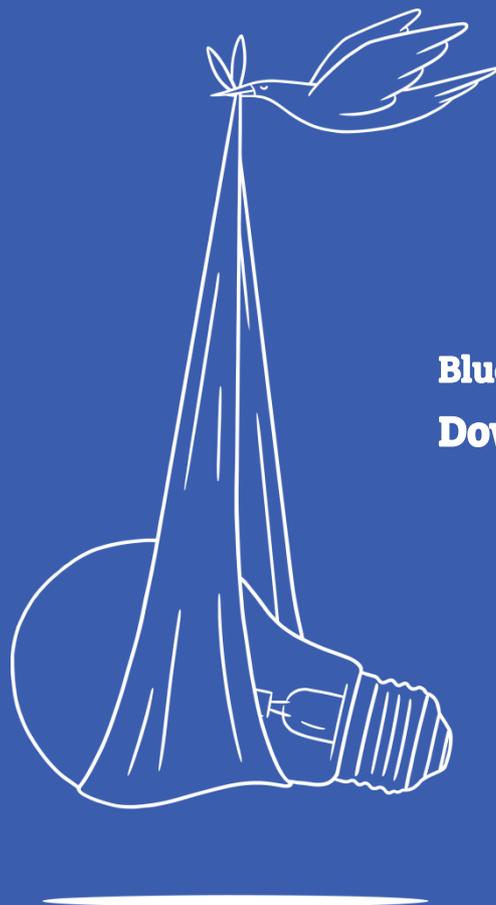


HARNEYS

Our Compliance Outsourcing Solutions



**Blue sky thinking.
Down to earth delivery.**



**Fresh thinking,
brighter ideas.**

The Compliance Challenge

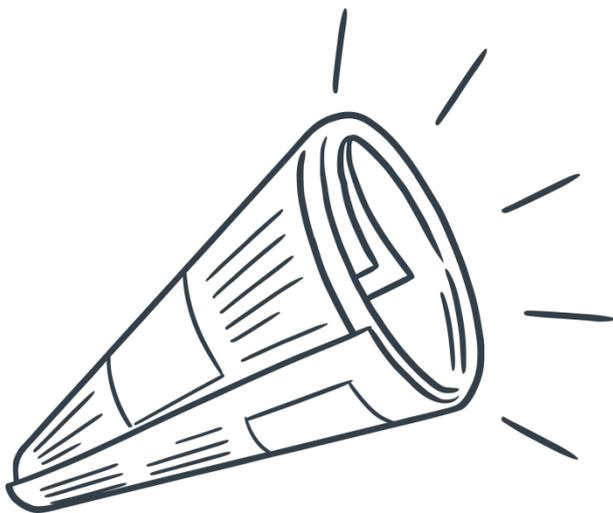
As a global offshore financial centre, the regulatory, AEOI reporting and compliance environment in the Cayman Islands is ever changing and evolving. The Cayman Islands Monetary Authority (**CIMA**) ensures that the Cayman Islands maintains its global position by introducing new legislation and sets the standard for global regulation. In doing so, we understand that it can be challenging for you to stay on top of and comply with the regulatory environment.

The Harneys Solution

The increased accountability means that you need to ensure your compliance management regime is in place and robust. A practical way to achieve this is to outsource compliance functions to a service provider who can discharge your obligations efficiently and cost effectively.

Our team of specialists understands your needs and offer high quality regulatory, compliance and FATCA/CRS (**AEOI**) outsourcing services.

We will tailor your solution to your specific needs. Our approach is characterised by excellence, responsiveness and price transparency.



**Facts not
fiction**



Our Services

*“Regulated and Unregulated Funds:
Now explicitly subject to AML Regulations”*

AMLCO/MLRO/DMLRO Services

CIMA has recently stipulated that all Cayman Islands domiciled funds, whether regulated or unregulated, and other entities performing “relevant financial business” are now required to appoint a “natural person” to fulfil the roles of Anti-Money Laundering Compliance Officer, Money Laundering Reporting Officer (**MLRO**) and Deputy Anti-Money Laundering Reporting Officer (**DMLRO**). These are management level roles and the responsibility of each appointment is substantial.

