAILS		
Shares	Currency	ISIN	Investment Amount
Class B EUR InvestInvent Wind Energy Fund Distribution Shares;	EUR	LU2017621207	
Class C EUR InvestInvent Wind Energy Fund Accumulation Shares	EUR	LU2017621462	
Class D CHF InvestInvent Wind Energy Fund Distribution Shares;	CHF	LU2017621629	
Class E CHF InvestInvent Wind Energy Fund Accumulation Shares	CHF	LU2017621892	
Class F EUR InvestInvent Wind Energy Fund Distribution Shares	EUR	LU2017624565	
Class G EUR InvestInvent Wind Energy Fund Accumulation Shares	EUR	LU2017624649	
Class H CHF InvestInvent Wind Energy Fund Distribution Shares	CHF	LU2017625703	
Class I CHF InvestInvent Wind Energy Fund Accumulation Shares	CHF	LU2017630539	

Subject to the formal acceptance of this subscription Form (the "Subscription Form"), the Company will issue and allot to the Subscriber the Shares as for this Subscription Form.

3. Payment

Payment for subscriptions must be received within one (1) Business Day prior to the relevant Valuation Day. Should the Subscriber pay an amount higher than the above-mentioned, the exceeding amount shall be returned to the Subscriber at earliest convenience of the Fund. The Subscriber shall not be entitled to receive any interest and/or remuneration and/or compensation of any kind on such advance/s.

4. Beneficiary

The Subscriber / Investor declares:

- to be a duly authorized financial institution, (credit institution, professional of the financial sector, insurance company, mutual fund, Investment Company in Risk Capital, Asset Manager, Family Office), in a jurisdiction with equivalent standard to anti money laundering regulations of the Grand Duchy of Luxembourg (*if yes, Declaration of the regulated financial institution should be completed*)
- And is acting in own account and not as trustee, agent, representative, intermediary, nominee or in a similar capacity on behalf of a third party, nor with a view to distribution or resale, and it has no contract, undertaking or arrangement with any affiliate or third party to sell, assign, transfer or grant a participation right with respect to its Partnership Interest and it has no current intention to sell, assign or otherwise transfer the Partnership Interest
- Other cases (i.e: acting as nominee,..) In this case and knowing that we have to identify on behalf of who the Subscriber / Investor is done, please fulfil the appropriate annex to identify:
- Annex 1: Identification of Ultimate Beneficial Owner in case of Individual and non-financial institution).
 - Annex 2: Identification of financial institution dully regulated in a country with equivalent AML-FT rules/obligations.
- to be the beneficial owner of the shares (*if yes fulfill the point 6 and 7*)
- not to be the ultimate beneficial owner (UBO) and that the UBO is/are the following person(s) (*complete the below table and fulfil the part 6 and 7*):

	UBO 1	UBO 2	UBO 3
Name			
Surname			
Percentage held			
Date and place of birth			
Full address			
Country			
Country/countries of Tax Residence*			
Tax Identification Number (TIN)**			
US Citizen/Resident: YES or NO ***			
<i>If yes, please tick the corresponding box(es):</i>	<input type="checkbox"/> US nationality <input type="checkbox"/> US resident address <input type="checkbox"/> US green card <input type="checkbox"/> US bank account <input type="checkbox"/> US telephone number <input type="checkbox"/> US mailing address including US post box	<input type="checkbox"/> US nationality <input type="checkbox"/> US resident address <input type="checkbox"/> US green card <input type="checkbox"/> US bank account <input type="checkbox"/> US telephone number <input type="checkbox"/> US mailing address including US post box	<input type="checkbox"/> US nationality <input type="checkbox"/> US resident address <input type="checkbox"/> US green card <input type="checkbox"/> US bank account <input type="checkbox"/> US telephone number <input type="checkbox"/> US mailing address including US post box

	<input type="checkbox"/> Present in the USA during a regular period (183 days per year at least)	<input type="checkbox"/> Present in the USA during a regular period (183 days per year at least)	<input type="checkbox"/> Present in the USA during a regular period (183 days per year at least)
Passport number and expiry date			
Politically exposed person: YES or NO			
Signature of the UBO			

* - Please note that this country is the country in which the Ultimate Beneficial Owner is taxable on his worldwide income and is relevant for the different tax services he may benefit from (Tax Report, Tax Relief, Tax Reclaim).

