

Campbells – Client Due Diligence Requirements

Campbells is committed to ensuring compliance with the anti-money laundering regulations of the jurisdictions in which it does business through effective client due diligence (“CDD”). A key element of CDD is to confirm the identity of our client and related parties. The below is not intended to be exhaustive but to provide a general guide on required due diligence documents. Campbells reserves the right to request additional documentation if required. If you believe that Campbells has already received all of your required documentation or that an exemption applies (e.g. listed entities and regulated entities, as addressed herein), please contact your Campbells legal representative for guidance.

NOTE: All documents provided for CDD purposes require certification per the guidelines below.	
Individuals/Natural Person Requirements (e.g. directors, managers, general partners, supervisors or equivalent, and shareholders, members, settlors, and ultimate beneficial owners who hold a 10% or greater legal or beneficial interest)	Photographic Identification <ul style="list-style-type: none"> – Passport (<i>preferred</i>)¹ – Driver’s License – National Government Issued ID Card (i.e. Residency card, Armed Forces ID) <p>Note: All photo IDs must be valid (i.e. unexpired)</p> Residential Address Verification <p>Please provide any one of the following to confirm:</p> <ul style="list-style-type: none"> – Utility Bill (i.e. Water, electricity, gas, landline telephone / internet bill only) – Driver’s License (if not already used for photographic identification)² – Bank statement (i.e. loan, mortgage) – Credit card statement – Bank Reference Letter – Professional Reference Letter – Official Government correspondence <p>Note: Address Verification documents must be less than six months old.</p> <p>Note: For young adults residing with their parents, a utility bill in the parent(s) name and a letter from the parents confirming that the applicant resides with them may be accepted.</p>

¹ A Passport should be provided if available.

² A Driver’s Licence or other similar identification documentation is only acceptable as residential address verification if the address displayed is current and it derives from a jurisdiction where there is a legal obligation to notify the relevant authority of address changes.

	<p>Explanation of Source of Wealth (required for interest holders)</p> <p>Source of wealth information is required for all interest holders with 10% or more interest.</p> <p>For guidance on source of wealth requirements, please refer to the Source of Funds ("SOF") & Source of Wealth ("SOW") Requirements included herein.</p> <p>In instances where your country of residence, citizenship and/or source of wealth is from a country outside of Campbells' List of Equivalent Jurisdictions (referenced herein), we will also require the following items:</p> <p>Second Form of Photographic Identification:</p> <ul style="list-style-type: none"> — Passport — Driver's License — National Government Issued ID Card (i.e. Residency card, Armed Forces ID) <p>Professional or Bank Reference letter:</p> <p>Original Reference letter from a lawyer, certified accountant or regulated financial institution. The relationship should be existing for at least three (3) years, must be addressed to Campbells and the letter should be issued on letterhead. (Sample attached)</p>
<p>Source of Funds ("SOF") & Source of Wealth ("SOW") Requirements</p> <p>In certain circumstances, we need to establish the source of wealth of a contributor, in addition to source of funds.</p> <p>Source of wealth relates to the general body of wealth held by the contributing party, beyond just the assets involved in the transaction at hand.</p> <p>Both source of funds and source of wealth information should be provided.</p>	<p>Where Campbells is providing legal advice in relation to a financial transaction, or where Campbells is providing Registered Office services to an entity participating in a financial transaction, we need to understand the source of the cash/assets involved in the transaction.</p> <p>The most straightforward way to help us meet this requirement is to provide a statement in writing (e-mail will suffice) from the contributing parties (e.g. investors, settlor, buyer, etc.) or by filling out our SOW/SOF Declaration Form, and providing relevant supporting documentation. Your confirmation should cover the following points:</p> <ul style="list-style-type: none"> — The type and value of assets being contributed — The overall value and composition of the contributor's net wealth — How the assets were generated (e.g. sale of investment property purchased [year] with employment earnings) — How the contributor's net wealth was accumulated (e.g. inheritance, trading profits, bonuses, salary as [position]) — Where the assets were generated (e.g. United Kingdom) — Where the contributor's net wealth was generated (e.g. USA)

