



Fact Sheet

Company name:	Schulz & Cie. GmbH
Contact data:	Feringastr. 12 A 85774 Unterföhring www.sp-consulting.co.uk compliance@sp-partners.de +49 (0)89-45242970-101
Managing Director:	Achim Schulz
Service Portfolio:	Compliance Services: <ul style="list-style-type: none">• Compliance as a Service• Outsourcing of Compliance functions
Founded:	29.08.2011
Legal form:	GmbH
QM Responsible:	Achim Schulz

Employees: Employees of the S&P Group

Guiding Principle: Explore the Best Full-Service Compliance

Clients: Financial companies
Non-financial companies

Company Certificates: Member of BRSI (Bundesvereinigung Restrukturierung, Sanierung und Interim Management e.V.)
DIIR - German Institute of Internal Auditing e.V.

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1. S+P Profile

We are active for our clients worldwide. You can find our offices in Munich and in London.

We provide compliance services for financial and non-financial companies.

Our mission statement:

Safe - Efficient - Fitting

Best Full-Service with S+P Compliance Services

1.1 Our QM and its scope

The area of application of the QM system relates to the entire company. It currently covers the scope of Compliance Services.

The following have been selected as the basis for certification

- DIN EN ISO 9001:2015

The quality management system is approved and put into effect by the company management. The validity of the system does not expire when changes or adjustments are made.

1.2 Our processes

This is what we're all about in all of our endeavors:

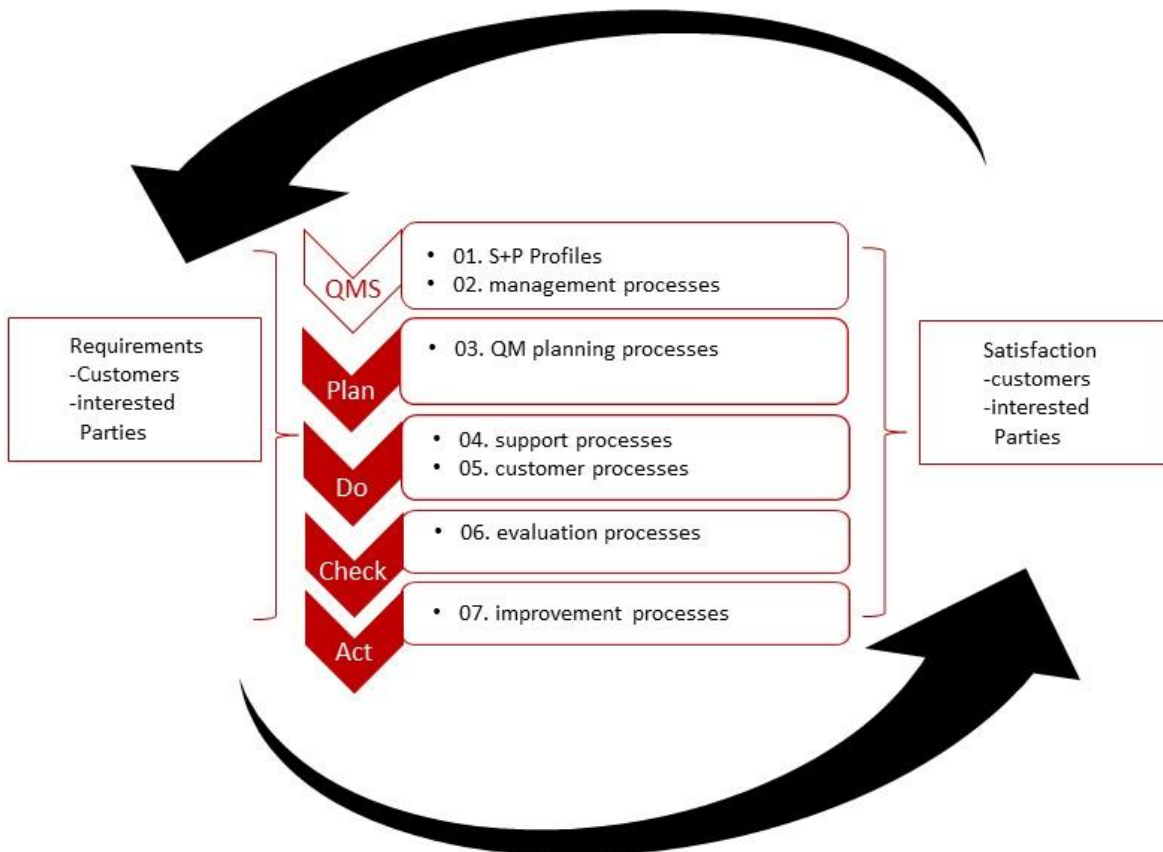
- meet customer requirements and
- comply with the statutory compliance obligations.

