



FINANCE & MEDIATION S.A.

UCITS V – new compliance requirements

Implementation and operating a whistle blowing procedure

Smart sourcing for all UCITS companies via www.whistleblowing.lu

By setting into force the new law of 10. Mai 2016 to implement the UCITS-regulation with article 32 the new article 149ter will be inserted into the law of 17. December 2010 about Undertakings in Collective Investments (UCI) Defined by paragraph (4) of this article, all UCITS, management companies, custodian banks and all entities engaged with the administration of UCITS have to implement a system to report conspicuous issues or breaches of rules among this law by their members of staff. This system has to be **specific, independent and autonomous.**

We deliver our new service offer „independent whistle blowing agent“, still well known in banks and in the UK, to UCITS and management companies in Luxembourg to be compliant within the new UCITS V directive as a whistle blowing procedure has to be provided.

FINANCE ET MEDIATION S.A. is established since nearly 20 years and acts as intermediary in the financial sector of Luxembourg with it's network about compliance, training und consulting. Our clients are banks, management companies of the investment fund industry, insurance companies and fiduciaires.

We are experienced in compliance for decades. Topics like anti money laundering / terrorism financing, data protection (appointed by CNPD, consulting, mandates as external data protection officer) as well to consult management companies to enable their compliance organisation and procedures up to date are our core competencies.

Your advantages

- Smart sourcing to fulfil a compliance relevant requirement
Implementation module: standard process documentation to be integrated into your compliance policy framework and presentation to instruct your staff and sourcing partner
- Trustworthy, anonymous and independent channel to handle your incidents by an external whistle blowing agent
- Confidential routing to the pre-defined contacts of your compliance-organisation
- Can be used as well among your value-chain of your outsourcing partners
- You use our experience of decades as your senior partner in all compliance issues

Our service offer

Module 1 – Implementation

- Providing the process documentation „Whistle blowing“ to be integrated into your organisation manual / compliance policy (by integrating your individual contacts identified, e.g. your compliance officer or your senior management responsible for compliance.
- Providing the presentation „Whistle blowing“ to instruct your staff members or to be integrated into your compliance trainings – of course specific trainings can be held by us upon separate request.

Module 2 – Operating

- Providing the anonymous external whistle blowing function
 - Identification of your company by your ID assigned
 - Communication channels:
mail, phone 24/7, www.whistleblowing.lu
 - Annual report: Overview about whistle blowing – incidents (specified reporting indicator mentioned in Section 6 of Impact study (SWD(2015) 293 final) of delegated Regulation (EU) 2016/438 of the Commission)
- Minimum contract duration: 3 years, prolongation afterwards automatically by 1 year

Are you interested? - Lets discuss.

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