

KB Associates (“KBA”) Beneficial Ownership Register Services

Regulatory Obligations

The European Union (Anti-Money Laundering: Beneficial Ownership of Corporate Entities) Regulations 2019 (the “**2019 Regulations**”) came into effect on the 22nd March 2019 and apply to all Funds and Management Companies (“ManCos”).

There is no change to the definition of “beneficial owner” as set out previously:

- any natural person who ultimately owns or controls (either directly or indirectly) a corporate entity through ownership of over 25% of the shares or voting rights, or through control via other means.
- where there is no natural person identified as a beneficial owner as defined above, the persons holding the positions of “senior managing officials” shall be identified as the beneficial owners. Senior managing officials include Fund/ManCo directors.

2019 Regulations - New Requirements	Operation of Central Register
<ul style="list-style-type: none"> • The establishment of a central register of beneficial ownership (“RBO”) on which all Funds/ManCos must file their beneficial ownership information. • In addition to the existing required information for each beneficial owner, the 2019 Regulations introduce a new requirement to obtain the PPS number where one has been issued. The PPS number will not be available for inspection. Beneficial owners without a PPS number will be obliged to complete a BEN2 form as verification of identity. The BEN2 form contains a declaration, which must be solemnly declared to be true, verified, witnessed and signed by a notary public. 	<ul style="list-style-type: none"> • The 2019 Regulations provide for the establishment of the RBO. The RBO opened on 29th July 2019. • Funds/ManCos incorporated after the establishment of the RBO will have five months from the date of incorporation to make their first filing. • There is an obligation on all Funds/ManCos to keep beneficial ownership information in the RBO accurate and current and all changes must be filed within 14 days. • A separate register has been established for ICAVs and Unit Trusts to file their beneficial ownership information which will be held with the Central Bank of Ireland.
Access to Central Register	Offences
<ul style="list-style-type: none"> • The following will have unrestricted access (except for PPS numbers): <ul style="list-style-type: none"> - The Irish Police - FIU Ireland (Financial Intelligence Unit) - The Revenue Commissioners - The Criminal Assets Bureau - Other State Competent Authorities • Restricted access is granted to members of the public subject to a €2.50 administration fee per RBO report. 	<ul style="list-style-type: none"> • A Fund/ManCo which fails to comply with the 2019 Regulations may be liable to a fine not exceeding €500,000. • A custodial sentence of a term not exceeding 12 months may also be imposed.

KBA offers the provision of suitably qualified professionals dedicated exclusively to anti-money laundering, countering the financing of terrorism and financial sanctions (“AML/CFT/FS”) compliance to ensure Funds/ManCos are in compliance with the 2019 Regulations both in respect of the initial filing, ongoing monitoring and filing of changes. Please see biographies below.

COMMITMENT - EXPERTISE

All members of KBA's dedicated Money Laundering Reporting Officer ("MLRO") team have experience in the area of anti-money laundering, countering the financing of terrorism and financial sanctions ("AML/CFT/FS") compliance, with a focus on customer due diligence ("CDD"). Each acts as the MLRO to Irish investment funds and advises them on AML/CFT/FS issues. They are responsible for providing guidance and expertise on CDD documentation to fund boards, reviewing and testing the AML/CFT/FS Process of fund administrators, providing training to directors and reporting to the directors on AML/CFT/FS compliance matters.



Shane O'Neill

Shane has been active in the financial services industry since 2006 and leads the Money Laundering Reporting Officer service offering. Shane has extensive expertise in the area of Anti-Money Laundering (AML) and Countering the Financing of Terrorism (CFT) Regulatory Requirements and AML-CFT Program operations across multiple fund domiciles such as Ireland, Cayman, United States, Bermuda and Jersey for hedge funds, mutual funds and private equity.

Prior to joining KB Associates, Shane was employed by MUFG Investor Services within Ireland as an Associate Director with responsibility for the European AML Business-As-Usual Team together with Ongoing Monitoring Programs and Project Remediation. Previously Shane worked in Dublin for HedgeServ, an independent fund administrator, as a specialist within the Investor Services AML Team.