The core processes are:

- Onboarding outsourcing
- Preparation of the risk assessment as well as the internal security measures
- Transaction Monitoring

Understanding and controlling interrelated processes as a system contributes significantly to the effectiveness and efficiency of our business. It enables us to achieve the intended results. The interrelationships of the processes are controlled in such a way that overall performance can be continuously improved.

We achieve control of our processes and our QM system as a whole by adhering to the PDCA cycle. In planning, we keep "risk-based thinking" in mind in order to take advantage of opportunities and prevent undesirable outcomes.



We present the processes of our QM system in our so-called "process landscape".

FIGURE 1. PROCESS LANDSCAPE

In accordance with the standard, we have thus defined the sequence and interaction of the processes.

In this QM manual, the core processes are presented as follows:

1. Process responsibility
2. Process goal(s)
3. Measurement criteria/ key figures
4. Opportunities, risks and prevention
5. Documents (Documented information)
6. Points of intersection with other processes
7. Sequence/control (if necessary as flowchart)

2. Management processes

2.1 Management takes responsibility

As Managing Director, I, Achim Schulz, take responsibility for the effectiveness of the QM system in the company.

I hereby take responsibility

- for meeting my accountability obligations;
- to ensure proper management;
- to promote the use of the process-oriented approach and risk-based thinking in the team;
- to convey the importance of the effectiveness of the QM system and the importance of meeting customer requirements;
- of personnel in such a way that they can contribute to the effectiveness of the QM system;
- to promote improvement.

I am responsible for making sure that

- the quality policy and quality objectives are defined and consistent with the context and strategic direction of our company;
- the requirements from our chosen "QM model" are integrated into our business processes;
- the necessary resources are available and
- the intended results can be achieved.

Our customer orientation

Customers, as clients, are ...

- Finance Company
- Non-financial companies

We have an obligation to our customers. Therefore we determine

- their requirements, align them with our mission statement, and comply with applicable legal requirements;
- the risks and opportunities that may affect the suitability of our compliance services;
- their customer satisfaction and focus on improving customer satisfaction.

Advertising

Potential customers become aware of the company through advertising measures as well as recommendations from existing customers.

The company-specific marketing concept is reviewed and updated annually.

The website is designed to appeal in particular to decision-makers and, of course, potential customers.

Location and accessibility

Our company has locations in the following cities:

S&P Munich Office

Feringastr. 12 A

85774 Unterföhring

S&P London Office

37th Floor

1 Canada Square Canary Wharf E14 5AA London

Customer meetings take place remotely.

All requirements arising from the management of the company are taken into account:

- Legislation
- Supervisory requirements
- Instructions of the supervisory authorities

2.2 Mission statement and goals

The company's goal is to provide secure and efficient compliance services for our customers.

Together with the customers, we develop the best solutions and strategies for them in order to sustainably secure their compliance management.

Our quality policy is based on the QM principles of DIN EN ISO 9001:2015.

ISO 9001:2015

- o Customer orientation
- o Leadership
- o Engagement of individuals
- o Process-oriented approach
- o Improvement
- o Fact-based decision making
- o Relationship management

We derive the following quality principles for our Compliance Services, for our customer processes, from these QM principles:

- **Safe - Efficient - Suitable**
- **Best Full-Service with S+P Compliance Services**

2.3 Roles, responsibilities and authorities

Achim Schulz is responsible for all company matters as Managing Director.