- In most cases the country of tax residence of an individual person is the same as the country of permanent residence of this person. In case this does not apply to your specific situation, please provide us with a certificate of fiscal residency issued by a competent authority or any other document confirming the country of tax residence of the Ultimate Beneficial Owner.

** For further information, please refer to: <http://www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/tax-identification-numbers> If the country of tax residence either does not issue a TIN or does not require the TIN to be disclosed, please indicate "N/A".

*** If yes, please provide us with a copy of the UBO's W9 Internal Revenue Service (IRS) Form.

5. Declaration of the regulated financial institution (this part must be completed only by the financial institution)

We _____ (name of the institution) duly represented by _____ (name of the legal representative) declare that our institution is registered under the number _____ (registration number) and authorized by _____ (name of the regulator).

We further declare that:

- we have written Policies, procedures and Documentary Requirements designed to comply with applicable local and international AML laws, regulations and requirements;
- our policies, standards and guidelines comply with our obligations in term of Know Your Customer, transactions monitoring, Anti Money Laundering, anti-terrorist provisions, tax obligation and FATCA regulations;
- will inform you in a timely manner of any change in the abovementioned information;
- to inform the Fund in writing of any information or evidence which could give rise to a suspicion concerning any act of money laundering or terrorist financing within the meaning of the relevant applicable local and international AML laws.

We hereby allow you to provide the documents / information permitting identification of the investor to any other Luxembourg professional (under modified Law of 12th November 2004) providing services to the Company.

Name of the legal representative: _____

Branch/Department/Division: _____

Position: _____

Signature of the legal representative:	Stamp of the institution:
--	---------------------------

6. Declaration of the UBO (this part must be completed only by the UBO(s), whether the Subscriber / Investor is not a regulated financial institution)

I further declare that:

I am not / We are not

a public office holder

an immediate family member and/or a close associate of a public office holder

I am / We are

a public office holder

an immediate family member and/or a close associate of a public office holder

Title: _____

Organisation name: _____

Sector of activity: _____

Country: _____

Link with the owner of a public office holder: _____

I undertake to inform you immediately of any change in the ownership of the above-mentioned company and/or about my declarations regarding the public office holder.

I expressly declare that funds put at disposal in order to form the share capital of the above-mentioned company and/or to perform other investments to the above-mentioned company have lawful source and then no link, direct or indirect, with the offences as per Luxembourg Law defined in the articles 506-1 of the penal code and 8-1 of the modified Law dated 19th February 1973 regarding the sale of medicinal substance and the fight against drug addiction, and undertake that, in no circumstance, will the above-mentioned company be used for illegal activities, especially for the financing of terrorism as per Luxembourg Law.

I undertake that the funds placed at Company's disposal are coming directly or indirectly from my assets or, if any, coming from the assets of the other Ultimate Beneficial Owner declared at the date of the fund's inflow.

If the amounts placed at Company's disposal are not coming directly or indirectly from the assets of the Ultimate Beneficial Owners declared, I/we undertake to immediately inform the Central Administrator Agent about the origin of funds in order to identify the final payer.

With reference to U.S. law on tax compliance (Foreign Account Tax Compliant Act),

I declare

not to be a U.S. person within the meaning of that regulation

to be a U.S. person within the meaning of that regulation

And that:

I have not / I have a US nationality

I have not / I have a US resident address

I have not / I have a US green card

I have not / I have a US bank account

I have not / I have a US telephone number

I have not / I have a US mailing address (including a US post office box)

I have not been / I have been present in the US during a regular period (at least 183 days in the United States or more, according to the following formula:

[Number of days in the current year x 1] + [number of days in the first preceding year x 1/3] + [number of days in the second preceding year x 1/6] = 183 days.)

I hereby confirm that it is my/our own and exclusive responsibility to know and respect the tax provisions applicable to me/us.

In this context, I certify that I will keep observing any tax obligation imposed by reason of my/our nationality, tax residence or location of my/our property.

My **Tax Identification Number** is _____ (if the country of tax residence either does not issue a TIN or does not require the TIN to be disclosed, please indicate "N/A").

I promise to keep the Central Administrator Agent guiltless and indemnified for any damages that might result for it and/or employees, due to a false or incomplete statement on my/our part.

I hereby allow you to provide the documents / information permitting identification of the Ultimate Beneficial Owner to any other Luxembourg professional (under modified Law of 12th November 2004) providing services to the Company.

