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## Project Runway - Know Your Third Party Reports

Part I: Shanghai Yiqian Trading Co., Ltd.

(上海裔谦贸易有限公司)

including [REDACTED]

and [REDACTED]

Dated 20 April 2016

Part II: Shanghai Guoqing Investment Co., Ltd.

(上海国清投资有限公司)

including [REDACTED]

Dated 30 May 2016

Part III: [REDACTED]

Dated 30 May 2016

These are short form reports based exclusively on a range of public records data sources available from the desktop on the relevant cut-off date. Additional relevant information may be revealed through a review of other information sources, including manually-held public records or local enquiries. These reports should not be relied upon exclusively as the basis for taking or refraining from taking any business decision. These reports are prepared for Ministerium des Inneren und für Sport Rheinland-Pfalz under the terms of our engagement Letter dated 29 January / 22 February 2013 and are strictly private and confidential. These reports may not be disseminated to any third party without the express prior written consent of KPMG Rechtsanwaltsgesellschaft mbH.

## Engagement

With E-Mail dated 19 August 2015 and based on our Engagement Letter dated 29 January / 22 February 2013 Ministerium des Innern, für Sport und Infrastruktur Rheinland-Pfalz (today Ministerium des Innern und für Sport, subsequently "Client") appointed KPMG Rechtsanwaltsgesellschaft mbH to undertake limited research in relation to the background and integrity of Client's potential business partner Shanghai Yiqian Trading Co., Limited (上海裔谦贸易有限公司, subsequently "SYTCL") and its shareholders and legal representatives, subsequently referred to as "Know Your Counterparty" or "Know Your Third Party" Reports.

After completion of a first Know Your Third Party Report about SYTCL and its shareholders and legal representative on 20 April 2016 (**Part I** of this report), we have asked SYTCL for several clarifications, in the course of which SYTCL announced and provided proof of a new shareholder structure.

Having verified the respective proof, we have added two additional Know Your Third Party Reports about the two new shareholders of SYTCL \_\_\_\_\_, also legal representative and shareholder ( \_\_\_\_\_ percent) of Shanghai Guoqing Investment Co. Limited (上海国清投资有限公司)) (**Part II** of this report) and \_\_\_\_\_ (**Part III** of this report).







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As a result, this Know Your Third Party Report about SYTCL consists of the following parts:

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<b>Part I</b>	Know Your Counterparty Report on Shanghai Yiqian Trading Co., Limited (上海裔谦贸易有限公司) including a. o. _____, registered shareholder of SYTCL, and _____ as legal representative <b>Dated 20 April 2016</b>	4
<b>Part II</b>	Know Your Third Party Report on Shanghai Guoqing Investment Co. Limited (上海国清投资有限公司) including a.o. _____, registered shareholder of SYTCL <b>Dated 30 May 2016</b>	28
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## Summary

Risk indicators Shanghai Yiqian Trading Co., Limited		
Area	Indicator	Details
Background details		<p>SYTCL's basic background details were confirmed through research of the BCISS-SAIC, the Shanghai AIC, the National Administration of Code Allocation to Organizations ("NACAO") website, Shanghai Municipal Office, State Administration of Taxation (SAT) website, and other online sources. No discrepancies were identified between these sources.</p> <p>Initial discrepancies between the information provided in the Due Diligence Questionnaire from 2 March 2016 and the information available in the sources named above regarding the date of incorporation and the company's business activities could be clarified by means of a Legal Opinion by the Chinese Law Firm Jingtian &amp; Gongcheng dated 27 May 2016 as well as an updated excerpt from the public register of the Shanghai Jing'an Market Supervision and Administration Bureau.</p>
Shareholders		<p>Registered shareholders of SYTCL are:</p> <ul style="list-style-type: none"> <li>■ _____ shareholding</li> <li>■ _____ shareholding</li> <li>■ _____ shareholding</li> </ul> <p>Initial discrepancies between the information provided in the Due Diligence Questionnaire from 2 March 2016 and the information available from the sources named above regarding SYTCL's shareholders became obsolete after SYTCL changed and provided proof of its new shareholder structure and legal representative by means of a Legal Opinion by the Chinese Law Firm Jingtian &amp; Gongcheng dated 27 May 2016 as well as an updated excerpt from the public register of the Shanghai Jing'an Market Supervision and Administration Bureau.</p> <p>Research identified references to individuals named _____ and _____ two common names in China, who were subject to legal enforcement and lawsuits in China. However, due to the lack of further identifying information and prevalence of these names, it could not be confirmed if any of these individuals is the same as the individuals identified in this report. We suggest to contact _____ and _____ directly in order to clarify whether any of both individuals are the same as one of the individuals identified in legal enforcement actions and lawsuits.</p>
Adverse press/ media comment		SYTCL has a low public profile. No adverse information was identified in relation to SYTCL through research of available online sources.
Litigation		No litigation filings were identified in relation to SYTCL through research of available online litigation records.
Sanctions and high-risk entities lists		No references to SYTCL were identified in published lists of entities subject to international economic sanctions or in other available lists of high risk entities.
Director information		According to the BCISS – SAIC and confirmed by a Legal Opinion by the Chinese Law Firm Jingtian & Gongcheng dated 27 May 2016, _____ the legal representative of SYTCL. No adverse information or litigation filings were identified.