	<p>Note: Where digital assets are a source of wealth the following additional details are required:</p> <ul style="list-style-type: none"> – The wallet provider or regulated exchange (e.g. Binance, Coinbase, Kraken) – The type of assets in portfolio (e.g. NFTs, Bitcoin, Altcoin, tokens) – Confirmation of the overall value and composition of the portfolio
<p>Company Requirements</p> <p>(e.g. Limited Companies, Limited Liability Companies, Unlimited Companies, Corporations)</p>	<p>For companies, we require the following documents:</p> <p>Corporate documents</p> <ul style="list-style-type: none"> – Formation documents (e.g. Certificate of Incorporation) – Constitutional documents (e.g. Memorandum and Articles of Association, Amendments By-laws, Issuer Charter) – Register of Directors and Register of Members, or Certificate of Incumbency issued within the last three months confirming directors and shareholders or members – Constitutional documents (e.g. Memorandum and Articles of Association, Amendments By-laws, Issuer Charter) – Explanation of purpose and nature of business of the Company – Confirmation of Source of Funds – CDD for all directors, shareholders and ultimate beneficial owners who hold 10% or more <p>Structure Chart (if available)</p> <p>A structure chart including each intermediary layer(s) up to ultimate beneficial owner (10% or more interest) level, being confirmed by one of the below:</p> <ul style="list-style-type: none"> – Director of the company – Company secretary – Authorised signatory of the company – An advisor to the company (e.g. legal counsel, accountant, tax advisor, administrator etc.) <p>Ownership and control</p> <p>CDD documents are required for the below parties:</p> <ul style="list-style-type: none"> – Direct owners – all shareholders with a direct equity interest of 10% or more – Direct controllers – all directors – Ultimate owners – parties with an ultimate equity interest of 10% or more (e.g. individuals or entities sitting above the direct owners)

	<ul style="list-style-type: none"> – Ultimate controllers – parties able to exercise control (e.g. individual directors of a corporate director) – Intermediate parties – any other parties sitting between direct owners/controllers and the ultimate owners/controllers
Partnership Requirements (e.g. Limited Partnerships, Limited Liability Partnerships)	<p>For limited partnerships (LPs) and limited liability partnerships (LLPs), we require the following documents:</p> <p>Partnership Documents</p> <ul style="list-style-type: none"> – Formation document (e.g. Certificate of Registration) – Constitutional document (e.g. Limited Partnership Agreement) – Register of Partners or Certificate of Incumbency issued within the last three months – Explanation of purpose and nature of business – Confirmation of Source of Funds – CDD on the general partner or any partners with control <p>Structure Chart (if available)</p> <p>A structure chart showing the ownership structure of the General Partner(s) including each intermediary layer(s) up to ultimate beneficial owner level (10% or more interest), being confirmed by one of the below:</p> <ul style="list-style-type: none"> – General Partner – Authorised signatory – An advisor to the company (e.g. legal counsel, accountant, tax advisor, administrator, etc.) – Ultimate Beneficial Owners (UBOs) and Ultimate Effective Controllers (UECs) <p>Ownership and control</p> <p>CDD documents are required for the following:</p> <ul style="list-style-type: none"> – Direct controllers – general partner(s) – Ultimate owners – parties with an ultimate equity interest of 10% or more of the general partner (e.g. individuals or regulated/listed entities sitting above the direct owners) – Ultimate controllers – parties able to exercise control (e.g. individual directors of a corporate general partner) – Intermediate parties – any other parties sitting between direct owners/controllers and the ultimate owners/controllers

	<p>NOTE: Where the Partnership is a fund structure, additional items are required. See Fund Requirements referenced herein.</p>
Foundations, Charities and Not-For-Profit Organisations Requirements	<p>For Foundations, we require the following documents:</p>
	<p>Entity documents</p> <ul style="list-style-type: none"> — Formation document (e.g. Certificate of Formation) — Constitutional document (e.g. Charter) — Most recent copies of your Form 990 (if applicable) — Foundation Confirmation Letter (sample attached) — Council Member information (e.g. Statement) — Explanation of Purpose and Nature of Foundation or Charity — Confirmation of Source of Funds <p>Structure Chart (if available)</p> <p>A structure chart including each intermediary layer(s) up to ultimate beneficial owner level (10% or more interest), being confirmed by one of the below:</p> <ul style="list-style-type: none"> — Council member — Authorised signatory — An advisor to the Foundation (e.g. legal counsel, accountant, tax advisor, administrator, etc.). <p>Ownership and control</p> <p>CDD documents are required for the key parties involved with the foundation, including:</p> <ul style="list-style-type: none"> — Direct beneficiaries – those parties with a direct vested interest in the assets of the foundation (e.g. named beneficiaries) — Direct controllers – those parties exercising direct control over the foundation (e.g. supervisors, council members, guardians, etc.) — Direct contributors – those parties who have directly contributed the assets of the foundation (e.g. the founder) — Ultimate beneficiaries – those parties with an ultimate vested interest in the assets of the foundation (e.g. any individuals or regulated/listed entities sitting above direct beneficiaries who are private companies, trusts, etc.) — Ultimate controllers – those parties exercising ultimate control over the foundation (e.g. individual directors of a council member which is a corporate) — Ultimate contributors – those parties who have ultimately contributed the assets of the foundation (e.g. high net worth