7. Source of wealth (this part must be completed only if the subscriber / Investor is different of a regulated financial institution)

The Subscriber / Investor represents that the economic profile and origin of funds of the funds is the following:

Regarding the UBO 1

Name: _____

Professional activity: _____

Title: _____

Company name: _____

Sector of activity: _____

Estimation of patrimony: _____

Annual income: _____

What is the origin of the assets/funds to be invested into the Company? The description must be clear and self-explanatory ("inheritance" or "sale of property" are not sufficient and require further explanation and/or documentation):

Regarding the UBO 2

Name: _____

Professional activity: _____

Title: _____

Company name: _____

Sector of activity: _____

Estimation of patrimony: _____

Annual income: _____

What is the origin of the assets/funds to be invested into the Company? The description must be clear and self-explanatory ("inheritance" or "sale of property" are not sufficient and require further explanation and/or documentation):

Regarding the UBO 3

Name: _____

Professional activity: _____

Title: _____

Company name: _____

Sector of activity: _____

Estimation of patrimony: _____

Annual income: _____

What is the origin of the assets/funds to be invested into the Company? The description must be clear and self-explanatory ("inheritance" or "sale of property" are not sufficient and require further explanation and/or documentation):

8. Well-informed Investor¹

As per the Luxembourg Law on specialized investment funds of 13 February 2007 (the "SIF Law"), the applicant must declare to be a well-informed investor. If the applicant qualifies neither as an institutional investor nor as a professional investor, its status as a well-informed investor must be confirmed by a minimum investment of EUR 125,000 in to the Fund or by signed confirmation from an accepted Financial Institution.

WARNING: Despite such conditions regarding informed investor status, specific restrictions defined in the Fund's Issuing Document must be respected.

1. The applicant is an institutional or a professional investor (if not, please complete section 2. below)	<input type="checkbox"/> Yes	<input type="checkbox"/> No
2. The applicant adheres to the status of a well-informed investor according to the SIF Law (please tick the relevant box in column aside)	<input type="checkbox"/> The applicant is investing a minimum of EUR 125.000, - into the Fund ; or <input type="checkbox"/> The applicant is subject of an assessment made by: <input type="checkbox"/> a credit institution within the meaning of Directive 2006/48/EC ; <input type="checkbox"/> an investment firm within the meaning of Directive 2004/39/EC ; <input type="checkbox"/> a management company within the meaning of Directive 2001/107/EC	

¹ Tick the corresponding box.

9. Representations and warranties

This Subscription Form / Investor Form validly and irrevocably binds the Applicant and is enforceable against it pursuant to its terms.

With regard to the tax, legal, currency and other economic considerations related to this investment, the Applicant has only relied on the advice of, or has only consulted with, his own professional advisers.

The Applicant understands that the transfer of shares is subject to substantial restrictions and that the shares of one class may not be redeemable as per the articles of incorporation (the Articles) of the Company and its issuing Document.

The Applicant recognizes that neither the initiator nor the Board have promised, represented or guaranteed: (i) the safety of any capital investment in the Company; (ii) that the Company will be profitable; or (iii) that any particular investment return will be achieved or the probability of any investment return.

If the Subscriber / Investor qualifies as an Institutional Investor but is investing for the benefit of underlying clients, only those are bound by the terms of discretionary management agreements prohibiting such clients to have a direct claim against the shares subscribed in the Fund for their benefit.

Should the Subscriber / Investor be a corporate body, it represents to and warrants the Company the following:

- the Subscriber / Investor is a legal entity or an entity regularly and duly incorporated and validly existing with respect to the law of the State of its registered office or effective management;
- the Subscriber / Investor has all powers, rights, authority and capacity to enter into this Subscription Form / Investor Form and to carry out its obligations arising from it;
- the entering into of this Subscription Form / Investor Form and the performance of the obligations arising from it for the Subscriber / Investor was duly authorised by its relevant corporate or equivalent bodies, and requires no authorisation from any relevant authority which has not already been obtained;
- the entering into and performance of this Subscription Form / Investor Form by the Subscriber / Investor contravenes (i) no provision of its articles or equivalent incorporation documents, (ii) no contractual provision or undertakings under which the Subscriber is bound, (iii) no law or any regulations applicable to it.