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## Part I

### Shanghai Yiqian Trading Co., Limited

(上海裔谦贸易有限公司)

Know Your Counterparty – Due Diligence

20 April 2016\*

**\*Information Update as of 30 May 2016:** The key findings and risk indicators in this Know Your Counterparty Report dated 20 April 2016 were discussed with SYTCL and – after announced changes in the shareholder structure of SYTCL – could be clarified by means of a Legal Opinion by the Chinese Law Firm Jingtian & Gongcheng dated 27 May 2016 as well as an updated excerpt from the public register of the Shanghai Jing'an Market Supervision and Administration Bureau. Thus, the overall risk indicator as of 30 May 2016 could be reduced (see overall summary on page 3).



## Key findings

According to the Business Credit Information Search System of Enterprises in China ("BCISS"), an enterprise credit information network maintained by the State Administration of Industry and Commerce ("SAIC") which provides corporate information, Shanghai Yiqian Trading Co., Limited (上海裔谦贸易有限公司) ("SYTCL" or "the company") was incorporated in November 2013 in Shanghai, China. SYTCL sells construction materials, textiles, office supplies, various electronic products, electrical and mechanical equipment and general merchandise.

According to the BCISS – SAIC, [redacted] and [redacted] each hold a 50 percent share of SYTCL. The information was taken from the 2015 Annual Report of the company filed with the SAIC on 25 January 2016. However, according to the due diligence questionnaire as filled out by SYTCL, the shareholders of the company are [redacted] (26 percent), [redacted] (25 percent), [redacted] (20 percent), and [redacted] (5 percent). In addition, in the Due Diligence Questionnaire from 2 March 2016 it is listed that [redacted] is the sole shareholder. This information could not be independently confirmed through research of other available online sources. According to SYTCL, [redacted] will be the new majority shareholder of Shanghai Yiqian Trading Co. Ltd. However, his association with Shanghai Yiqian and information regarding his ownership in the company could not be confirmed from the research of available online sources. No adverse information was identified in relation to the above-mentioned shareholders of SYTCL.

SYTCL has a low public profile. References to the company in online public sources primarily relate to its business activities. No adverse information or litigation filings were identified in relation to SYTCL.

According to the BCISS – SAIC, [redacted] is the Legal representative, executive director and manager of SYTCL. According to the Due Diligence Questionnaire from 2 March 2016 the key individuals of the company are [redacted] (Chairman), [redacted] (President) and [redacted] (Executive Director). [redacted] and [redacted] have been profiled as a part of the report. No adverse information or litigation filings were identified in relation to above mentioned individuals of SYTCL.

Research identified references to individuals named [redacted] who were subject to legal enforcement and lawsuits in China. However, due to the lack of further identifying information and prevalence of the name, it could not be confirmed if any of these individuals is the same as the individual identified in this report.

No references to SYTCL or the aforementioned individuals were identified in published lists of entities or individuals subject to international economic sanctions or in other available lists of high risk entities.

The Company Due Diligence Questionnaire was filled in for a company that does not act as the bidder. Only on demand the Company Due Diligence Questionnaire was handed in later for the bidding company on 2 March 2016. The information provided in the Company Due Diligence Questionnaire from 2 March 2016 concerning the shareholder structure does not match the information found in open sources. We judge these two facts as highly critical (red flag). In addition, some further information such as the date of incorporation or the key individuals of the company given in the Due Diligence Questionnaire from 2 March 2016 could not be confirmed through research of available online sources.

Overall risk indicator: **HIGH\***

**\*Information Update as of 30 May 2016:** The key findings and risk indicators in this Know Your Counterparty Report dated 20 April 2016 were discussed with SYTCL and – after announced changes in the shareholder structure of SYTCL – could be clarified by means of a Legal Opinion by the Chinese Law Firm Jingtian & Gongcheng dated 27 May 2016 as well as an updated excerpt from the public register of the Shanghai Jing'an Market Supervision and Administration Bureau. Thus, the overall risk indicator as of 30 May 2016 could be reduced (see overall summary on page 3).



