

Appleby Trust (Isle of Man) Limited

Form Type:	New Business File Note
Ref:	Form 1
Pages:	Page 1 of 5

Date:		23/05/2013
Client:	Name:	Dr Nenad Popvic
	Address:	Switzerland
	Contact Details:	Via PWC Zurich
Introducer:	Name:	Andri Manatschal, PWZ Zurich
	Address:	Switzerland
	Contact Details:	andri.manatschal@ch.pwc.com ; Office: +41 58 792 4318, Mobile: +41 79 703 2645, Main: +41 58 792 4400
Name of Entity we are providing services to:		TBC – Two IoM Companies limited by guarantee,
Initial new business risk assessment (Formal CRA not required at this stage):	Please circle	Low /medium/high

Client Background

Set out in details background on the client, source of wealth, **and include results of any internet research conducted.**

See enclosed profile prepared by Simon Hall.

Background

Set out in detail any known background to the structure including details on all parties and include results of any research conducted.

PWC Zurich has been engaged to advise the client on the restructuring of his personal wealth and assets. See enclosed final structure notes from PWC.

Appleby Trust (Isle of Man) Limited

Form Type:	New Business File Note
Ref:	Form 1
Pages:	Page 2 of 5

Proposed Structure

Set out in detail the proposed structure and its purpose, expected assets, turnover, areas of operation, the advice on which is based (ie tax advice), any funding arrangements, any business plans, etc.

See attached tax advice issued by PWC. It is intended that we shall act as Reg Agent and Reg office to two IoM companies limited by guarantee. We shall also be providing Reg Agent and Reg Office services to a BVI company which shall be appointed as protector to the ultimate trust which is to be established in Hong Kong. ATIOML shall then also be acting as trustees to a purpose trust which will own the BVI protector company.

Services to be provided

Set out details of the services to be provided by ATIOML

Isle of Man Companies

Reg office & Reg Agent

IoM Purpose Trust

Trustees

BVI Company

Reg office & Reg Agent

Due Diligence Held

Set out below and attach details of all CDD held or requested.

We have received scanned copy due diligence in respect of all parties and are awaiting the originals. In addition we have performed enhanced due diligence on the UBO by way of independent research.

Appleby Trust (Isle of Man) Limited

Form Type:	New Business File Note
Ref:	Form 1
Pages:	Page 3 of 5

FATCA¹ Due Diligence – on any parties connected to the structure ***these questions must be answered***

1. Are there any US residents/citizens connected to the client - **No**
2. Are we to use or have on file a US residence or mailing address - **No**
3. A US place of birth - **No**
4. Are we to use or have on file a US 'in care of' address (PO Box addresses are not allowed to be used – but check in case of a business address) - **No**
5. Are there powers of attorney or signatories appointed with an associated US address - **No**
6. Are we to have any standing instructions to transfer funds to a US account - **No**
7. Are there any US telephone numbers - **No**
8. Does the client hold any assets in the US - **No**

Other Business & Risk factors

The UBO is a PEP and will need entering onto the PEP register and monitored accordingly.

Fees

Set out details of the proposed fees. Are any fees required in advance?

Incorporation of two Isle of Man companies:	£4,000
Annual Responsibility Fees for two companies:	£5,000
Establishment of an Isle of Man purpose trust:	£3,500
Annual Responsibility Fees for an Isle of Man purpose trust:	£2,000
Incorporation of a BVI company:	£1,500
Annual Responsibility Fees for a BVI company	£2,500

¹ The US foreign account tax compliance act (FATCA) was introduced Oct 2009. The FATCA regime falls on Foreign Financial Institutions (FFIs). It requires FFIs to provide the Internal Revenue Service (IRS) with information on certain U.S. persons. The FFI needs to identify an account has having any of the U.S. indicia in the above section

Appleby Trust (Isle of Man) Limited

Form Type:	New Business File Note
Ref:	Form 1
Pages:	Page 4 of 5

Issued by	Date
Aidan McCowliff	23/05/13
New Business Administrator or Senior Manager	

Recommendations and Comments of the New Business Committee

Authorised to proceed:	No
Conditions:	<ol style="list-style-type: none">1. Need to determine the exact assets and associated value held by the various entities in the structure so fully aware of precisely what we are entering into and any associated risks presented.2. It is noted that Mr P's business career made significant steps forward following his association with Marc Rich in 1995-1996. Mr Rich was previously indicted in the US for tax evasion and trading with Iran (Glencore). It is noted that in this same period he was apparently associated with Mr Rich he was also the President of Koalko International which entered into contracts with Glencore. Whilst there are no adverse reports the association to Mr Rich and Mr P's subsequent business progression should be noted.3. There are allegations of involvement with the construction or "Putin's Palace" in that an ABS subsidiary, Harvintar has participated in the construction which was allegedly funded by improper use of state funds. <p>In view of the above, and Mr P's categorisation as a PEP, it is recommended that the relationship is initially subject to quarterly reviews to ensure that we are entirely comfortable.</p>
Follow up required within 1 month:	Yes/
Timeframe for follow up if less than 1 month:	ASAP

Approved	Date
Sponsoring Partner or Executive Partner:	
Compliance:	

<i>Appleby Trust (Isle of Man) Limited</i>	
Form Type:	New Business File Note
Ref:	Form 1
Pages:	Page 5 of 5