

# PRIVATE PLACEMENT PROGRAMS DETAILED PROCEDURE –DR SUMEET SHARMA

## 1.- Personalized Analysis and Assessment

Our team of economists and lawyers will at all times be responsible for advising the client in a detailed and personalized manner. Depending on the clients assets, each case will be studied independently and the best way to proceed will be proposed with the key intention of completing the operation successfully.

Advice at all stages of the process: From the explanation of this kind of financial opportunity and how yields rise to the required banking and corporate documentation that the client should provide to be later presented at the Traders Office.

Possibility of carrying out any kind of face meeting in Madrid (Spain) or, if not possible, travelling to the city where the investor is. This last option will be available depending on the characteristics of the clients assets.

## 2.- Submission of Documentation

The client must provide all required documentation for the submission of the operation at the Traders office:

\* **SET Compliance:** After the initial contact with the client and after studying the viability of the operation, the client will be provided with the compliance set (Set of documents) for its proper completion and signature. For greater efficiency and ease, our firm will complete 90% of the compliance set so the client will simply need to review it and proceed to sign it.

\* **Passport:** DIN-A4 size and in any of the following formats: PDF, JPG, BMP or PNG.

\* **ASSET:** The Proof of Funds and all bank documents must be manually signed by two bank officials currently in charge of the client's account. Electronic signatures will not be accepted. In the case of documents requiring a verification by the Euroclear system/DTCC, it will be imperative to print the 12 pages. IMPORTANT: We do not accept any kind of procedure that prohibits all telephone calls from bank to bank, since this is necessary to verify and ensure that we are dealing with a real signer of the account and that funds and/or assets are not object of "leasing".

\* **Joint Venture Agreement:** Just as with the SET Compliance, when the proper time comes, the client we will provided with the "Commercial Agreement", that is determined and managed by the ICC 600.

## 3.- Due Diligence and Asset Verification

Once the operation is submitted at the Trader's office, we will immediately proceed to the verification of the assets and the realization of the "Due Diligence" (under study for acceptance) of the client and the submitted assets. The client must not be connected with the mafia, drug traffic, weapons, or any other illegal activity. Also, the asset must be good, clear, clean, with a non-criminal origin and must be freely available for the customer.

## 4.- Program Manager Contact

Once the previous inquires are successfully completed, within a maximum of 48-72 hours, the Program Manager will contact the client directly by phone. The aim of this call, in addition to the Program Manager's formal presentation, is to inform the kind of program the client will have access to, the profitability's, and also to agree on the different possible ways to block the assets

## 5.- Available Options to block the Assets

The investor will have to choose one of the two following available options to block the assets:

**1.- Swift MT-799 and MT-760:** The client's bank issues a Swift MT-799 prior notice and a Swift MT-760 lock to the bank the Trader appoints on the contract. The recipient of the MT-760 will be "the Trader's Company ". This option implies a higher cost for the client, but it is the classic one because it is more comfortable for the Trader.

**2.- Authorization to manage the account:** The client authorizes the Trader as a signatory to indistinctly manage the account where the resources are deposited, with the EXCEPTION of transferring funds from the account. The Trader's intervention at the client's bank will be solely and exclusively to request a letter to block the amount of invested funds. The client is the only signatory allowed to move funds. This option is more economical for the client, since it avoids the cost of Swift issuance and the time loss that bureaucratic procedures imply. This option is only possible if the client's account is a corporate account. In this case, the investor issues a corporate resolution for the trader, allowing him to manage the account as the financial director of the company. The corporate resolution must be notarized and his bank has to accept in writing (signed by two bank officers) the trader as account signatory. The client instructs to his bank internally that the trader is not authorized to making any transfers from the account, so that the client can be sure that his funds will never be moved. The funds are not used as collateral, they are not moved.

**IMPORTANT: Until the contract is signed by both parties, the investor does not acquire any obligation.**

**3.- Issuing of a Bank Guarantee:** If the client do not want to have the trader working from their account (or if it's a private and not a corporate account), or for those who don't want to block their funds, there is still the possibility that they might instruct their bank to issue a BG with the trader's company as beneficiary, and have this BG confirmed by swift MT 799 and blocked by MT 760, sent to the trader's bank. There is not risk for the client.

**4.- Transfer the Funds:** The client transfer the funds to the trader's account and he will receive a Bank Guarantee for the same amount to protect and guaranteed the funds. The client sends a swift 103/23 and received a BG from the trader. When the client receives the BG and his bank check the bg , the client release the swift 103/23. So there is not risk for the client.

**5.- EUROCLEAR / DTCC:** The investor will have to submit all the euroclear pages. This option will be available only if there is not any kind of restrictions of communication with the bank. Must be possible the total communication between bank officers. If there is any kind of restrictions this option will not be available.

## 6.- "Trading Contract" Firm

After the client and the Program Manager agree on the blocking way and clarify every possible matter that may arise on the conversation, the client will be offered several options to sign the Trading Agreement:

**Option 1.-** Signing the Trading Contract via email and later, when the signing for the opening of the customer's account takes place, the ratification of the Trading Agreement will be performed before the Trader. (Fast option)

**Option 2.-** The client and the Trader agree day and time to sign the Trading Contract in person. (This option is not available for all cases since it will depend on the characteristics of the submitted assets)

Once the Trading Contract is signed and the assets are locked, within a maximum of 15 banking days the investor will be submitted on the program

## 7.- Yields

**1.-** The Trader's office will proceed to a formal invitation for the collection of the first yields. On the invitation, the client will be informed of the day, time, place and bank venue where the Pre-Opened account will be located.

**2.-** The client goes to the appointment and proceeds to sign his/her account's operativity.or may get it in the account specified in the initial submission documents.

**3.-** The Trading Agreement will be ratified before the Trader. (Option 1 of Section 6)

**4.-** For the length of the program each opened account will be destined to the collection of yields.

The investment's benefits will be fully and freely available for the client ever since the outset.