## Summary of findings



## Risk indicators: Shanghai Yiqian Trading Co., Limited

Area	Indicator	Details
Background details		<p>SYTCL's basic background details were confirmed through research of the BCISS-SAIC, the Shanghai AIC, the National Administration of Code Allocation to Organizations ("NACAO") website, Shanghai Municipal Office, State Administration of Taxation (SAT) website, and other online sources. No discrepancies were identified between these sources.</p> <p>Discrepancies such as the date of incorporation and the activities were listed however in the Due Diligence Questionnaire from 2 March 2016.</p>
Shareholders		<p>_____ and _____ each hold a 50 percent share of SYTCL. The information was taken from the 2015 Annual Report of the company filed with the SAIC on 25 January 2016.</p> <p>However, according to the due diligence questionnaire as filled out by SYTCL, the shareholders of the company are _____ (26 percent), _____ (25 percent), _____ (20 percent) and _____ (5 percent). In the Due Diligence Questionnaire from 2 March 2016, _____ supposed to be the sole shareholder. However, this information could not be confirmed through research of other available online sources.</p> <p>Research identified references to individuals named _____ who were subject to legal enforcement and lawsuits in China. However, due to the lack of further identifying information and prevalence of the name, it could not be confirmed if any of these individuals is the same as the individual identified in this report.</p> <p>According to SYTCL, _____ will be the new majority shareholder of Shanghai Yiqian Trading Co. Ltd. However, his association with Shanghai Yiqian and information regarding his ownership in the company could not be confirmed from the research of available online sources.</p> <p><b>Information Update as of 30 May 2016:</b> The above findings regarding the shareholder structure were discussed with SYTCL and – after announced changes in the shareholder structure of SYTCL – could be clarified by means of a Legal Opinion by the Chinese Law Firm Jingtian &amp; Gongcheng dated 27 May 2016 as well as an updated excerpt from the public register of the Shanghai Jing'an Market Supervision and Administration Bureau.</p>
Adverse press/media comment		SYTCL has a low public profile. No adverse information was identified in relation to SYTCL through research of available online sources.
Litigation		No litigation filings were identified in relation to SYTCL through research of available online litigation records.
Sanctions and high-risk entities lists		No references to SYTCL were identified in published lists of entities subject to international economic sanctions or in other available lists of high risk entities
Director information		<p>According to the BCISS – SAIC, _____ is the legal representative, executive director and manager of SYTCL.</p> <p>According to the Due Diligence Questionnaire from 2 March 2016, _____ the Chairman, _____ is the President and _____ is the Executive Director.</p> <p>No adverse information or litigation filings were identified. However, _____ career details or personal background details could not be established from online sources.</p>



## Summary of findings

## Risk indicators: Shanghai Yiqian Trading Co., Limited

Area	Indicator	Details
		<p>No adverse issues identified.</p> <p>Note: _____ is a common name in China, and research of online sources identified a number of references to individuals by this name. Based on the corporate affiliations provided by SYTCL, the individual profiled in this report, does not have a discernible public profile.</p>

Key findings	Source	Date
<b>Background details</b>		
Incorporated: 14 November 2013	BCISS – SAIC	01-Mar-16 (accessed)
According to the Due Diligence Questionnaire from 2 March 2016 the date of incorporation was 21 January 2008.	Shanghai AIC	01-Mar-16 (accessed)
	Questionnaire filled out by SYTCL	02-Mar-16 (source date)
Registration number: 310108000554889 Organization Code: 08208453-4 Tax Identification Number: 310108082084534 Customs Registration number: 3108966036	BCISS – SAIC	01-Mar-16 (accessed)
	NACAO	01-Mar-16 (accessed)
The Organization Code is the sole and unchanged legal code for an organization in the People's Republic of China.	Shanghai Municipal Office, SAT	01-Mar-16 (accessed)
The State Council of China has set up a new Unified Social Credit Code system. From 1 October 1 2015, the three certificates (business license, organizational code certificate and tax certificate) of companies in China have been consolidated into one license with one social credit code.	General Administration of Customs	01-Mar-16 (accessed)
	<a href="#">China State Council – Unified Social Credit Code</a>	17-Jun-15 (source date)
Status: Active	BCISS – SAIC	01-Mar-16 (accessed)
	Shanghai AIC	01-Mar-16 (accessed)
Regulator: Unknown		
Ownership type: Limited Liability Company	BCISS – SAIC	01-Mar-16 (accessed)
	Shanghai AIC	01-Mar-16 (accessed)
Exchange: Not listed		
Activities: SYTCL sells construction materials, textiles, office supplies, electronic products, electrical and mechanical equipment, and general merchandise.	BCISS – SAIC	01-Mar-16 (accessed)
	<a href="#">Souqi.com</a> (business directory)	01-Mar-16 (accessed)
According to the Due Diligence Questionnaire the activities are the following:	Questionnaire filled out by SYTCL	02-Mar-16 (source date)
Air, Marine, Land Logistics and International Trading		