10. Residence

The Subscriber / Investor represents to be a resident of and undertakes to provide the Alternative Investment Fund Manager and the Central Administrator with all information and/or certifications which may be necessary. The Subscriber / Investor undertakes to notify the Alternative Investment Fund Manager and the Central Administrator as soon as possible of any change in residence and undertakes in this respect to send to the Alternative Investment Fund Manager and the Central Administrator all information or certifications necessary to it in the context of this change of residence.

11. Confidentiality and Privacy Statement

The Subscriber / Investor undertakes to maintain confidential all information it may receive concerning the Company, the Alternative Investment Fund Manager and the Subscribers / Investors.

The personal data supplied by the applicant and contained in this Subscription Form / Investor Form, together with additional information that is furnished in connection with his subscription/investment, will be stored in digital form and processed by the Fund and/or its service providers as Data Processors pursuant to the Luxembourg law on data protection of 2nd August 2002. The applicant expressly consents by supplying his personal data, for the following purposes:

- (i) identification of the applicant (as well as of the ultimate economic beneficiary, if different) to comply, among others, with legal obligations under applicable anti-money laundering legislation,

- (ii) maintenance of a register of shareholders,
- (iii) administration of the applicant's holding,
- (iv) provision to the applicant of notices on products and services offered by the group,
- (v) conducting of statistical and historical analyses on an anonymous basis, and
- (vi) more generally, complying with applicable legislation and/or regulatory requirements.

Personal data or any information relating to the applicant will be stored until the applicant ceases to be a shareholder of the Fund or (if later) as long as the Fund and/or its service providers are required by the applicable laws and regulations to store such data. However, subsequent processing is possible under the conditions described under (v) above.

The Applicant acknowledges that a failure to provide any of the personal data or information requested in the Subscription Form / Investor Form will cause the non-processing of his application. The Applicant hereby consents to inform the Data Processor of any change in his personal data or information.

The Applicant has the right of access to his personal data and to general information on the data processing by the Data Processor, free of charge, upon application to the Data Processor and at reasonable intervals. The Applicant has the right of rectification of his personal data. By signing this Subscription Form / Investor Form, the Applicant agrees that personal data can be disclosed to the agents and service providers as provided for in the Issuing Document under "Data Protection".

12. Decision Making

The Subscriber / Investor confirms that this subscription/investment was decided on the sole basis of the Articles and the Issuing Document of the Company and represents that it has fully reviewed and understood the content of the Articles and the issuing document and that the information contained in these documents was sufficient to evaluate the risk inherent to this investment.

Moreover the Subscriber / Investor hereby certifies that all information contained in this Subscription Form / Investor Form is complete and correct and hereby agree to indemnify and hold harmless the Fund, the Administrator and the Depositary from and against all actions, suits, proceedings, claims, demands, costs, expenses, loss, liabilities and outgoings whatsoever which may be taken or made or sought from or against any of them in consequence of any false or misleading statements or omissions made by the subscriber / Investor herein or which may result directly or indirectly from any misrepresentation or breach of any warranty, condition or covenant or agreement set forth herein or in any other document delivered by the applicant to the Fund

Furthermore, I hereby certify that the Company has not marketed or promoted to me any of its financial products or investment opportunities. On my own initiative, I first requested information about the Company, products and investment opportunities.

13. Participation in anti-money laundering measures

Pursuant to the applicable laws and regulations of the Grand Duchy of Luxembourg relating to the obligations of financial institutions in the fight against the laundering of money arising from the sale of illicit drugs or from criminal organized activities, should the Subscriber / Investor be a corporate body, it will attach to this Subscription Form / Investor Form:

- (i) an original or a certified true copy of any deed or extract from an official register (dated of less 3 month) attesting the name, legal form and registered office of the Subscriber / Investor,
- (ii) the power of attorney of the signatory authorised by the Subscriber / Investor to sign this Subscription Form / Investor Form,
- (iii) a valid, legible and certified true copy (by a public authority) of the legal representative's identity card or passport*,

- (iv) a valid, legible and certified true copy (by a public authority) of the ultimate beneficial owner(s)' identity card or passport* (only if the subscriber / Investor is not a regulated financial institution),
- (v) a proof of residence such as a utility bill, a certificate of residence issued by a notary, or in general with any legal or government or formal document of recent date (not older than 3 months) that proves the UBO's residential address,
- (vi) the annexe A – Entity Tax residency Self-Certification for the Legal Entity, and
- (vii) the Form W-8BEN-E / W-8IMY.