There are task descriptions for the hired employees that regulate the objective, qualification requirements as well as activities with responsibility and authority.

3. QM planning processes

3.1 Measures to deal with risks and opportunities

In all planning within the framework of our QM system, we take into account the topics mentioned in the following sections.

In doing so, we determine the risks and opportunities, which we treat accordingly. We use the following instruments for risk analysis

- the strengths and weaknesses analysis.

We take preventive measures to prevent undesirable effects for the identified risks by

- Avoiding risks,
- taking a risk to seize an opportunity,
- Eliminating sources of risk,
- changing the probability of occurrence or the consequences,
- making an informed decision to share or retain risk.

The opportunities identified can help us make improvements and reinforce desired outcomes. This is done, for example, through

- Use of new techniques,
- Market introduction of new services,
- Development of new markets,
- New Customer Acquisition,
- Building partnerships and
- Other viable options.

3.2 Quality objectives and their planning

We derive measurable quality objectives from our primary quality objectives for all relevant functions, levels and processes at least once a year. These are:

- Customer satisfaction
- Competence development
- Economic efficiency
- Process improvement
- Compliance Security

In order for these to be realized, corresponding measures are planned, which include responsibilities and time targets.

The implementation of the quality objectives is continuously reviewed during the year and systematically, once a year as part of the management review, an evaluation of the results takes place.

3.3 Change planning

If there should be necessary changes to our QM system, then the following should be considered

- the possible consequences;
- the effectiveness of our QM system;
- the availability of resources;
- the assignment or reassignment of responsibilities and authorities.

4. support processes

4.1 Resources

The aim of providing sufficient resources for the QM system is maintaining, developing and constantly improving the effectiveness of the QM system while meeting customer requirements and thereby increasing customer satisfaction.

Consistent training and development planning and its verifiable implementation and effectiveness review are essential cornerstones that ensure performance quality in the company.

The company works with hired employees from the S+P Group. The company management ensures with suitable measures that all persons entrusted with quality-relevant activities are trained and instructed and thus have sufficient knowledge for the execution of their activities.

Infrastructure and process environment

Infrastructure is identified, provided and maintained.

Special research tools and leading trade publications are used for optimal quality assurance.

These are currently

- Dow Jones Risk Monitoring Tools
- Thomson Reuters Regulatory Tools
- VWD market data and company analyses

35 T€ p.a. are spent currently on quality assurance with the help of research tools and specialist publications.

Resources for monitoring and measurement / measuring devices

Various test points are integrated into our processes in the interests of the PDCA cycle. It is therefore defined who, when and which tests have to be carried out.

The monitoring and measurement results show us and our "Interested Parties" that we meet the specified requirements. The following measuring instruments are used, for example:

In Compliance Services:

- four-eyes principle within the framework of the risk assessment run-out control
- Automated checks with our digital tools

Knowledge

The company management provides the complete knowledge that is required for the organizational structure and process organization in the company. This is where the special opportunity lies, but also the high risk.

Involving external partners and further development of internal employees according to their skills are therefore the most important goals.

The knowledge of all those working in the team must be maintained and made available to the extent necessary. We are working on this incessantly.

This refers in particular to knowledge that has been acquired specifically for the company through experience. This includes in particular

- spiritual property of each of us,
- Lessons learned from mistakes and successful projects,
- results from improvements in processes and services.

We collect this information through our process evaluation, employee job descriptions, and consultant profiles.

4.2 Competence

As Managing Director, I systematically determine resource requirements together with our team leaders. I provide the necessary resources to continuously improve customer satisfaction and the effectiveness of the QM system. All legal requirements are complied with in the process.

Every employee has a contract and a job description in which the qualification requirements and tasks are listed. The selection of new personnel is made by me as the company management. The employees are trained by me in the designated areas of responsibility and in the QM system.

I determine my own and our employees' individual training requirements on the basis of their future area of responsibility and the statutory and regulatory requirements.