## Background details

Address information		
Registered address: Room No. 1716, No. 138, Pingxingguan Road, Zhabei District, Shanghai, China (上海市闸北区平型关路138号1716室)	BCISS – SAIC	01-Mar-16 (accessed)
Business address: Room No. 1716, No. 138, Pingxingguan Road, Zhabei District, Shanghai, China	Shanghai Municipal Office, SAT	01-Mar-16 (accessed)
	<a href="http://Souqi.com">Souqi.com</a> (business directory)	01-Mar-16 (accessed)
Internet address: Not available		
Credit rating information		
SYTCL has obtained a "B" rating from the General Administration of Customs of China ("China Customs"). SYTCL's registration with China Customs is valid until 13 November 2033.	General Administration of Customs	01-Mar-16 (accessed)
As per legal compliance, credibility and business manageability, China Customs classifies enterprises into five ratings of AA, A, B, C, and D for differentiated evaluation and supervision. Under the principle of "compliance for facilitation", the General Administration of Customs treats enterprises of different categories with different levels of clearance or control. Enterprises of Class AA and Class A is entitled to higher clearance, while Class B is subject to regular measures, and Classes C and D to stricter control.	China Customs - Measures on Classified Management of Enterprises	11-Dec-08 (source date)
Financials		
According to the BCISS – SAIC, SYTCL has a registered capital of CNY 500,000 (EUR 69,810). No further details of the company's financial position could be identified through research of available online sources.	BCISS – SAIC	01-Mar-16 (accessed)
Enterprises in China are not required to disclose information concerning total assets, liabilities, owners' equity, gross operating income, net profits, net margins, and total tax payments.	<a href="#">The National law review</a>	03-Dec-14 (source date)
Conversion rate: CNY 1 = EUR 0.13962 (as at 10 March 2016, Source: Oanda)	<a href="#">Enterprise information Public Disclosure System</a>	Sep-2014 (source date)
Auditors: Unknown		

Shareholders			
Name	Shareholding (%)	Source	Date
[REDACTED]	[REDACTED]	BCISS – SAIC	01-Mar-16 (accessed)
[REDACTED]	[REDACTED]	BCISS – SAIC	01-Mar-16 (accessed)
<p>According to the due diligence questionnaire filled out by SYTCL, [REDACTED] holds a [REDACTED] percent share. However, this information could not be confirmed through research of other available online sources.</p> <p>[REDACTED] and [REDACTED] have been profiled as a part of this report.</p> <p>Research of online regulatory and law-enforcement watch lists was conducted to identify issues of potential concern in relation to [REDACTED] and [REDACTED] no adverse information was identified.</p>	[REDACTED]	Questionnaire filled out by SYTCL	02-Mar-16 (source date)



To improving understanding KPMG send questions to the German lawyers \_\_\_\_\_, Partnerschaft von Rechtsanwälten mbB, \_\_\_\_\_ – the contact of Shanghai Yiqian Trading Co., Limited in Germany - on 19 January 2016. KPMG got an answer on 25 February 2016 as follows:

**Question:** According to the questionnaire, the buyer is Shanghai Yiqian Trading Co., Ltd (previously known as Best Resources Incorporation) with the identification number 310225000589540. The provided register excerpt and documents that the company presents on its Website (see: <http://www.bst-resources.com/aboutus.asp?tid=3>, Image 5 of 8) suggest that the company still operates under Best Resources Incorporation. Is there any official documentation for the change of name into Shangai Yiqian Trading Co., Ltd?

**Answer:** We understand that there are two "Shanghai Yiqian Trading Co., Ltd" entities, one is 100% owned by Best Resources (which is \_\_\_\_\_ owned by \_\_\_\_\_ and the other Shanghai Yiqian Trading Co., Ltd entity is \_\_\_\_\_% owned by Mr. \_\_\_\_\_ and has the identification number \_\_\_\_\_. The latter is the bidding company.

**Question:** Furthermore, documents for a company with the identification number 310108000554889 was sent by the buyer. We believe this refers to a company with the name Shanghai Yiqian Trading Co., Ltd. How is this company related to the one with the identification number \_\_\_\_\_?

**Answer:** Please refer to our comment to the previous bullet.

**Question:** According to the Shanghai State Administration for Industry and Commerce (SAIC) \_\_\_\_\_ is the sole shareholder of the company with the identification number 310225000589540 (上海沛原实业有限公司). Is there any official documentation for the shareholding structure described in the Company Due Diligence Questionnaire? According to the Company Due Diligence Questionnaire, there are 9 shareholders and \_\_\_\_\_ only holds \_\_\_\_\_.

**Answer:** \_\_\_\_\_ is the sole shareholder of the bidding company, Shanghai Yiqian Trading Co., Ltd with the company ID number 310108000554889. The shareholder structure described in the Company Due Diligence Questionnaire is the intended shareholder structure to be implemented following closing. We apologize for the confusion.

**Question:** According to SAIC, \_\_\_\_\_ is the only registered representative (Supervisor) of the company in addition to \_\_\_\_\_ is there any official documentation for the position c \_\_\_\_\_ Executive Director as stated in the questionnaire?

**Answer:** It is correct that \_\_\_\_\_ and Mr. \_\_\_\_\_ are the sole legal representatives of the bidding company. Please refer to our comment to the previous bullet.