	<p>individual sitting behind a founder which is a corporate, or trust, or similar)</p> <ul style="list-style-type: none"> – Intermediate parties – any other parties sitting between the direct and ultimate beneficiaries/controllers/contributors
Trust Requirements	For trusts, we require the following documents:
	<p>Trust documents</p> <ul style="list-style-type: none"> – Constitutional document (e.g. Trust Deeds or Declaration of Trust) – Trustee Declaration Letter (attached) – CDD on all related parties outlined under Ownership and Control – Confirmation of Source of Funds <p>Structure Chart (if available)</p> <p>A structure chart including each intermediary layer(s) up to ultimate beneficial owner (10% or more interest) level, being confirmed by one of the below:</p> <ul style="list-style-type: none"> – Settlor – Grantor – Trustee – Protector – Enforcer – Beneficiaries – Authorised signatory <p>Ownership and control</p> <p>CDD documents are required for the key parties to the trust, including :</p> <ul style="list-style-type: none"> – Direct beneficiaries (18 years or older) – those parties with a direct vested interest in the assets of the trust (e.g. named beneficiaries) – Direct controllers – those parties exercising direct control over the trust (e.g. trustees, protectors, enforcers, etc.) – Direct contributors – those parties who have directly contributed the assets of the trust (e.g. the settlor) – Ultimate beneficiaries – those parties with an ultimate vested interest in the assets of the trust (e.g. any individuals or regulated/listed entities sitting above direct beneficiaries who are private companies, trusts, etc.). – Ultimate controllers – those parties exercising ultimate control over the trust (e.g. individual directors of a trustee which is a private company).

	<ul style="list-style-type: none"> – Ultimate contributors – those parties who have ultimately contributed the assets of the trust (e.g. high net worth individual sitting behind a settlor which is a corporate, or foundation, or similar) – Intermediate parties – any other parties sitting between the direct and ultimate beneficiaries/controllers/contributors
Fund Requirements	In addition to the standard corporate documents and CDD required for related parties, the following items are required for fund structures:
	<p>AML/KYC Comfort Letter</p> <p>The AML/KYC comfort letter must confirm the following the details outlined in the Campbells Administrator – AML/CTF/CPF Comfort Letter (attached)</p> <p>Investment Objective and Strategy</p> <p>Private Placement (“PPM”) or Offering Memorandum (“OM”)</p>
Listed Companies	For entities with securities listed on a recognised international stock exchange, we can verify required details directly from the relevant exchange’s website.
Regulated Companies	For entities carrying on business in relation to which a regulatory body in an approved country (see Campbells’ List of Equivalent Jurisdictions) exercises regulatory functions, we can verify required details directly from the relevant regulator’s website.

CERTIFICATION GUIDANCE

Documentation provided to Campbells should be properly certified in accordance with the requirements below in order to avoid delays. Documentation not properly certified will be returned.

Certification Requirements	All documentation provided is required to be certified by one of the following:
	<p>Suitable Certifiers</p> <p>A copy of a document presented in lieu of examining the original document must bear a certification by an individual holding one or more of the following professional positions:</p> <ul style="list-style-type: none"> — A qualified accountant, registered with a recognised professional body — A qualified actuary, registered with a recognised professional body — A qualified lawyer, attorney, or barrister, registered with a recognised professional body — A Serving Judge — A Notary public (must still include the required certification language) — A Chartered company secretary — A Commissioner of Oaths — A Senior civil servant — A Serving police or customs officer — An Officer of an embassy, consulate or high commission — A Director, officer or senior manager of a regulated entity
	The certifier is required to certify all copy documents as follows:

