

Anti-Money Laundering

IPConcept (Luxemburg) S.A. (“IPConcept”) (Registre de Commerce et des Sociétés, Luxembourg: No. B 82183) complies with the following Anti-Money Laundering Policies and Procedures in order to avoid the exploitation of IPConcept (Luxemburg) S.A. for the purpose of money laundering and financing of terrorism:

IPConcept is subject to surveillance by the financial regulatory authority “Commission de Surveillance du Sector Financier” (CSSF). IPConcept is a licensed Management Company and Alternative Investment Fund Manager under Luxembourgish law. This license requires IPConcept to comply with Luxembourgish law and regulations regarding the fight against money laundering and financing of terrorism.

IPConcept complies with the written policies and procedures for the prevention of money laundering of the DZ PRIVATBANK S.A. and DZ BANK AG. IPConcept’s internal guidelines meet the requirements of the Luxembourgish law and regulations regarding the fight against money laundering and the financing of terrorism. These include internal control mechanisms, procedures and a yearly training program for the employees of IPConcept.

These policies and procedures are mandatory for all IPConcept operations, including crossborder operations. The observance of the internal guidelines, which implement policies and procedures, is supervised by an independent external auditing firm.

IPConcept’s internal policies and procedures meet the current recommendations of the FATF/GAFI. Luxembourg is a member of the OECD-Organisation FATF/GAFI (Financial Action Task Force on Money Laundering / Groupe d'action financière sur le blanchiment de capitaux). Luxembourg is also a member state of the European Union (EU).

The procedures require the filing of all relevant Know Your Customer (KYC) records. IPConcept will keep AML-records for at least five years after the business relation has ended.

Suspicious transactions must be reported to the Financial Intelligence Unit (FIU) of the Public Prosecutor of Luxembourg.

IPConcept does not provide or maintain accounts for “Shell Banks”.

All IPConcept shares are held by DZ PRIVATBANK S.A.

Should you require any further information do not hesitate to contact us.