Our outsourcing solutions include the following:

Anti-Money Laundering Compliance Officer

- Assess the overall integrity and effectiveness of the AML/CTF systems and controls of the Fund’s investment manager and/or administrator (as the case may be) on a regular basis
- Review and maintain the Fund’s anti-money laundering and counter terrorist financing (**AML/CTF**) systems, controls, policies and procedures in accordance with the Cayman Islands anti-money laundering regime
- Report periodically to the Board or operator of the Fund on AML/CTF matters
- Maintain regulatory registers, as necessary
- Respond to requests from relevant reporting and regulatory authorities
- Complete appointment documentation and agreements

Money-Laundering Reporting Officer

- Review the suspicious activity reporting policies and procedures
- Review internal and external suspicious activity reports (**SARs**)
- Where applicable submit SARs to the appropriate authorities
- Maintain the suspicious activity register

Deputy Money-Laundering Reporting Officer

- Assume the responsibilities of the MLRO in their absence

Unravelling complexity



AML/KYC Services

Fundamental compliance obligations require that you “know your client” and are able to demonstrate robust client acceptance AML/KYC policies and procedures. You may need expert advice from AML/KYC specialists and our outsourcing solutions include the following:

- Collection, review and verification of your client’s/fund investor’s KYC identification documentation
- Sanctions, anti-money laundering, PEP and adverse media screening
- Regular ongoing monitoring
- provision of a secure e-mail drop box for your client’s/fund investor’s documentation

Automatic Exchange of Information Services

Foreign Account Tax Compliance Act (**FATCA**) and the Common Reporting Standard (**CRS**) for the Automatic Exchange of Information (**AEOI**) have had a profound impact on financial institutions. Harneys has been at the forefront of the AEOI regimes and can assist in how best to comply with your reporting responsibilities.

Our outsourcing solutions include the following:

- FATCA/CRS classifications
- FATCA/CRS obligations advice
- GIIN registration
- FATCA responsible officer
- Principal point of contact
- Authorised person
- Registration and reporting requirements

We can prepare:

- W-8BENs
- FATCA / CRS board resolutions
- XML schemas
- Annual filings

For more information visit:

<http://www.harneysfid.com/services/compliance/service/fatca-services>

Compliance Consultancy Services

Our compliance team delivers a suite of additional compliance services tailored to your individual needs, our services include:

- AML/CFT gap analysis
- Review and/or preparation of AML/CFT policies and procedures
- Regulatory inspection advice
- AML/CFT risk assessments
- AML/CFT training

Your Compliance Team

Kaft Taft

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Kate holds a Chartered Institute of Bankers qualification in Offshore Practice. Kate is a Certified Anti-Money Laundering Specialist in Compliance and Risk Management and a member of the Society of Trust and Estate Practitioners (STEP).

Hazel O'Brien

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Hazel O'Brien is a Business Manager in Harneys' Cayman Islands office. She is an automatic exchange of information (AEOI) specialist with Harneys Fiduciary (Cayman) Limited, an independent provider of specialised corporate, trust and fiduciary services.

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Lynn is head of RTA Services and Fiduciary Project Manager. She has extensive knowledge of company administration, corporate secretarial, directorship, share trustee and share registration services within the offshore industry.

Andrew Lee

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Andrew Lee is Compliance and Money Laundering Reporting Officer based in Harneys' Hong Kong office. He is also a member of the firm's Global Anti-Corruption Committee. Andrew has more than 13 years' experience in the legal industry in Hong Kong, ten of which were gained in the compliance field. He currently specialises in implementing BVI and Cayman compliance rules and regulations, including overseeing AML/CTF policies and procedures and undertaking due diligence in line with the firm's corporate, trust and fiduciary services.