	<p>Certification Language</p> <p>The certification wording must confirm the following:</p> <ol style="list-style-type: none"> 1. The copy is a true and accurate copy of the original document; and where the document contains a photo, 2. the photograph within the document is a true likeness of the person named. <p><u>Examples:</u></p> <p>For all copy documents, the Certifier must write:</p> <p>"I hereby certify that the document(s) attached hereto is/are true and accurate copies of the original(s) thereof."</p> <p>For documents containing a photo, the Certifier must also write:</p> <p>"I hereby certify that, where the documents constitute photographic identification, the photograph(s) included in the attached is/are a true likeness of the person concerned."</p> <p>In addition to the above, every certification must be accompanied with the following details:</p> <ul style="list-style-type: none"> – Date on which the document was certified – Signature of the Certifier – Full Name of the Certifier – Capacity / Role and qualification of the Certifier – Contact address, telephone number and email address of the Certifier – Stamp of the Certifier (if available)
	<p>Please note the following:</p>
	<ul style="list-style-type: none"> – The person signing as a Certifier cannot certify their own documents. – The person signing as a Certifier cannot be a relative or family member of the person whose document is certified nor can they reside at the same address as that person. – All copy documents must be clear and legible. – Certification must be conducted within six (6) months of submission to us. – Documents NOT IN ENGLISH will need to be translated and accompanied by a translation certificate.

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| | <ul style="list-style-type: none">– When it comes to identification documents, we need both photo and signature pages if these are on different pages. |
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CAMPBELLS LIST OF EQUIVALENT JURISDICTIONS AND APPROVED STOCK EXCHANGES

Campbells List of Equivalent Jurisdictions			
Australia	Finland	Isle of Man	Portugal
Austria	France	Italy	Singapore
Belgium	Germany	Japan	South Korea
Bermuda	Greece	Jersey	Spain
British Virgin Islands	Guernsey	Luxembourg	Sweden
Canada	Hong Kong	Netherlands	Switzerland
Cayman Islands	Iceland	New Zealand	United Kingdom
Denmark	Ireland	Norway	United States
Estonia			

Campbells List of Approved Stock Exchanges		
Abu Dhabi Securities Exchange	Cyprus Stock Exchange	Nasdaq Stockholm
Amman Stock Exchange	Deutsche Borse	Nasdaq Tallinn
Athens Stock Exchange	Dusseldorf Stock Exchange	Nasdaq Vilnius
Australian Securities Exchange	Eurex	National Stock Exchange of India
B3 S.A. (Formerly BM&F Bovespa)	Euronext Brussels	New York Stock Exchange (NYSE)
Barbados Stock Exchange	Euronext Dublin	New Zealand Exchange
BATS Global Markets	Euronext Lisbon	Nuam Exchange
Bermuda Stock Exchange	Euronext NV	NYSE American
BOAG Borsen AG	Euronext Oslo Børs	NYSE Arca
Bolsa de Barcelona	Euronext Paris	NYSE Chicago
Bolsa de Bilbao	Fukuoka Stock Exchange	NYSE National
Bolsa de Madrid	Hong Kong Exchange and Clearing	Osaka Exchange
Bolsa de Valencia	Indonesia Stock Exchange	Philippine Stock Exchange
Bolsa de Comercio de Buenos Aires	Intercontinental Exchange	Prague Stock Exchange
Bolsa Mexicana de Valores	International Securities Exchange	Saudi Exchange (Tadawul)
Bolsas y Mercados Espanoles	Jamaica Stock Exchange	Shanghai Stock Exchange
Borsa Istanbul	Johannesburg Stock Exchange	Shenzhen Stock Exchange
Borsa Italiana SPA	Korea Exchange	Singapore Exchange
Borse Berlin	London Stock Exchange	SIX Swiss Exchange
Borse Frankfurt	Luxembourg Stock Exchange	Stock Exchange of Mauritius
Borse Munchen	Malta Stock Exchange	Taiwan Stock Exchange
Borse Stuttgart	Montreal Exchange	Tel Aviv Stock Exchange
BSE Limited	Nagoya Stock Exchange	The Egyptian Exchange
Bucharest Stock Exchange	Nasdaq	The Stock Exchange of Thailand
Budapest Stock Exchange	Nasdaq Copenhagen	TMX Venture Exchange
Bursa Malaysia	Nasdaq Helsinki	Tokyo Stock Exchange
Cayman Islands Stock Exchange	Nasdaq Iceland	Toronto Stock Exchange
Channel Islands Stock Exchange	Nasdaq OMX Nordic	Trinidad and Tobago Stock Exchange
Chicago Board Options Exchange	Nasdaq PHLX	Warsaw Stock Exchange
CME Group	Nasdaq Riga	Wiener Borse AG (Vienna Stock Exchange)
Colombo Stock Exchange		

Please note, this list is subject to change and Campbells reserves the right to request additional documentation or information, when required.