In case the Subscriber / Investor is a natural person, it will attach to this Subscription Form / Investor Form:

- (i) a valid, legible and certified true copy (by a public authority) of the ultimate beneficial owner(s)' identity card,
- (ii) a certificate of residence issued by a notary, or in general with any legal or government or formal document of recent date (not older than 3 months) that proves the UBO's residential address, and
- (iii) The Form W-8BEN.

The Subscriber / Investor acknowledges that the Alternative Investment Fund Manager and the Depositary may also request from it any information and/or document and/or certificate which they deem necessary to comply with their obligations in the context of the fight against the laundering of money arising from the sale of illicit drugs or from criminal organized activities. The Subscriber / Investor represents that the amounts paid under this Subscription Form / Investor Form do not derive from the sale of illicit drugs or from criminal organized activities.

Subscriptions / Investments into the Fund and any accounts opened may be suspended by the Company or its Administrator until they are satisfied that the identification requirements under Luxembourg law have been fulfilled.

** (please pay attention to the fact that the page with the signature of the passport's holder is required)*

14. Notes

This Subscription Form / Investor Form must be received within the time limits fixed for the Subsequent Valuation Date. You must apply by mailing the original of this Subscription Form / Investor Form to the Central Administrator Agent: 18, rue de l'Eau, L-1449 Luxembourg.

If more than one Applicant signs, they will be deemed joint Applicants and shareholders. Rights attached to joint holdings must be exercised by all shareholders jointly. Applicants in excess of three should print their full names on a separate sheet and attach it, signed and dated, to this Subscription Form / Investor Form.

Payment must be received by the Depositary in cleared funds within the time limit set out at the above section PAYMENT, point 3. Payments will be made in the reference currency of the relevant class of shares.

If an application is rejected in whole or in part, the application monies (or balance thereof) will be returned to the Subscriber/Investor without any liability for the Fund or the Depositary.

A corporation must execute this form under its common seal or the hand of a duly authorized officer who should state his representative capacity. If this Subscription Form / Investor Form is signed under power of attorney the attorney hereby certifies that he has not received notice of revocation of that power - the original power of attorney or a certified copy thereof should accompany this Investor Subscription / Investor Form.

15.Applicable law – Jurisdiction

This Subscription Form / Investor Form is governed by and construed in accordance with the law of the Grand-Duchy of Luxembourg. Any dispute relating to this Subscription Form / Investor Form will be exclusively subject to the jurisdiction of the relevant courts of Luxembourg-City.

Date:

The Subscriber / Investor

Duly authorised signatory

Name(s): _____

(Stamp and signature)

All notices, requests, claims, demands and other communications hereunder or under the Agreement shall be validly made or delivered when made or delivered to us at the address specified below:

- o **E-mail:** _____ @ _____
[required field, please complete]

The Central Administrator Agent

Fiducenter SA

By: _____

(Stamp and signature)

Duly authorised

Name(s): _____

Title(s): _____

Date: _____

Annex 1 : Identification of Ultimate Beneficial Owner acting by the intermediary of:

Name of the Subscriber: _____.

	UBO 1	UBO 2	UBO 3
Name			
Surname			
Percentage held			
Date and place of birth			
Full address			
Country			
Country/countries of Tax Residence*			
Tax Identification Number (TIN)**			
US Citizen/Resident: YES or NO ***			
<i>If yes, please tick the corresponding box(es):</i>	<input type="checkbox"/> US nationality <input type="checkbox"/> US resident address <input type="checkbox"/> US green card <input type="checkbox"/> US bank account <input type="checkbox"/> US telephone number <input type="checkbox"/> US mailing address including US post box <input type="checkbox"/> Present in the USA during a regular period (183 days per year at least)	<input type="checkbox"/> US nationality <input type="checkbox"/> US resident address <input type="checkbox"/> US green card <input type="checkbox"/> US bank account <input type="checkbox"/> US telephone number <input type="checkbox"/> US mailing address including US post box <input type="checkbox"/> Present in the USA during a regular period (183 days per year at least)	<input type="checkbox"/> US nationality <input type="checkbox"/> US resident address <input type="checkbox"/> US green card <input type="checkbox"/> US bank account <input type="checkbox"/> US telephone number <input type="checkbox"/> US mailing address including US post box <input type="checkbox"/> Present in the USA during a regular period (183 days per year at least)
Passport number and expiry date			
Politically exposed person: YES or NO			

* - Please note that this country is the country in which the Ultimate Beneficial Owner is taxable on his worldwide income and is relevant for the different tax services he may benefit from (Tax Report, Tax Relief, Tax Reclaim).