**Question:** In a publicly accessible online source, we found an individual : \_\_\_\_\_ acting as Legal Representative and General Manager of the company (see <http://peiyuansh.en.forbuyers.com/about>). Is this information still valid?

**Answer:** No, \_\_\_\_\_ and Mr. \_\_\_\_\_ are the sole legal representatives of the bidding company.

Key Individuals			
Name	Position	Source	Date
[REDACTED]	Legal representative, executive director and manager	BCISS – SAIC	01-Mar-16 (accessed)
[REDACTED]	Supervisor	BCISS – SAIC	01-Mar-16 (accessed)
<p>According to the Due Diligence Questionnaire the key individuals are:</p> <ul style="list-style-type: none"> <li>- [REDACTED] (Chairman)</li> <li>- [REDACTED] (President)</li> <li>- [REDACTED] (Executive Director)</li> </ul>		Questionnaire filled out by SYTCL	02-Mar-16 (source date)



Adverse press and media			
Key findings	Source	Report date	Source reliability
SYTCL has a low public profile. References in online sources primarily relate to its business activities. No adverse information was identified in relation to SYTCL through research of available online sources.			

Research was conducted of both English and Chinese-language media sources.

China litigation

Chinese court records (both civil and criminal) are not widely available online.

Description	Source	Date	Case reference
<p>No litigation filings were identified in relation to SYTCL through research of available online Chinese litigation records.</p> <p>Chinese court records are not comprehensive. Chinese courts normally only disclose limited information concerning high profile cases and/or cases that are of major public interest.</p>	National and Supreme Courts Search of Persons Subject to Enforcement	01-Mar-16 (accessed)	
	Chinese Legal Judgment Aggregator website	01-Mar-16 (accessed)	
	China Judgments Online	01-Mar-16 (accessed)	



#### Sanctions lists

Shanghai Yiqian Trading Co., Limited has been checked against a range of sanctions lists, including those published by the US OFAC, the EU and HM Treasury.

Match list	Match degree	Match item	Match date	Source
No matches were found.				

#### High risk entities lists

Shanghai Yiqian Trading Co., Limited has been checked against a wide range of sources carrying information on potentially high risk entities.

Match list	Match degree	Match item	Match date	Source
No matches were found.				

20 April 2016

## Key directors

Key findings	Source	Date
<b>Personal details</b>		
Date of Birth: Nationality: Education:	BCISS – SAIC	29-Feb-16 (accessed)
<b>Career development</b>		
career details could not be identified through research of available online sources.	BCISS – SAIC	29-Feb-16 (accessed)
Present – Legal representative, executive director and manager of Shanghai Yiqian Trading Co., Limited	BCISS-SAIC – BRI	29-Feb-16 (accessed)
Present – Supervisor of Incorporation	<a href="#">BRI website – Contact</a>	01-Mar-16 (accessed)
<b>Corporate interests</b>		
<b>China</b> ■ Shanghai Yiqian Trading Co., Limited – Legal representative, executive director, manager and shareholder (percent)	BCISS – SAIC	29-Feb-16 (accessed)
<b>Adverse press</b>		
has a low public profile. No adverse press was identified through research of available online sources.		
<b>Litigation</b>		
No litigation filings were identified in relation to	National and Supreme Courts Search of Persons Subject to Enforcement	01-Mar-16 (accessed)
	<a href="#">Chinese Legal Judgment Aggregator website</a>	01-Mar-16 (accessed)
	China Judgement online	01-Mar-16 (accessed)



## Key directors

## Politically exposed persons

[REDACTED] has been checked against a wide range of sources carrying information on Politically Exposed Persons.

Match list	Match degree	Match item	Match date	Source
No matches were found.				

## Sanctions lists

[REDACTED] has been checked against a range of sanctions lists including those published by the US OFAC, the EU and HM Treasury.

Match list	Match degree	Match item	Match date	Source
No matches were found.				

## High risk individuals lists

[REDACTED] has been checked against a wide range of sources carrying information on potentially high risk individuals, such as disqualified directors and individuals subject to regulatory actions.

Match list	Match degree	Match item	Match date	Source
No matches were found.				

20 April 2016

## Key directors

Key findings	Source	Date
<b>Personal details</b>		
Date of Birth: [REDACTED] Nationality: [REDACTED] Education: [REDACTED]		
<b>Career development</b>		
[REDACTED]'s career details could not be established through research of available online sources.		
<b>Corporate interests</b>		
<b>China</b> ■ Shanghai Yiqian Trading Co., Limited – Shareholde [REDACTED]	BCISS – SAIC	02-Mar-16 (accessed)
<b>Adverse press</b>		
[REDACTED] has a low public profile. No adverse information was identified through research of available online sources.		
<b>Litigation</b>		
No litigation filings were identified in relation to [REDACTED]	National and Supreme Courts Search of Persons Subject to Enforcement  <a href="#">Chinese Legal Judgment Aggregator website</a>	01-Mar-16 (accessed)   01-Mar-16 (accessed)



## Key directors

## Politically exposed persons

[REDACTED] has been checked against a wide range of sources carrying information on Politically Exposed Persons.