Campbells - Certification Certificate

I, _____, in my capacity as _____
working in _____ certify that the document(s) attached hereto and listed below is/are
true and accurate copies of the original(s) thereof:

Please list each document certified (i.e. Passport, Utility Bill, Register of Members, Operating Agreement)

[illegible]

I also certify that, where the above documents constitute photographic identification, the photograph(s) included in the attached is/are a true likeness of the person concerned.

Signature of Certifier:	
Date of Certification:	
Position or Capacity:	
Professional Qualification:	
Contact Address:	
Contact Telephone:	
Contact Email Address:	

Certifiers Official Seal or Stamp (If applicable)

Note: A certifier must be a suitable person, such as for instance a lawyer, accountant, director or manager of a regulated entity/ financial service provider, notary public, member of the judiciary or a senior civil servant.



CAMPBELLS SAMPLE - BANK REFERENCE LETTER

[On Bank Letterhead]

[DD Month YYYY]

Campbells
Floor 4, Willow House
Cricket Square
Grand Cayman, KY1-9010
Cayman Islands

RE: LAST NAME(S) - First Name(s) Middle Name(s) — Bank Reference Letter

Dear Campbells:

[LAST NAME(S) - First Name(s) Middle Name(s)] has been a customer of this bank for [Minimum of 3 years] years. During this time, [his/her] accounts have been managed in a proper manner.

The address we have on file for [LAST NAME(S) - First Name(s) Middle Name(s)] is [## - ## Street Address, City/Town, State/Province, Country, Postal/Zip Code].

Should you require any further information, please do not hesitate to contact me.

Sincerely,

[Full Name]

[Title]

[Contact Email Address]

[Contact Phone Number]



CAMPBELLS SAMPLE – PROFESSIONAL REFERENCE LETTER

[On Letterhead]

[DD Month YYYY]

Campbells
Floor 4, Willow House
Cricket Square
Grand Cayman, KY1-9010
Cayman Islands

Re: [First Name(s) Middle Name(s) LAST NAME(S)] – Professional Reference

Dear Campbells,

I have known [First Name(s) Middle Name(s) LAST NAME(S)] for [minimum three] years in my capacity as [professional capacity in which known] and during that period, they have to best of my knowledge, been [honest and respectable], [a person of good character and integrity] and [trustworthy].

[Brief background information to describe what capacity you know the aforementioned individual.]

The address we have on file for [First Name(s) Middle Name(s) – LAST NAME(S)] is [## - ## Street Address, City/Town, State/Province, Country, Postal/Zip Code].

I have no hesitation in recommending [First Name(s) Middle Name(s) LAST NAME(S)] as a person to transact business with.

Should you require any further information, please do not hesitate to contact me.

Sincerely,

[Full Name]

[Title]

[Contact Email Address]

[Contact Phone Number]



CAMPBELLS SAMPLE – TRUSTEE DECLARATION

[On Letterhead]

[DD Month YYYY]

Campbells
Floor 4, Willow House
Cricket Square
Grand Cayman, KY1-9010
Cayman Islands

Dear Campbells,

RE: [FULL LEGAL NAME OF TRUST (the “Trust”) – Trustee Declaration]

As requested, we are pleased to confirm that as trustee of the Trust, as of the date hereof and according to the documentation of the [irrevocable/revocable] Trust established on [insert date] under the laws of [insert jurisdiction], the following persons are mentioned as relevant parties to the Trust.

Settlor(s) / Grantor(s)

We confirm that the following persons are mentioned as the settlor(s) of the Trust:

Full Legal Name	Date of Birth (DD-MM-YYYY)	Profession	Residential Address

Beneficiaries (Primary and Contingent)

We confirm that all beneficiaries of the trust are unborn heirs.

Or

We confirm that the following person(s) are of legal age (18 years) and are mentioned as beneficiaries of the Trust:

Full Legal Name	Date of Birth (DD-MM-YYYY)	Primary or Contingent	Relation to Settlor	Residential Address

Or

We confirm that the following charities/foundations are the sole beneficiaries of the trust.

Name:

Address:

Enforcer/ Protector / Trustee / Authorised person

We confirm that there is no enforcer, protector or authorised person of the Trust.