- In most cases the country of tax residence of an individual person is the same as the country of permanent residence of this person. In case this does not apply to your specific situation, please provide us with a certificate of fiscal residency issued by a competent authority or any other document confirming the country of tax residence of the Ultimate Beneficial Owner.

** For further information, please refer to: <http://www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/tax-identification-numbers> If the country of tax residence either does not issue a TIN or does not require the TIN to be disclosed, please indicate "N/A".

*** If yes, please provide us with a copy of the UBO's W9 Internal Revenue Service (IRS) Form

Annex 2 : Identification of financial institution dully regulated in a country with equivalent AML-FT rules/obligations.

Objet: AML comfort letter

Declaration of the regulated financial institution, _____ (Name of the entity) acting by the intermediary of _____ (name of the Subscriber/Investor).

We hereby confirm that our credit / financial institution (the _____, ("entity") , established in _____ (country), submitted to the rules on the prevention and the fight against money laundering and terrorism financing, is supervised by _____ ("Regulator"). As evidence for our licence as a regulated entity, please refer to the website : _____.

Our entity strictly complies with the laws and regulations on the prevention of money laundering and terrorism financing, as well as with the Circulars and Regulations issued by the _____ on that subject.

In accordance with applicable legal and regulatory requirements, our entity has elaborated, and constantly adapts and completes, respective procedures and policies to prevent money laundering in the daily work. Consequently we duly applies the Know Your Customer identification rules. More specifically, each investor has to be identified before entering into a business relationship - including beneficial owners where applicable - and documentary evidence of their identity is held.

We identify and verify (where applicable) the beneficial owner(s) of the maintained structure (voting and/or non-voting shareholder) and

- Will inform Fiducener at onboarding and any time thereafter as it may be necessary of any natural person who is the ultimate beneficial owner equal to or more than 25% of the interest of the holding of the position in the entity and provide Fiducener with the respective documentary evidence;
- Will inform Fiducener at onboarding and any time thereafter as it may be necessary if the holding of the position is detained by 20 or less private investors and provide Fiducener with the respective documentary evidence;
- Will inform Fiducener at onboarding and any time thereafter as it may be necessary if any suspicious transaction / activity is detected that may be in direct or indirect relation with money laundering or terrorism financing.

We do not deal with "shell banks" (i.e. a foreign bank not having physical presence in any country).

We have risk grading procedures in place to differentiate between clients due diligence requirements for high and low risk relationships. In addition, we conduct enhanced client due diligence on politically exposed persons (PEPs), and on high risk relationships in line with legal requirements and industry best practices.

Knowledge of the customer is based not only on the formal identification of that client but also on its risk profile. According to the risk-based approach principle, our entity understands the client risk profile through a monitoring programme with regards to its transactions and activities, and based on documentation collection and risk assessment.

Our procedures include detecting and reporting suspicious activities to the department which is in charge of compliance and informing the Financial Intelligence Unit (FIU) in Luxembourg of all acts suspected of money laundering or terrorist financing. We are finally legally bound to keep the documents evidencing clients' identity at least five years after the end of the relationship.

The entity has appointed a Compliance Officer responsible for the elaboration of a programme on the prevention of money laundering and terrorist financing. Such programme is checked by our internal audit department and by the external auditor.

In accordance with applicable laws and regulations, including privacy, banking secrecy and data protection laws, our Company fully co-operates with governmental and law enforcement authorities. Under the afore-mentioned conditions, we are strictly complying with any information request from those authorities to which client information and documentation may be made available upon request, i.e. in the event of a court order or an enquiry of a legal or regulatory authorities in any competent jurisdiction, we will forthwith upon request furnish our competent Local authority to the extent permitted by law, which in turn will furnish to the requesting legal or regulatory authorities in Luxembourg with a copy of such documents to the extent permitted by the law.

In the context of preventing the financing of terrorism, we use lists issued by the supervisory and judiciary authorities and ensure that clients' files are checked regularly.

We provide appropriate training on the prevention measures to our employees on a regular basis.

Yours sincerely,

<< " Name of the entity" >>

Name:
Compliance Officer/AML responsable

<< Name: >>
<< TITLE OF AUTHORISED SIGNATORY>>