



W1M Europe Organisational Summary

Organisational Summary

Board of Directors

Senior management are required to ensure that W1M EUROPE, A.V. S.A. (hereinafter, "W1MEU") applies robust governance arrangements, which include a clear organisational structure with well defined, transparent and consistent lines of responsibility. As well as effective processes to identify, manage, monitor and report the risks which W1MEU is or might be exposed to, it applies internal control mechanisms, including sound administrative and accounting procedures, effective control and safeguard arrangements for information processing systems.

Board of Directors of W1MEU

Chairman: Guy McGlashan (W1M Chief Executive Officer)
Vice Chairman: Pau Morilla-Giner (W1MEU Chief Executive Officer)
Dominic Crabb (W1M Chief Compliance Officer)

Company Secretary (non-executive)

Maria Gracia Rubio de Casas

Compliance and Risk Management

Compliance & Risk Management Officer: Carmen Artigas

Legal Advice & GDPR

Thomas Donlon
Amelia Acheson

Operations

Executive Director: Macarena Sanmartín

Investment Advisers

Pau Morilla Giner
Diego Pájaro
Todd Cowan

Compliance and Risk Management

W1MEU has established a unique unit responsible for the Compliance and Risk functions (Norm 4th paragraph 1, of the Circular 1/2014) and issues quarterly and annually joint reports (Norm 5th paragraph 3.6 and Norm 6th paragraph 3.9.4. of the Circular 1/2014).

The Compliance and Risk Management functions act independent and perform the functions of regulatory compliance and risk control.

The Compliance and Risk Management functions of W1MEU are undertaken by Carmen Artigas residing in Spain, with the support of the Group Compliance team in London. Dominic Crabb, a member of W1MEU's Board and Chief Compliance Officer of W1M, oversees the Compliance and Risk Management function.

A compliance monitoring plan has been established and will be reviewed on an ongoing basis and at least annually, as well as in accordance with changes in regulation or when other circumstances arise that require to adapt the plan.

The Risk Management function is carried out with the collaboration of Vivian Ng and Bryony Skinner both part of W1M Risk Management team, monitoring the adequacy and effectiveness of W1MEU firm's risk management policies and procedures.

Both the Compliance and the Risk Management function report quarterly and annually to the Board of Directors and on ad hoc basis if required at any time.

Internal Audit Function

The Internal Audit function assists the Board of Directors in its responsibility for the assessment and development of appropriate internal control systems for W1MEU. The Board of Directors of W1MEU has delegated the internal audit function to Aiblu Servicios Profesionales, S.L. (before Informa Consulting Compliance, S.L.)

The Internal Audit Function follows the Internal Audit yearly plan that is approved by its Board of Directors, which includes a review of the internal control systems and procedures according to the firm's risks and regulatory compliance requirements, evaluating their efficiency and effectiveness, by carrying out substantive tests on existing procedures and controls. The Internal Audit function makes relevant recommendations and subsequently corroborate compliance and effectiveness.

Two semi-annual reports are prepared throughout the year and submitted to the Board of Directors. The annual report is submitted to the National Securities Market Commission (CNMV).

Customer Care Function

The purpose of this function is to handle and resolve complaints and claims presented by its customers. W1MEU has approved and makes available at its webpage the Customer Care Code.



The Board of Directors of W1MEU has appointed Carmen Artigas, Compliance & Risk Management Officer, as Head of the Customer Care function.

Organisation Structure

W1MEU has an organization according to the needs required to carry out the investment services activities for which it is authorized by CNMV.



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