OR

We confirm that the following persons are mentioned as an enforcer, protector, trustee or authorised person of the Trust:

<i>Full Legal Name</i>	<i>Date of Birth (DD-MM-YYYY)</i>	<i>Capacity</i>	<i>Profession</i>	<i>Residential Address</i>

Purpose and Assets of the Trust

Trustee Declaration

I/We hereby confirm that the information provided herein is accurate, correct and complete and that the documents submitted along with this letter are genuine. I understand to inform Campbells in writing of any changes to the information already provided.

Position or Capacity:.....

Contact Address:.....

Contact Telephone:.....

Contact Email Address:.....

Regulatory License (if applicable):



CAMPBELLS SAMPLE – FOUNDATION CONFIRMATION LETTER

[On Letterhead]

[DD Month YYYY]

Campbells
Floor 4, Willow House
Cricket Square
Grand Cayman, KY1-9010
Cayman Islands

Dear Campbells,

RE: [FULL LEGAL NAME] (the “Foundation”) – Foundation Confirmation Letter

As requested, we are pleased to confirm that as the Secretary of the Foundation Council, as of the date hereof and according to the documentation of the Foundation established on [insert date] under the laws of [insert jurisdiction], the following persons are mentioned as relevant parties to the Foundation.

Founder(s) / Initiator(s)

We confirm that the following person(s) are mentioned as the Founder(s) of the Foundation:

Full Legal Name	Date of Birth (DD-MM-YYYY)	Profession	Residential Address

Beneficiaries (Primary and Contingent)

We confirm that all beneficiaries of the Foundation are unborn heirs.

OR

We confirm that the following person(s) are of legal age (18 years) and are mentioned as beneficiaries of the Foundation:

Full Legal Name	Date of Birth (DD-MM-YYYY)	Relation to Founder	Residential Address

OR

We confirm that the following charities/foundations are the sole beneficiaries of the Foundation.

Full Legal Name	Date of Birth (DD-MM-YYYY)	Website

Foundation Council Members

We confirm that the following persons are mentioned as members of the Foundation Council:

Full Legal Name	Date of Birth (DD-MM-YYYY)	Profession	Residential Address

Executor/ Protector / Administrator

We confirm that there is no enforcer, protector, administrator or authorised person of the Foundation.

OR

We confirm that the following persons are mentioned as an enforcer, protector or authorised person of the Foundation:

Full Legal Name	Date of Birth (DD-MM-YYYY)	Profession	Residential Address



Purpose and Assets of the Foundation

Please provide sufficient information to allow us to understand the assets and/or property held by the Trust

Secretary of Foundation Declaration

I/We hereby confirm that the information provided herein is accurate, correct and complete and that the documents submitted along with this letter are genuine. I understand to inform Campbells in writing of any changes to the information already provided.

Position or Capacity:

Contact Address:.....

Contact Telephone:.....

Contact Email Address:.....

Regulatory License (if applicable):



CAMPBELLS SAMPLE – ADMINISTRATOR AML/CTF/CPF COMFORT LETTER

[To be provided on company letterhead]

[DD Month YYYY]

Campbells
Floor 4, Willow House
Cricket Square
Grand Cayman, KY1-9010
Cayman Islands

RE: AML Comfort Letter – [Name of Fund(s)]

Dear Sirs,

[Full Legal Name of Administrator] is a licensed [Type of License and License Number], established in [Year established] and operating under the laws of [Jurisdiction of Licensing]. As an authorised institution, regulated by [Name of Regulatory Authority], the competent authority for the supervision of [financial services institutions] in the aforementioned country, we hereby confirm that:

1. We maintain Anti Money Laundering & Counter Terrorist and Proliferation Financing (“AML/CTF/CPF”) policies and procedures applicable to all employees and have an on-going training program. We have implemented related procedures and controls including a procedure on suspicious activity reports;
2. We perform risk assessments for all underlying investors, mandates and proxy holders using a combination of relevant risk factors (including source of wealth/funds) prior to entering into a business relationship and obtain information on the purpose and nature of the business relationship (Risk Based Approach);
3. We perform the identification and verification of the identity of the underlying investors based on the initial risk assessment. Where applicable, the identification and verification of the identity of our clients, beneficial owners (10% or more interest or control as required per AML/CTF/CPF Regulations of Cayman Islands), other controlling parties and proxy holders is performed, such that the ownership and control structure of the underlying investors in particular legal persons, trusts and similar legal arrangements are understood and risks are assessed;
4. We perform enhanced due diligence on higher risk underlying investors and their beneficial owners, where applicable, including politically exposed persons (“PEP”) and, where a relationship is established with countries or territories which do not or insufficiently apply AML/CTF/CPF measures;
5. Prospective customer’s names (individuals, companies and institutions) are screened through official and private blacklists in order to avoid entering into a business relationship with individuals or institutions