Match list	Match degree	Match item	Match date	Source
No matches were found.				

## Sanctions lists

[REDACTED] has been checked against a range of sanctions lists including those published by the US OFAC, the EU and HM Treasury.

Match list	Match degree	Match item	Match date	Source
No matches were found.				

## High risk individuals lists

[REDACTED] has been checked against a wide range of sources carrying information on potentially high risk individuals, such as disqualified directors and individuals subject to regulatory actions.

Match list	Match degree	Match item	Match date	Source
No matches were found.				

20 April 2016

## Key directors

Key findings	Source	Date
<b>Personal details</b>		
<p>Date of Birth: _____</p> <p>Nationality: _____</p> <p>Education: _____</p> <p>_____ date of birth and passport number were provided by SYTCL, and could not be confirmed through research of available online sources.</p>	<p>BCISS-SAIC – BRI</p> <p>Questionnaire filled out by SYTCL</p>	<p>29-Feb-16 (accessed)</p> <p>06-Nov-15 (source date)</p>
<b>Career development</b>		
<p>_____ career details could not be identified through research of available online sources.</p> <p>Present – Executive director, legal representative and general manager of _____ Incorporation</p> <p>Present – Director of _____ (Hong Kong) Co., Limited</p> <p>Present – Director of _____ Association Limited</p> <p>Present – Director of _____ Technology Co., Limited</p> <p>Present – Director of _____ Industry Co., Limited</p> <p>Present – Director of _____ Trading Co., Limited</p> <p>Present – Director of _____ Industrial Co., Limited</p> <p>Present – Director of _____ Co., Limited</p> <p>Present – Director of _____ Co., Limited</p> <p>Present – Director of _____ Limited</p>	<p>BCISS-SAIC – BRI</p> <p><a href="http://Zhiqiye.com">Zhiqiye.com</a></p> <p><a href="http://bst-resources.com">bst-resources.com</a></p> <p><a href="#">website – Contact us</a></p> <p>Hong Kong Corporate Registry – Directorships</p>	<p>29-Feb-16 (accessed)</p> <p>29-Feb-16 (accessed)</p> <p>01-Mar-16 (accessed)</p> <p>01-Mar-16 (accessed)</p>



## Key directors

## Corporate interests

## China

- [REDACTED] Executive director, legal representative, general manager and shareholder, (percent)
- Shanghai Yiqian Trading Co., Limited – Shareholder (percent)\*

## Hong Kong

- [REDACTED] Co., Limited – Director
- [REDACTED] Association Limited – Director
- [REDACTED] Co., Limited – Director
- [REDACTED] Co., Limited – Director
- [REDACTED] Co., Limited – Director
- [REDACTED] Industrial Co., Limited – Director
- [REDACTED] Co., Limited – Director
- [REDACTED] rector
- [REDACTED] Limited – Director

\*The above-mentioned information was provided by SYTCL, and could not be confirmed through research of available online sources.

BCISS-SAIC – BRI

29-Feb-16  
(accessed)[Zhiqiye.com](http://Zhiqiye.com)29-Feb-16  
(accessed)

Questionnaire filled out by SYTCL

06-Nov-15  
(source date)bst-resources.com  
[BRI website – Contact us](#)01-Mar-16  
(accessed)Hong Kong  
Corporate Registry  
– Directorships01-Mar-16  
(accessed)

## Adverse press

[REDACTED] has a low public profile. No adverse information was identified through research of available online sources.

## Litigation

Research of the National and Supreme Courts Search of Persons Subject to Enforcement website identified over 40 references to individuals named [REDACTED] who were cited as debtors in lawsuits filed in China. However, due to the lack of further qualifying information and prevalence of the name, it could not be confirmed if any of these individuals is the same as the individual identified in this report.

National and  
Supreme Courts  
Search of Persons  
Subject to  
Enforcement29-Feb-16  
(accessed)

Research of the Chinese Legal Judgment Aggregator website identified eighteen references to individuals named [REDACTED] who were cited as plaintiff, defendant or as a third party in several lawsuits filed in China. However, due to the lack of further qualifying information and prevalence of the name, it could not be confirmed if any of these individuals is the same as the individual identified in this report.

[Chinese Legal Judgment Aggregator website](#)29-Feb-16  
(accessed)

No litigation filings were identified in relation to [REDACTED] through research of the China Judgement Online website.

China Judgement online

29-Feb-16  
(accessed)

No litigation filings were identified.

Hong Kong Legal  
Judiciary  
Hong Kong Legal  
Information  
Institute01-Mar-16  
(accessed)  
01-Mar-16  
(accessed)

Research was also conducted on the following name variation: Kan Wang.

