



Grafton Oakwood



+48 571 034 070



ct@graftonoakwood.com



Mielżyńskiego 14, Poznań

Regulations & Compliance for Grafton Oakwood Holdings

Last updated: 21 November, 2024

This document sets forth the compliance framework, policies, and principles adhered to by Grafton Oakwood Holdings ("Grafton Oakwood," "we," "our," or "us") to meet its obligations under relevant financial regulations, including the Markets in Financial Instruments Directive II (MiFID II) and related legal frameworks. It is designed to ensure transparency, accountability, and investor protection while demonstrating our unwavering commitment to ethical and regulatory compliance.

Contact Information

Grafton Oakwood Holdings
Mielżyńskiego 14, Poznań, 61-725, Poland

KRS: 0000843217 | **NIP:** 784-25-63-947

Phone: +48 571 034 070 | **Email:** ct@graftonoakwood.com

Table of Contents

1. Purpose of the Document
2. General Financial Regulations Compliance
3. MiFID II Compliance Framework
4. Internal Financial Controls
5. Risk Management and Mitigation
6. Transparency and Reporting
7. Third-Party Relationships
8. Disciplinary Measures for Violations
9. Policy Review and Updates
10. Contact Information



Grafton Oakwood



+48 571 034 070



ct@graftonoakwood.com



Mielżyńskiego 14, Poznań

Regulations & Compliance for Grafton Oakwood Holdings

Last updated: 21 November, 2024

1. Purpose of the Document

The purpose of this Compliance Document is to:

- Outline the legal and regulatory frameworks that govern our operations.
- Provide detailed information on the measures we take to ensure adherence to MiFID II and other financial regulations.
- Define the rights and obligations of both Grafton Oakwood and its clients to foster a transparent and mutually beneficial relationship.

This document is intended for stakeholders, including clients, employees, regulators, and auditors, to provide a clear understanding of how we operate within the bounds of financial regulation and ethical standards.

2. General Financial Regulations Compliance

2.1 Anti-Money Laundering (AML) and Counter-Terrorism Financing (CTF)

Grafton Oakwood complies with the EU Anti-Money Laundering Directive (AMLD) and Polish Financial Supervision Authority (KNF) regulations to prevent illicit financial activities.



Grafton Oakwood



+48 571 034 070



ct@graftonoakwood.com



Mielżyńskiego 14, Poznań

Regulations & Compliance for Grafton Oakwood Holdings

Last updated: 21 November, 2024

- **Customer Due Diligence (CDD):** All clients undergo comprehensive identity verification, including the submission of valid government-issued identification, proof of address, and tax identification numbers. Enhanced due diligence is applied to politically exposed persons (PEPs) or high-risk jurisdictions.
- **Ongoing Monitoring:** We continuously monitor client transactions for unusual or suspicious activity using advanced analytics and reporting systems.
- **Reporting Obligations:** Any transactions suspected of money laundering or terrorist financing are promptly reported to the General Inspector of Financial Information (GIIF) in Poland.

2.2 Know Your Customer (KYC) Policy

Our KYC policies ensure compliance with AML laws while safeguarding clients and our operations from undue risk.

- **Purpose:** To verify the identity and risk profile of each client and ensure they meet eligibility criteria for engaging in investment services.
- **Process:**
 - Submission and verification of identity documents.
 - Financial background checks to assess the client's investment suitability and risk tolerance.
 - Cross-referencing against global sanctions and watchlists.

Failure to provide accurate or complete information may result in the suspension or termination of services.



Grafton Oakwood

+48 571 034 070

ct@graftonoakwood.com

Mielżyńskiego 14, Poznań

Regulations & Compliance for Grafton Oakwood Holdings

Last updated: 21 November, 2024

2.3 Tax Compliance

We adhere to Polish and international tax laws to maintain the integrity of financial reporting and ensure tax obligations are fulfilled.