which appear on applicable lists of terrorists or terrorist organisations, or against whom sanctions have been imposed by the EU, UK or United Nations; or with anyone suspected to be involved in a criminal sphere. In addition, we comply with OFAC sanctions programs and perform sanctions screening against the listings of the US Department of Treasury, Office of Foreign Asset Control ("OFAC");

6. We perform on-going monitoring of the business relationship to maintain Know-Your-Client information current including detection of unusual transactions which are not consistent with the expected business activity, and where necessary, the origin of funds and origin of wealth;
7. We retain investor due diligence documentation during a period of at least five (5) years following the end of the business relationship and will make it available upon written request;
8. We do not enter into business relationships with shell banks or accept shell banks as underlying investors or beneficial owners;
9. We do not enter into business relationship with companies using bearer shares or bearer instruments;

Yours faithfully,

[Full Name]

[Title]

[Contact Email Address]

[Contact Phone Number]

CAMPBELLS - SOURCE OF WEALTH/FUNDS DECLARATION FORM

Campbells has a regulatory requirement to understand and verify the legitimacy of its clients' source of wealth and/or source of funds, which includes funds used to pay the fees of any Campbells Group entity. This form should be completed by the applicant or the nominated person acting on behalf of the client. All information requested must be provided and supporting documentation must be submitted with the completed and signed form.

Accordingly, I/We wish to declare the following:

I/We	
LAST NAME(s) – First Name(s), Middle Name(s) OR FULL LEGAL NAME OF ENTITY	
At physical address:	
(STREET ADDRESS, CITY, STATE/PROVINCE, POSTAL, COUNTRY)	

Do hereby declare that my /our wealth and / or funds originate from the following source(s):

Please provide sufficient information to allow us to understand how you obtained your wealth and/or funds. Please be as descriptive as possible.

Please note that evidence and documentation of this source, as detailed in the Source of Wealth and Source of Funds Guidelines, must be provided for all applicants, and Campbells reserves the right to request additional information and/or documentation if deemed necessary.

I/We declare that the information provided in this form is true, accurate and complete. We confirm the wealth/funds originate from legitimate sources, do not constitute the proceeds of crime including money laundering, and are not from or in any way linked to any individuals or entities subject to UK, Cayman Islands, BVI, Hong Kong, EU, United Nations or OFAC sanctions. I/We agree to provide Campbells with any further information or documentary evidence in respect to the foregoing information.

Signature	
Full Legal Name	
Capacity (i.e. Client or Authorised Signatory)	
Date	

CAMPBELLS - SOURCE OF WEALTH/FUNDS SUPPORTING EVIDENCE

Description of source of wealth or funds	Information required	Examples of supporting documents (one of the following)
1. Employment Income – Savings from salary	<input type="checkbox"/> Title/Occupation <input type="checkbox"/> Employer's name and address <input type="checkbox"/> Nature of business operations <input type="checkbox"/> Annual Salary	<ul style="list-style-type: none"> • Certified copy of most recent pay slip. • Letter from employer confirming salary and years of employment. • Certified or original (electronic) copy bank statement showing receipt of salary payment from named employer.
2. Sale of Property	<input type="checkbox"/> Sold property address <input type="checkbox"/> Date of sale <input type="checkbox"/> Total sale amount	<ul style="list-style-type: none"> • Certified copy of sale contract. • Letter from a licenced solicitor or accountant or real estate agent, stating property address, date of sale and proceeds received.
3. Investments	<input type="checkbox"/> Type of investments <input type="checkbox"/> Jurisdiction of investments <input type="checkbox"/> Nature of investments (i.e. real estate, technology, bonds, stocks.	<ul style="list-style-type: none"> • Certified or original (electronic) copy investment statement. • Confirmation from the relevant investment company. • Letter from a licenced accountant detailing the investments.
4. Sale of investments / Liquidation of investment portfolio	<input type="checkbox"/> Sale amount <input type="checkbox"/> Type of investments <input type="checkbox"/> Date of sale <input type="checkbox"/> Period of time investments held	<ul style="list-style-type: none"> • Certified copy of surrender statement. • Certified copy of Bank Brokerage statement (<i>clearly showing sale and receipt of funds & investment on company letterhead</i>). • Signed letter detailing funds from a regulated or licensed individual and/or company.
5. Company Sale	<input type="checkbox"/> Company Name <input type="checkbox"/> Nature of business of Company <input type="checkbox"/> Sale amount <input type="checkbox"/> Date of sale <input type="checkbox"/> Applicant's share	<ul style="list-style-type: none"> • Letter from licensed solicitor or accountant confirming sale. • Certified copy of sale contract and bank statement showing proceeds.
6. Company Profits	<input type="checkbox"/> Company name and address <input type="checkbox"/> Nature of business of Company <input type="checkbox"/> Confirmation of affiliation to applicant <input type="checkbox"/> Amount of annual profits	<ul style="list-style-type: none"> • Certified copies of the latest audited financial statements. • Letter from licenced accountant detailing profits.