In the determination of requirements, the qualification is determined with the task profile, taking into account the results of customer satisfaction, based on the following criteria:

- identified gaps,
- new technologies and developments,
- Supervisory Requirements,
- existing weak points,

- Refreshing previously acquired knowledge.

The qualification measures are directly integrated into the daily work routine, so that their effectiveness can be measured immediately.

An extensive specialist library is available to employees for the continuous expansion of their skills.

Long-term planning of seminars is part of the management assessment. They are aligned with the quality objectives.

4.3 Awareness

New employees are briefed on the quality policy and quality objectives during the induction phase. They will be informed promptly about the results of the management review and, in connection with this, about the review of the quality policy and the quality objectives as well as the planning of the new quality objectives.

All parts involved are aware that they contribute significantly to process improvement and thus to the success of the company.

The company management motivates all contributors to uncover errors and to make their ideas for improvement known loudly, and in particular to see suggestions and complaints from customers as an opportunity.

All employees of the company are aware that the regulations of the QM system must be implemented in a binding manner and that deliberate non-compliance will have consequences under labor law or contractual law.

4.4 Communication

The company structure means that QM responsibility lies in the hands of the company management.

Internal communication takes place with employees in Compliance Services on an order-by-order basis.

In addition, the Compliance Team meets weekly in remote meetings.

In all meetings, the effectiveness of the QM system is determined with the aim of constantly improving the processes.

4.5 Documented information

General

All individual processes are described in detail in our QM documentation. The processes are continuously monitored, analyzed, evaluated and their effectiveness constantly improved. The interfaces are regulated within the processes.

The originals of all quality management system documents are stored centrally in the Unterföhring office.

In ISO 9001:2015, such a QM manual is no longer explicitly required. Nevertheless, we have decided to use this form of presentation in order to give our new prospects, new employees and fee consultants a quick company overview.

Overall, our QM documentation is therefore composed of

- the QM manual and
- the processes described in the QM manual.

Documents

The documentation structure is kept simple. We have deliberately refrained from the traditional classification, e.g. QMH (QM manual), PB (process description), AA (work instruction), CL (checklist).

Process descriptions, work instructions and checklists are prepared on a client-by-client basis for each outsourcing arrangement. This takes into account the regulatory requirements for the proper organization of business.

Our QM manual is divided into chapters, clearly showing the structure of ISO 9001:2015. We are aware that the new standard does not expect this and leaves us free to decide how we want to present our QM system in the documentation.

We have structured our QM manual as follows:

1. S+P Profile
2. Management processes
3. QM planning processes
4. Support processes
5. Customer processes

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6. Evaluation processes
 7. Improvement processes

Document control (documented information)

The control of target documents (TARGET) and records (ACTUAL) is carried out according to the following guidelines:

- All documents have been reviewed prior to their release
- Documents are updated as needed
- The current processing status is indicated by
 - Edit date
 - Version designation
- Only current and approved documents are used
- The origin and steering of external documents is recognizable
- EDP preliminary documents and records fulfill the following aspects
 - Labeling
 - Storage/Protection
 - Recallability/readability
 - Determined retention periods, compliance with legal requirements
 - Filing in SharePoint

I am responsible for the control of the standard documents and records as the managing director.

5. Customer processes

5.1 Operational planning and process control

General

The service processes are planned and systematically controlled according to their respective specific requirements. Consistent defined processes ensure this.

The S&P profile and the requirements of our "Interested Parties" are the basis for process planning and control.

An important planning tool is, of course, our schedule. As a rule, the schedule is three to six months ahead.

Optimization processes

When planning services, the requirements of the QM manual and the principles derived from it are observed and assured.

If this results in the need for changes, an adjustment is made to ensure continuous optimization.

5.2 Development

The company Schulz & Cie. GmbH approaches the customers in an open-minded and competent way. The expectations of the customers are received in a friendly manner and aligned with our mission statement.

If the customer expectations do not match the services of our company, the order will not be accepted.

The order inquiry from interested parties is followed by the submission and coordination of an offer, right through to the drafting of the contract.