- **Withholding Tax Compliance:** Proper withholding tax procedures are followed for all international clients, with clear documentation provided.
- **VAT and Corporate Tax Obligations:** We comply with Polish VAT regulations and corporate income tax requirements, ensuring timely submissions to the appropriate authorities.
- **Automatic Exchange of Information (AEOI):** We participate in global initiatives like CRS and FATCA to report relevant financial information for tax compliance purposes.

3. MiFID II Compliance Framework

MiFID II establishes a robust framework for the provision of investment services, focusing on transparency, fairness, and investor protection.

3.1 Scope and Applicability of MiFID II

As an entity providing investment and portfolio management services, we fully comply with MiFID II's regulatory requirements to ensure that our services are conducted in a fair, honest, and professional manner.



Regulations & Compliance for Grafton Oakwood Holdings

Last updated: 21 November, 2024

3.2 Investor Protection and Suitability Requirements

Investor protection is central to MiFID II. Key measures include:

- **Client Categorization:** Clients are categorized as Retail, Professional, or Eligible Counterparties. Retail clients receive the highest level of protection.
- **Suitability and Appropriateness Tests:** We assess the client's financial situation, investment objectives, and risk tolerance to ensure suitability for offered products.

3.3 Transparency in Fees and Costs

Clients receive clear, upfront disclosures about:

- **Breakdown of Fees:** Including management fees, transaction costs, and performance-based charges.
- **Aggregated Costs:** Periodic reports outlining the cumulative impact of fees on investment performance.

3.4 Best Execution Obligations

We ensure that all financial transactions are executed under the most favorable terms for clients, considering factors like price, speed, and execution quality.

3.5 Conflict of Interest Management

Policies are in place to identify, mitigate, and disclose any conflicts of interest, ensuring that client interests always take precedence.



Regulations & Compliance for Grafton Oakwood Holdings

Last updated: 21 November, 2024

3.6 Transaction and Trade Reporting Obligations

All trades and transactions are reported to the KNF and relevant EU authorities, ensuring market integrity and regulatory compliance.

3.7 Product Governance and Target Market Assessments

Products are designed and marketed to specific client profiles, ensuring that offerings align with the needs and expectations of the intended audience.

4. Internal Financial Controls

We have implemented comprehensive internal controls to safeguard assets, prevent fraud, and ensure accurate financial reporting:

- Segregation of Duties: Responsibilities are divided to reduce the risk of errors or misconduct.
- Independent Audits: Regular external audits ensure adherence to financial and regulatory standards.

5. Risk Management and Mitigation

Our risk management framework addresses operational, market, credit, and compliance risks through:

- Regular assessments and scenario analysis.
- Robust internal policies and procedures.



Regulations & Compliance for Grafton Oakwood Holdings

Last updated: 21 November, 2024

6. Transparency and Reporting

Transparency is maintained through compliance with IFRS standards and periodic disclosures to clients and regulators.

7. Third-Party Relationships

All third-party relationships are thoroughly vetted and monitored to ensure compliance with our internal standards and regulatory obligations.

8. Disciplinary Measures for Violations

Violations of these policies may result in:

- Internal disciplinary actions.
- Reporting to regulatory authorities where required.
- Termination of client or employee relationships.

9. Policy Review and Updates

This document is subject to periodic review and updates to reflect changes in applicable laws, regulations, and business practices.



Grafton Oakwood



+48 571 034 070



ct@graftonoakwood.com



Mielżyńskiego 14, Poznań

Regulations & Compliance for Grafton Oakwood Holdings

Last updated: 21 November, 2024

10. Contact Us

If you have any questions or concerns about the financial regulations and compliance, please contact us:

- Address: Mielżyńskiego 14, Poznań, 61-725, Poland
- KRS: 0000843217
- NIP: 784-25-63-947
- Phone: +48 571 034 070
- Email: ct@graftonoakwood.com

By engaging with our services, you acknowledge and agree to abide by these financial regulations and policies.

Regards,

Jean-Phillippe Wijnholds
CEO