

Sanctions Certificate

LuxCSD

Sanctions certification

Name of the institution: _____

Registered address: _____

Website address: _____

Business activities: _____

Does this questionnaire apply to your branches and/or subsidiaries? Yes No N/A

Does your institution have: Yes No

- any offices, transactions, investments, activities or planned activities in **sanctioned countries**⁽¹⁾; or
- any transactions, investments, activities or planned activities with (or in) any person or entity located in **sanctioned countries** or with (or in) any entity owned or controlled by any entity located in sanctioned countries?

If yes, please elaborate, including specific types of investments, transactions or activities and % of total revenues and/or assets that these instruments, transactions or activities represent for your company in sanctioned countries:

⁽¹⁾ In this document **sanctioned countries** means Iran^(*), Sudan, Cuba, Syria, North Korea.

^(*) For guidance relating to the lifting of certain U.S. sanctions pursuant to the Joint Comprehensive Plan of Action, please refer to the following link: https://www.treasury.gov/resource-center/sanctions/Programs/Documents/Implement_guide_jcpoa.pdf

A **sanctions target** means any party that is a target of U.S., EU, UK or UN sanctions or to your knowledge, any other sanctions authority relevant to your institution. Sanctions targets include any party identified on the OFAC list of SDN, OFAC Foreign Sanctions Evaders List, or OFAC Sectorial Sanctions Identifications Lists, and any party identified in, or in annex to, a resolution of the EU or the UN sanctions as a targeted party. U.S. sanctions targets also include any person or entity that is a citizen or resident of Iran, Cuba, Syria, Sudan and North Korea.

1). Does your institution screen clients and transactions against lists of persons, entities or countries issued by government/international bodies? Yes No

2). If yes, please specify the name of the relevant authority (e.g. EU Sanctions List, OFAC sanctions, etc): _____

3). What is the frequency of the screening? _____

- 4). Have you identified any clients that are sanctioned or that are owned or controlled by an individual entity that is sanctioned - or otherwise targeted - by the EU, the UN or any other sanctions regime relevant to your institution? Yes No
- 5). Is the account for the identified clients blocked/restricted on your institution's books and records? Yes No
- 6). Does your institution have a monitoring programme for unusual or potentially suspicious activity that covers funds transfers and monetary instruments, e.g. money orders, traveller's cheques, etc? Yes No
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Declaration and signatory area can be found on page 3.

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Sanctions certification

- 1). The client provides the certifications below as required by the general terms and conditions governing the provision of services and products by LuxCSD with the express purpose of assuring LuxCSD that the client's actions will not cause the client, LuxCSD or LuxCSD's agents, depositories or correspondents to violate financial or international trade regulations.
- 2). The client certifies that, regardless of whether it is subject to the jurisdiction of the EU and any EU member state, in all dealings with LuxCSD, it will comply with EU regulations regarding economical sanctions, anti-money laundering, anti-corruption as those regulations exist at the time of a transaction or service, provided that, for securities denominated in U.S. Dollars or issued or sub-deposited in the U.S.A. or with a U.S. person outside the U.S.A. (U.S.-linked securities) or cash transactions likely to be processed by a U.S. financial institution (U.S. cash transactions), the client will comply additionally with U.S. regulations.
- 3). The client further certifies that it will not knowingly or with reason to know, use or permit the use of any LuxCSD account, directly or indirectly, or enter into or sustain any client relation that would cause LuxCSD to violate EU regulations, or in the case of U.S.-linked securities or U.S. cash transactions, U.S. regulations, regarding economic sanctions, anti-money laundering or anti-corruption.

The undersigned, based on his/her best knowledge and belief, certifies the above referenced questions were answered considering the existing internal controls of the subject financial institutions, and further present an accurate representation of the existing state of the institution's anti-money laundering and anti-terrorist financing internal controls and financial service activities.

Authorised signatories:

Authorised signature

Authorised signature

Name

Name

Title

Title

Place: _____

Place: _____

Date: _____

Date: _____