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**From:** Bate, Louis (CBSF, Commercial & Institutional) <[Louis.Bate@natwest.com](mailto:Louis.Bate@natwest.com)>  
**Sent:** Tuesday, September 26, 2023 7:58 AM  
**To:** Matharu, Arjan (Structured Finance) <[Arjan.Matharu@natwest.com](mailto:Arjan.Matharu@natwest.com)>  
**Cc:** advisors <[advisors@riskbridge.com](mailto:advisors@riskbridge.com)>; Greenlees, Emma (CBSF, Commercial & Institutional) <[Emma.Greenlees@natwest.com](mailto:Emma.Greenlees@natwest.com)>; Lundberg, Michael (NatWest Markets) <[Michael.Lundberg@natwestmarkets.com](mailto:Michael.Lundberg@natwestmarkets.com)>  
**Subject:** Project Pompey - NatWest Hedging Onboarding Request

Hi Arjan,

I hope all is well with you.

We have laid out our onboarding / regulatory requirements below to trade interest rate derivatives with the borrower. We are reviewing the KYC pack in parallel and will share any follow-up requests in due course, noting that we will have a separate process to our lending team and cannot place reliance on their process.

Let me know if you have any questions.

Many thanks,  
Louis

We need some  
more information



Dear Sir/Madam,

Please note your onboarding reference number is: 300173838

In order to get **Gode Wind 3 Investor Holding GmbH** setup with the required products as quickly and efficiently as possible please assist in providing the requirements detailed below (or alternatively please permission us to access them via Markit).

These are regulatory requirements that we need to collect before we can provide you with our services.

Please can you also provide the below contact and LEI information?

**Client contact name :** Gode Wind 3 Investor GmbH

**Email:** [Punneet.grewal@glenmont.com](mailto:Punneet.grewal@glenmont.com)

**Telephone Number :** +442038924177

**LEI –** Already provided

## Action 1

### Canadian Derivative Reporting

We need to identify if you are in scope for Canadian Derivative Reporting. Please either;

- a. Complete the ISDA Canadian Representation Letter [here](#),
- or
- b. Confirm to us via email the following:

Whether your entity **is/is not** a Canadian Person (as defined in the ISDA Canadian Representation Letter available on [www.isda.org](http://www.isda.org)), and

**Not a Canadian person.**

Whether your entity **is/is not** an Affiliate of a Responsible Canadian Person - as described in Part II of the ISDA Canadian Representation Letter available on [www.isda.org](http://www.isda.org).

**Is not**

## Action 2

### ISDA U.S. SELF-DISCLOSURE LETTER

We need to understand whether your company has any relevant US connections that may bring you 'in scope' for Dodd Frank reporting requirements.

Please find attached the ISDA US Self- Disclosure Letter, which you are requested to complete and return. If you provide representation that you are a US Person, then we will be back in touch to request the completion of further documentation {Protocol 1 (P1) & Protocol 2 (P2)} as required by the Dodd-Frank Wall Street Reform and Consumer Protection Act.

**Please refer to ISDA schedules prepared for each lender by Freshfields**

## Action 3

### European Market Infrastructure Regulation (EMIR) Delegated Trade and Transaction Registration and Reporting Agreement

You will be aware of the requirement under EMIR to report all relevant transactions to a registered Trade Repository.

#### If you are an NFC- :

It is mandatory that Financial Counterparties (in this case NWM) reports on behalf of any Non-Financial Counterparties that have not reached the clearing thresholds (NFC-), that we enter into a transaction with, unless we are explicitly told otherwise by the NFC-.

Please **explicitly** inform us if you will be opting out of this reporting and will be self-reporting your transactions?

If you will not be self-reporting, in order for NWM to complete this reporting on your behalf, please reply to this email with your responses to the below questions:

- (a) What are the derivatives you trade with NWM used for?  
**Commercial Hedging**
- (b) Will you be the Ultimate Beneficiary of the derivatives you trade with NWM?  
**Yes**

- (c) When you trade derivatives with NWM, in what capacity will you be acting?  
**Principal (You will conduct trades on your own account)**

**If you are an FC, NFC+ or SFC:**

If you are not an NFC- entity (i.e. FC, NFC+ or SFC) NWM can still complete this reporting on your behalf for the transactions you contract with us. If so, please complete the **DTR Agreement**. Please note that the agreement covers both EU Legislation and UK Domestic law by virtue of the withdrawal agreement of section 3 of the European Union (Withdrawal) Act 2018

## Action 4

**European Market Infrastructure Regulation (EMIR) Classification Letter**

Please complete this [EMIR Classification Letter](#) so we can understand to what extent EMIR obligations apply to you.

For any guidance please refer to the explanatory letter [here](#).

## Action 5

**European Market Infrastructure Regulation (EMIR) Standalone Agreement**

Please confirm your agreement to the **attached document** which covers aspects of EMIR such as Timely Confirmation and Portfolio Reconciliation.

Please refer to page 10 of the agreement for interpretations and definitions.

## Action 6

**Regulatory Initial Margin (REG IM)**

You do not need to answer this question if your entity status for EMIR purposes is NFC- (non-financial counterparty below the threshold.)

We need to identify if you are in scope for Regulatory Initial Margin (REG IM). Please provide a response to the below question by replying to this email:

- (a) Would our trading relationship result in REG IM needing to be exchanged?  
Yes / No / Don't know

## Action 7

**CRS FATCA W8 / W9**

Please provide us with your W8 form, the link to which is included in the attached document.

**CRS Self Certification**

Please provide us with your Common Reporting Standard CRS self-certification form. The attached FATCA Cover Letter details the requirements along with the three versions of the CRS self-certification form, only one of which you will need to complete and return.

We look forward to hearing from you soon.

Kind Regards,



**Louis Bate**

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