**Key directors**

**Politically exposed persons**

[REDACTED] has been checked against a wide range of sources carrying information on Politically Exposed Persons.

Match list	Match degree	Match item	Match date	Source
No matches were found.				

**Sanctions lists**

[REDACTED] has been checked against a range of sanctions lists including those published by the US OFAC, the EU and HM Treasury.

Match list	Match degree	Match item	Match date	Source
No matches were found.				

**High risk individuals lists**

[REDACTED] has been checked against a wide range of sources carrying information on potentially high risk individuals, such as disqualified directors and individuals subject to regulatory actions.

Match list	Match degree	Match item	Match date	Source
No matches were found.				



20 April 2016

## Key directors

Key findings	Source	Date
<b>Personal details</b>		
Date of Birth: [REDACTED] Nationality: [REDACTED] Education: [REDACTED]		
<b>Career development</b>		
[REDACTED] career details could not be identified through research of available online sources.		
Present – Executive director of [REDACTED], Incorporation	Questionnaire filled out by SYTCL	06-Nov-15 (source date)
<b>Corporate interests</b>		
<b>China</b> [REDACTED] Incorporation – Executive director * [REDACTED] Shanghai Yiqian Trading Co., Limited – Shareholder [REDACTED]	Questionnaire filled out by SYTCL	06-Nov-15 (source date)
*The above-mentioned information was provided by SYTCL, and could not be confirmed through research of available online sources.		
<b>Adverse press</b>		
[REDACTED] does not have a discernible public profile.		
<b>Litigation</b>		
No litigation filings were identified in relation to [REDACTED] through research of online Chinese court records.	<a href="#">Chinese Legal Judgment Aggregator website</a>	02-Mar-16 (accessed)
	National and Supreme Courts Search of Persons Subject to Enforcement	02-Mar-16 (accessed)
	China Judgements online	02-Mar-16 (accessed)

Research was also conducted on the following name variations: [REDACTED]

20 April 2016

**Key directors**

**Politically exposed persons**

[REDACTED] has been checked against a wide range of sources carrying information on Politically Exposed Persons.

Match list	Match degree	Match item	Match date	Source
No matches were found.				

**Sanctions lists**

[REDACTED] has been checked against a range of sanctions lists including those published by the US OFAC, the EU and HM Treasury.

Match list	Match degree	Match item	Match date	Source
No matches were found.				

**High risk individuals lists**

[REDACTED] has been checked against a wide range of sources carrying information on potentially high risk individuals, such as disqualified directors and individuals subject to regulatory actions.

Match list	Match degree	Match item	Match date	Source
No matches were found.				



20 April 2016

According to SYCTL the [REDACTED] shareholder

Key findings	Source	Date
<b>Personal details</b>		
<p>Date of Birth: [REDACTED]  Nationality: [REDACTED]  Personal Identification number [REDACTED]  Education: [REDACTED]  [REDACTED], Hang Yan District, Taizhou City, Zhejiang Province, China [REDACTED]</p> <p>The address information was provided by SYCTL and could not be confirmed through research of available online sources. A reverse address check on the address provided by SYCTL did not identify any individual or entity to be based at this address.</p>		
<b>Career development</b>		
<p>[REDACTED] early career details could not be identified through research of available online sources.</p> <p>Partner (2012-Present) - [REDACTED] and Financial Management, Zhejiang</p> <p>Research of available online sources did not identify [REDACTED] association with [REDACTED] and Financial Management</p> <p>According to SYCTL, the company is owned and funded by [REDACTED] family. However, this information could not be confirmed through research of online sources.</p> <p>Based on the research conducted with the English name, [REDACTED] and Financial Management does not have discernible public profile.</p> <p>Due to the lack of further identifying information we could not confirm [REDACTED] and Financial Management's Chinese name (Chinese characters)</p> <p>Research was only conducted in the English language.</p>	Curriculum Vitae – provided by SYCTL	20-Apr-16 (accessed)
<p>Partner (Since 2005) - [REDACTED] Manufacturers, Zhejiang</p> <p>Research of online sources did not identify [REDACTED] association with [REDACTED] Manufacturers.</p> <p>Based on the research conducted with the English name, [REDACTED] Manufacturers does not have discernible public profile.</p> <p>Due to the lack of further identifying information we could not confirm [REDACTED] Manufacturers' Chinese name (Chinese characters) Research was only conducted in the English language.</p>	Curriculum Vitae – provided by SYCTL	20-Apr-16 (accessed)
<p>Research of online credit reports identified one or more references to individuals named [REDACTED] be associated with companies such as: [REDACTED] Co., Limited, based in Zhejiang province as the General Manager; [REDACTED] Co., Limited, based in Jinan province as the Deputy Manager and [REDACTED] Co., Limited, based in Jiangsu province as an Executive. However, due to lack of further qualifying information and prevalence of the name, it could not be confirmed if those individuals are the same as the individual identified in our report.</p>	<p>D&amp;B credit report</p> <p>D&amp;B credit report</p> <p>D&amp;B credit report</p>	<p>08-Mar-16 (source date)</p> <p>14-Jan-15 (source date)</p> <p>09-Oct-14 (source date)</p>

20 April 2016

According to SYCTL the [redacted] shareholder

#### Corporate interests

##### China

According to SYCTL, [redacted] will be the new majority shareholder of Shanghai Yiqian Trading Co. Ltd. (上海裔谦贸易有限公司). However, his association with SYCTL and information regarding his ownership in the company could not be confirmed from the research of available online sources.