If the requirements for services change, we ensure that the relevant documents are adapted accordingly and that the relevant employees or instructors are made aware of the changed requirements.

Of course, our most important concern is to satisfy our customers. However, if we have failed to do something, we welcome the opportunity for improvement triggered by voiced customer complaints.

Customer complaints are handled promptly and customer satisfaction is determined after the fact.

Communication with the customer

Key aspects of communication with customers are:

- a qualified initial consultation of the customers
- an initial analysis to verify existing wishes and requirements
- identifying specific needs for compliance services

Our goal is to provide customers with secure, efficient and appropriate compliance services.

5.3 Development

One of the principles of Schulz & Cie. GmbH is to fulfill individual customer wishes with a high degree of flexibility, provided that the wishes fit the mission statement of our company.

New or changed services are carried out in accordance with the ISO standard according to requirements (planning, inputs, control, results, changes).

The PDCA cycle is used to check the effectiveness of concept creation (verification), concept implementation (validation), project results, and improvement actions/changes taken.

Optimization processes

The requirements for the compliance services are determined together with the customers. The requirements identified with the needs analysis provide the conditions for the compliance program.

The client goals are set according to this planning and the necessary qualification for the consultant is determined as a result.

5.4 Externally procured products and services

Procurement refers to all activities aimed at acquiring and developing our know-how, as well as the procurement of materials required to provide a high-quality service.

Knowledge Acquisition

The acquisition of knowledge and experience that can lead to new compliance services is based on:

- results of basic research / studies
- Primary and Secondary Literature
- application-oriented knowledge
- practical experience

Procurement of office equipment and materials

Procurement is carried out under defined quality requirements.

The regular suppliers are listed and their performance is reassessed on an ad hoc basis and annually as part of the management review.

External service providers are:

- IT service providers and network administrators
- provider of monitoring tools and research databases
- provider of research tools

The order is placed via offer acceptances for the commissioned services. Working methods, process flows, equipment and release regulations are clarified.

Schulz & Cie. GmbH reserves the right to conduct a supplier audit if necessary.

5.5 Performance of the contract service

General

In order to make it known to the outside world and particularly to the consultants who are on sight, we:

- provide the necessary documents showing the planned structural, process and outcome quality
- provide suitable means for monitoring and measurement
- conduct monitoring and measurement activities at appropriate stages to determine whether service requirements are being met,
- carry out error-preventive measures,
- carry out approvals or show the processing status.

The requirements of ISO 9001 are complied with.

Service

The service realization is a concept or a service offer. This verifiably defines which compliance services are to be carried out at the future client in time-limited and organized processes.

The solutions are operationalized through implementation concepts. This is always accompanied by decisions on goal definition, content structuring, choice of methods and use of media.

The methods used in the measures are designed to fit the client's needs.

Phases in compliance onboarding

The service delivery process is structured into the following four information processing phases (IVP):

1) Initial phase

This is the beginning of the compliance onboarding process. The organizational framework is agreed with the client. Project goals are agreed with the client.

2) Durative phase

The duration phase is about defining the compliance services through a deeper examination of the interfaces. A service level agreement is drawn up for this purpose.

3) Practice phase

The practical implementation is supported by the development of our own models and the principle of market and user orientation strongly appears in the foreground.

4) Conclusion phase

This completion and rounding phase includes facilitating and transferring the knowledge gain with the newly acquired analysis and implementation results.

Documentation of the Compliance Services

The elements of content, methods and project objectives are recorded in a risk assessment and Compliance Management organizational manual. Decisions on defining objectives, structuring content, selecting methods, and using media are documented.

Customer and service provider property

We are careful with the property of the customers.

Separate confidentiality and compliance declarations apply to the information and documents provided.

Preservation of services

Schulz & Cie. GmbH secures the results achieved. This applies to all business areas.

For example, logs, chat transcripts, conversation notes, and other information are documented, thereby recording the results.

The documents to be created in the course of order fulfillment are clarified with the customer in advance. These are therefore essential proofs of conformity.

