



REYL
INTESA SANPAOLO

To whom it may concern

Geneva, 27.09.2023

Anti-Money Laundering letter

Re: REYL & Cie Ltd

We confirm that REYL & Cie SA (REYL & Cie Ltd) is based and incorporated in Geneva and formed under the laws of Switzerland. Switzerland as a country is a member of the Financial Action Task Force – FATF and implements the FATF recommendations.

We further confirm that REYL & Cie SA (the "Bank") is regulated as a bank and securities dealer by the local supervisory authority, the Swiss Financial Market Supervisory Authority - FINMA (www.finma.ch), in respect of the conduct of all its financial business activities. The Bank is a subsidiary of the Intesa Sanpaolo Group ("ISP") and is subject to consolidated supervision by ISP.

As a bank regulated in Switzerland, the Bank is subject to financial market legislation governing the combating of money laundering that includes the Anti-Money Laundering Act (AMLA), the FINMA Anti-Money Laundering Ordinance and the Agreement on the Swiss bank's code of conduct with regard to the exercise of due diligence, as amended supplemented or otherwise modified from time to time.

Compliance with these regulations is also verified on an annual basis by the group internal auditors and external auditors who communicate their conclusions to our local supervisory authority the FINMA.

The Wolfsberg Questionnaire and audited annual reports of the Bank are available on our website at www.reyl.com under the section Legal Information. The list of the main shareholders of the Bank is available on both documents.

We confirm all Anti-Money Laundering checks have been carried out on all our clients and that:

- We maintain policies and procedures in accordance with applicable Swiss / FATF requirements to ensure we obtain evidence of the identity for all of our customers who transact business through you or on whose behalf we transact business through you;
- All documentary evidence of the verification process will be retained for at least 10 years after the client has ceased his business relationship with us;
- We have taken measures to ensure that our customers are neither individuals nor institutions which appear on applicable lists of suspected or known terrorists or terrorist organizations, nor against whom sanctions have been imposed by the Swiss SECO, EU, all G7 countries (Canada, France, Germany, Italy, Japan, UK, USA OFAC), Malta, Singapore, United Arab Emirates and United Nations. We will inform you if we identify any sanctioned person holding participations with you;

SUCCESS. TOGETHER.

REYL & Cie Ltd | Rue du Rhône 4 | 1204 Geneva | Switzerland | T + 41 22 816 80 00 | F +41 22 816 80 01 | contact@reyl.com | reyl.com

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- We will provide you with related customer identification documents and standard due diligence information (i.e. name, surname(s), nationality, location, date of birth, source of wealth and source of funds), which we may have on our files relating to the identity of the customer(s) and beneficial owner(s) upon request;
- We are satisfied that any funds which are remitted to you in connection with financial business conducted with you does not represent the proceeds of criminal conduct or terrorism activities;
- We acknowledge that you place reliance on our statements for your Customer Due Diligence (CDD) obligations in respect of introduced investors, it being understood also that we remain subject to Swiss laws and regulations, with the exception of ongoing monitoring;

We have identified and verified our customers and the beneficial owners and/or controlling persons;

- We confirm that we conduct transaction monitoring on customers and beneficial owners and/or controlling person for the purpose of identifying potential suspicious activity and reporting to relevant authorities;
- We confirm that where the underlying investor(s) and their beneficial owner(s), (if applicable) are considered to be either domestic or foreign Politically Exposed Persons ("PEPs") or are close associates of PEPs, we apply Enhanced Due Diligence and ensure ongoing monitoring of the relationship;
- We confirm that we performed the following control on each of our employees: Control of identity documents, certificate from the relevant cantonal bankruptcy and prosecution office (certificate of non-prosecution), confirmation of noncriminal record from the Swiss Federal Office of Justice, World Check, background and reference checks;
- We provide appropriate training on anti-money laundering and counter-terrorist financing requirements to all employees on a regular basis.

REYL & Cie SA

Paolo Giacomelli
Head of Compliance & AML

Roger Mürger
Operations Manager

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