7. Inheritance	<input type="checkbox"/> Name of deceased <input type="checkbox"/> Date of death <input type="checkbox"/> Relationship to applicant <input type="checkbox"/> Date received <input type="checkbox"/> Amount received	<ul style="list-style-type: none"> • Letter from a licensed solicitor or estate trustee confirming the details of the inheritance. • Certified copy of the will. • Certified grant of probate, which must include the value of the estate.
8. Gift	<input type="checkbox"/> Total amount <input type="checkbox"/> Date received <input type="checkbox"/> Reason for gift <input type="checkbox"/> Relationship to applicant <input type="checkbox"/> Identity of the Donor	<ul style="list-style-type: none"> • Legal documentation evidencing gift where possible. • Letter from donor detailing details of gift. • Certified or original (electronic) bank statement, showing funds received from donor; and <ul style="list-style-type: none"> ◦ Identification and source of wealth confirmation of the donor.
9. Compensation Payment / Maturing Investments or Policy claim payment	<input type="checkbox"/> Amount received <input type="checkbox"/> Policy provider <input type="checkbox"/> Policy number/reference <input type="checkbox"/> Date of surrender	<ul style="list-style-type: none"> • Letter from insurer confirming surrender. • Letter from the investment company re notification of proceeds or claim. • Certified copy of closing statement.
10. Divorce Settlement (or other form of settlement)	<input type="checkbox"/> Full name of all parties <input type="checkbox"/> Effective date of settlement <input type="checkbox"/> Total number of assets in settlement	<ul style="list-style-type: none"> • Certified copy of court order / agreement. • Letter from legal counsel or solicitor detailing settlement.
11. Bank Loan	<input type="checkbox"/> Name of issuing bank <input type="checkbox"/> Address of issuing bank <input type="checkbox"/> Amount to be paid	<ul style="list-style-type: none"> • Certified or original (electronic) copy bank statement showing receipt of loan. • Certified copy of loan agreement.
12. Dividend Payment	<input type="checkbox"/> Applicant's name <input type="checkbox"/> Company name <input type="checkbox"/> Company address <input type="checkbox"/> Amount to be paid	<ul style="list-style-type: none"> • Certified dividend contract note(s). • Certified or original (electronic) copy of bank statement showing income. • Letter detailing dividends details from licensed or regulated individual or firm.
13. Pension / Retirement Income	<input type="checkbox"/> Amount received <input type="checkbox"/> Policy provider <input type="checkbox"/> Policy number/reference <input type="checkbox"/> Date of payment	<ul style="list-style-type: none"> • Certified or original (electronic) copy of pension statement. • Certified or original (electronic) copy of Bank statement showing pension income. • Letter from paying institution.

14. Financing Activities	<input type="checkbox"/> Type of Financing (e.g. equity, debt, digital assets/SAFTs) <input type="checkbox"/> Date of closing <input type="checkbox"/> Aggregate amount raised	<ul style="list-style-type: none"> Supporting documents to be confirmed by Campbells Compliance Team as applicable.
15. Other (specify)	<input type="checkbox"/> Nature of income <input type="checkbox"/> Date of income received <input type="checkbox"/> Total amount received	<ul style="list-style-type: none"> Supporting documents to be confirmed by Campbells Compliance Team as applicable.

The above list is provided for guidance purposes only; each case will be considered individually.