Shane holds qualifications as Qualified Financial Adviser together with Professional Certificate in Financial Crime from University College Dublin. Shane is also a member of the Institute of Banking within Ireland.

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Kamil Jaskiewicz

Kamil has been active in the financial services industry since 2015. Prior to joining KB Associates, Kamil was Assistant Vice President of the AML team in Apex Investor Services. Kamil also held various AML positions in MUFG Fund Services and State Street.

Kamil holds a Master's Degree in Administration from the University of Marie Curie Sklodowska in Poland and has completed the Professional Diploma in Compliance with the Institute of Bankers.

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Luigi Cerbone

Luigi has been active in the financial services industry since 2007 and is a Consultant within the Money Laundering Reporting Officer offering of KBA Associates. Luigi provides guidance and expertise on legislative and regulatory Anti-Money Laundering

and Countering the Financing of Terrorism (AML-CFT) issues to Irish and Cayman Fund Boards.

Prior to joining KB Associates, Luigi held the role of Money Laundering Reporting Officer for Axa MPS Financial, an Irish Life Insurance Company operating within the Italian Market where Luigi advised on AML-CFT Operational Compliance together with oversight of the Axa MPS Financial AML-CFT Framework.

Luigi holds a Business Administration Degree from Naples, Università Parthenope in Italy. Luigi also holds a MSc in Compliance awarded by University College Dublin. Luigi is also a Fellow of Compliance Institute "FCI", a Certified Data Protection Officer "CDPO" and a Certified Financial Crime Professional.

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Deirdre O'Callaghan

Deirdre has been active in the financial services industry since 2006. Prior to joining KB Associates Deirdre was a senior AML specialist at Sumitomo Mitsui Banking Corporation Europe with responsibility for CDD and sanction screening across a number of jurisdictions. Deirdre holds a Business Studies (Hons) Degree from Dundalk Institute of Technology and has completed a Professional Certificate in Financial Crime Prevention (the Compliance Institute).

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Faye McCrossan

Faye has been active in the AML/CFT/FS compliance area since 2015. Prior to joining KB Associates Faye was Assistant Vice President at Apex Group Ltd. with responsibility for CDD across a number of jurisdictions and fund types. Faye holds a Bachelor of Business Studies from Maynooth University. She has also completed the Professional Diploma in Compliance with the Institute of Bankers and is an Licentiate member of the Compliance Institute.

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Debora Wilde

Debora started her career working as solicitor at a law firm in Brazil where she practiced for almost 4 years prior to relocating to Ireland. She has been working in the area of Anti-Money Laundering since 2018 and has particular experience in the areas of Anti-

Money Laundering, Countering the Finance of Terrorism and customer due diligence.

Prior to joining KB Associates, Debora was an AML Supervisor at Citco Funds Services with responsibility for customer due diligence across a number of jurisdictions and fund types.

Debora holds a Law Degree and has completed the Professional Certificate in Compliance from Compliance Institute. She is registered as a Solicitor with both the Brazilian and Portuguese Bar Associations.

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Giuseppe Marchioni

Giuseppe has been active in the investment funds industry since 2008. He has extensive experience in the area of Anti-money laundering and Countering the Financing of Terrorism (AML-CFT) with a

particular focus on customer due diligence. Giuseppe is appointed by multiple global asset managers to act as the Money Laundering Reporting Officer to investment funds domiciled in Ireland and the Cayman Islands providing regulatory subject matter guidance on AML-CFT to fund boards.

Prior to joining KB Associates, Giuseppe was employed by Apex Fund Services (Ireland) Limited as Manager of the Client Onboarding – Know Your Customer (KYC) Team implementing the KYC Review Process (for both on-boarding and on-going reviews) for new and existing clients across multiple functions within the Apex Group.

Previously Giuseppe held the role Senior Compliance and AML Officer with Custom House Fund Services (Ireland) Limited, an independent fund administrator, where he supported the management of regulatory obligations including AML-CFT requirements.

Giuseppe holds a master's degree in Italian Law from L'Universita' Degli Studi Di Napoli Federico II in Naples.

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