Thus, we carefully observe their preservation, marking, handling and, if necessary, their appropriate storage, for the period agreed with the customer.

Monitoring changes

If changes are required to service delivery, we review the scope and manage processes accordingly to meet the new requirements.

5.6 Authorization of services

I am solely responsible for the authorization of services as the company's management.

I define the control and audit program based on legal and regulatory requirements.

5.7 Control of erroneous results

Early detection is intended to prevent the recurrence of defects and quality deficiencies that have already been identified. All those involved are aware of this.

The requirements for the control of defectively provided services are regulated in this QM manual.

6. Evaluation processes

6.1 Monitoring, measurement, analysis and evaluation

Schulz & Cie. GmbH determines the methods and the respective time for monitoring, measurement, analysis and evaluation in order to thereby ensure the desired results.

Corresponding verification documents are created and kept in this context.

Customer satisfaction

Schulz & Cie. GmbH is customer-oriented. The customers with their consulting needs are the focus of our thinking and acting.

We conduct customer surveys at regular intervals to determine customer satisfaction.

Customer satisfaction is determined by evaluating various indicators, such as service quality, complaints and grievances, and information from direct customer contacts (e.g., remote meetings).

Data Analysis

In order to achieve an improvement in quality, we use suitable key figures (as a tool) for quality control.

The application is used to determine key figures in order to obtain concrete information on the effectiveness of the QM system, e.g. on customer satisfaction, measures for dealing with risks and opportunities.

6.2 Internal audit

We prepare an audit program at the end of each fiscal year for the following year. The audit program includes an internal (to improve internal processes) audit.

All audit reports are evaluated in the annual management review.

6.3 Management review

A management review takes place at least once a year.

It is used to review the suitability, appropriateness and effectiveness of the QM system. Possibilities for improvements to the QM system, quality policy and quality objectives are identified.

A data pool lists the indicators that represent the inputs for this. The following is considered, among other things:

- the status of measures from previous management reviews;
- Changes in external and internal issues affecting the quality management system;
- Information on the performance and effectiveness of the quality management system, including developments in:

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- customer satisfaction and feedback from relevant interested parties;
 - the extent to which quality objectives have been met;
 - Process performance and conformity of services;
 - Nonconformities and corrective actions;
 - Results of monitoring and measurements;
 - Audit results;
 - performance from external providers;
- the adequacy of resources;
 - the effectiveness of measures implemented to deal with risks and opportunities
 - opportunities for Improvement.

The results of the management assessment are summarized in a report. The results form the basis for planning the new annual quality targets.

The report contains decisions and measures

- to improve the effectiveness of the QM system and its processes,
- to improve performance in relation to customer requirements,
- to resource requirements.

7. Improvement processes

7.1 General

Schulz Cie. GmbH uses every opportunity for improvement to meet customer requirements, increase customer satisfaction and further develop its services.

Complementing ongoing improvement efforts, we are open to innovation and breakthrough change.

7.2 Unplanned and corrective actions

It is part of the Schulz & Cie. GmbH philosophy to investigate all errors in order to minimize the occurrence of similar problems in the future and thus to constantly work on improvement.

Corrective and preventive actions represent an important quality feature in all operations and processes. Corrective actions can be take place as a result of customer complaints, errors discovered by employees (non-conformity), internal audits, external audit results and management review.

All necessary corrective actions, including their implementation and control, as well as their results and assessments, are documented. The risks and opportunities determined during planning are updated accordingly.

The effectiveness of the corrective actions is reviewed by me as management.

The requirements for the control of corrective actions are regulated in a process description.

7.3 Continuous improvement

We are motivated to continuously improve the suitability, adequacy and effectiveness of our QM system.

We consider the results from analyses and assessments, as well as the results of the management review, when determining needs or opportunities to be addressed as part of continuous improvement.

8. Enactment

With the release of the Handbook Quality Management, Version 2.0, the Quality Management System of Schulz & Cie. GmbH has been updated and continued.

Munich, 05.03.2022

Signed by Managing Director

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Achim Schulz, Managing Director