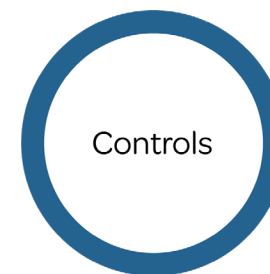


Daily	Periodically	On request
Analysis of higher risk transactions and their documentation	Constant regulatory monitoring of legislation and informing of potential impacts on the organization and/or activities of the EAM	Analysis of account opening files - prospective business relationships
Requests for further clarification of transactions or relationships with increased risks	Continuous training of employees (identification of needs with the head of the compliance function)	Checklist for opening a business relationship to be completed
Follow-up of open requests for clarification	Regular reporting (memo) to the head of the Compliance function	Establishment of the «KYC Approval Form» formalizing the review of the account opening file.
Verification of the application of internal directives	AML risk analysis	Analysis of account closure requests (documentation and paper trail)
	Quarterly report on AML risk monitoring	
	Review of the classification of higher risk clients	
	Review of PEP client classification	
	Review of the classification of countries at risk (FATF basis)	
	Monitoring of sanctions and embargoes from the Swiss authorities and client involvement	
	Review and updates of directives and procedures in compliance with regulations in force	



Daily	Periodically	On request
Support and assistance to the EAM (manager, collaborator)	Control of the respect of the investment and risk profiles of the clients (suitability / appropriateness) with the client portfolios	Specific controls at the request of the EAM
Control of the adequacy of the investment with the client's knowledge and experience form in terms of asset classes or relationships with increased risks	Control of the respect of the management policy	Support for the follow-up of incidents and the management of possible customer complaints
Control of the adequacy of the investment with the client risk profile form	Control of compliance with asset allocation grids	Assistance in the analysis of a new product
Verification of «pre-trade» control documentation by the manager in the inclusiv-Wize system	Quarterly risk monitoring report Management	Risk analysis of any new product, exceptional transaction and issue an opinion
Monitoring compliance with the EAM's duty to provide information to its customers on the basis of the information documents related to the investment	Review of operations carried out for own account by employees of the EAM (art 27 FinSA)	Proposal of risk mitigation measures
Verification of the application of internal directives	Control of behavioural compliance according to local regulations (cross-border activities)	Implementation and follow-up of the recommendations issued by the OS
Inform the Risk Function of the risks identified	EAM's quarterly risk monitoring report	
Control of compliance with limits set on the basis of risk indicators	Annual review of the EAM's significant risk map	
Alerting the Risk Function and/or the GFI Management Committee in the event of non-compliance with limits or in the event of a deterioration in risks	Control of the prescribed level of equity capital	