

M. Case Comments		
Created By	Date	Comments
Josie Alonso	12/3/118 11:57 AM	Aromatiss S.A.S is 100% owned by Cosmo International Fragrances, S.L. U. former name, Cosmos Enterprises SLU - The change took place on 7/26/2018.
Dimitra Manley	12/4/118 8:21 AM	AFC has accepted the research attached for Juan Pablo Godoy Fajardo. The date format is listed as 03/12/2018. However, this research was conducted and attached to the KYC on 12/3/2018.
Dimitra Manley	12/4/118 10:06 AM	<p>This KYC serves as an EDR for Aromatiss S.A.S (herein referred to as accountholder), an existing Wealth Management client since April 2018.</p> <p>This EDR included the following changes:</p> <ol style="list-style-type: none"> (1) The addition of 3 UBOs, as beneficiaries of the Opus Futurus Foundation. (2) Update to loan signatories (per attached borrowing resolution). (3) Legal name change for an IBO: Cosmos Enterprises SLU changed its name to Cosmo International Fragrances, S.L.U. <p>Risk Factors Include:</p> <ul style="list-style-type: none"> • PEP Relationship: The UBOs are Relatives or Close Associates (RCAs) of a PEP due to their relationship with Gonzalo Aguirre Arriz, one of the founders of Coordinadora Nacional de Independientes, a political party established in Peru. Mr. Arriz is married to Janine Marion Belmont Dauelsberg. The PEP status was previously escalated (see attached escalation) • Source of Wealth (SOW)Industry: Juan Fernando Belmont Anderson (UBO) created Corporacion Yanbal International, a cosmetics company in Latin America. SOW Verification has been obtained. • Complex Structure: The ownership structure consists of multiple intervening layers. <p>Below are the reasons why we are comfortable with approving this KYC:</p> <ul style="list-style-type: none"> • Information and supporting documents required by our AML Policy were provided and reviewed; and as a result, we have an understanding of the structure of the accountholder, its purpose, the purpose of the account and expected activity. • The SOW was sufficiently detailed and appears plausible. Internet searches provided enough information to support the wealth for the prospective account holders and UBOs. <p>Below are the risk factors associated with the accountholder-</p> <ul style="list-style-type: none"> • Our review did not identify any red flags and thus there was no need to escalate this case further. • Due diligence searches were performed on all key and the names searched were not on any sanctions lists • The UBOs and a legal rep/signatory appeared in the ICIJ Database as being linked to Paradise Papers. However, the appearance of the name in ICIJ database alone does not require escalation if there is no other negative information that presents significant or material reputational risk. There was no adverse media on the account holder, UBOs, or legal reps to warrant further escalation.
Dimitra Manley	12/4/118 8:25 AM	The August 2018 Fircosoft alert generated for Jesus Armando Lema Hanke is the same alert generated in April 2018, when the account holder was on-boarded. BLAFC-WM previously reviewed and cleared the alert. The prior clearance (from April 2018) is attached to the KYC and covers the current alert.

ONSHORE APPROVALS			
Client Facing Professional (CFP):	Josie Alonso	(Signature) Josie Alonso	12/1/2018
Office Director/Business Head:	Eva Pace	(Signature) Eva Pace	12/3/2018
Regional Office Director:		(Signature)	
AML Business Risk:		(Signature)	
AML Compliance:		(Signature)	