SYCTL was incorporated in November 2013 in Shanghai, China. SYCTL is engaged in the sale of construction materials, textiles, general merchandise and office supplies, various electronic products, electrical and mechanical equipment.

According to the BCISS – SAIC, [redacted] and [redacted] are the current shareholders of the company holding [redacted] percent shares each.

Information provided by SYCTL

BCISS-SAIC (Shanghai Yiqian)

20-Apr-16 (accessed)

#### Adverse press

No adverse issues identified

Note: [redacted] is a common name in China, and research of online sources identified a number of references to individuals by this name. Based on the corporate affiliations provided by SYCTL, the individual profiled in this report, does not have a discernible public profile.

#### Litigation

[redacted] is a common name in China.

Research of the Chinese legal judgment aggregator identified over two hundred references to individuals named [redacted] who were cited as a plaintiff, a defendant or as a third party in lawsuits filed in China. These lawsuits were mainly in relation to labour contract, money lending disputes, accidental dispute and sales contract disputes. However, due to the lack of further qualifying information and given the prevalence of the name, [redacted] it could not be confirmed if any of those individuals are the same as the individual identified in this report.

Research of the China Judgement Online identified over six thousand references to individuals named [redacted] who were cited as a plaintiff, a defendant or as a third party in lawsuits filed in China. These lawsuits were mainly in relation to labour contract dispute, money lending disputes, accidental dispute and sales contract disputes. However, due to the lack of further qualifying information and given the prevalence of the name, [redacted] it could not be confirmed if any of those individuals are the same as the individual identified in this report.

Chinese legal judgment aggregator

China Judgements online

20-Apr-16 (accessed)

20-Apr-16 (accessed)



20 April 2016

According to the client the [REDACTED] shareholder

#### Politically exposed persons

[REDACTED] has been checked against a wide range of sources carrying information on Politically Exposed Persons.

Match list	Match degree	Match item	Match date	Source
No matches were found.				

#### Sanctions lists

[REDACTED] has been checked against a range of sanctions lists including those published by the US OFAC, the EU and HM Treasury.

Match list	Match degree	Match item	Match date	Source
No matches were found.				

#### High risk individuals lists

[REDACTED] has been checked against a wide range of sources carrying information on potentially high risk individuals, such as disqualified directors and individuals subject to regulatory actions.

Match list	Match degree	Match item	Match date	Source
No matches were found.				



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## Part II

# Shanghai Guoqing Investment Co. Limited (上海国清投资有限公司) including [REDACTED]

Know Your Third Party






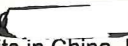





30 May 2016



# Shanghai Guoqing Investment Co. Limited 30 May 2016

## Summary of findings

Subjects	
Company legal name	Shanghai Guoqing Investment Co. Ltd (上海国清投资有限公司) ("SGIC") According to SYTCL, "上海国清投资股份有限公司" is the Chinese name of the company. However, research of the Shanghai Administration for Industry and Commerce registry ("SAIC") identified the Chinese name of the company as "上海国清投资有限公司".
Other names (Trading names, previous names)	None identified.
Key individuals	

Risk summary		
Area	Details	
Background details		No risk identified.
Adverse press and media		No risk identified.
Litigation and enforcement orders		No risk identified.
Sanctions and other high risk registers		No risk identified.
Key individuals		<p>Risk identified.</p> <p>Research identified references to individuals named  and  who were subject to legal enforcement actions and lawsuits in China. However,  and  are common names in China. Therefore, due to a lack of further identifying information, it could not be confirmed whether any of those individuals are the same as the individuals identified in this report. We suggest to contact  and  directly in order to clarify whether any of both individuals are the same as one or the individuals identified in legal enforcement actions and lawsuits.</p>

# Shanghai Guoqing Investment Co. Limited 30 May 2016

## Background

### Background

#### Background details

Company number	<p>Unified Social Credit Code: 91310115MA1H74H87F*</p> <p>Tax registration number: 91310115MA1H74H87F</p> <p>Organisation Code: MA1H74H87**</p> <p>*The State Council of China has set up a new Unified social credit code system in China. From October 1, 2015, the three certificates (business license, organizational code certificate and tax certificate) of the company in China have been consolidated into one license with one unified social credit code.</p> <p>**Organisation Code of the People's Republic of China is the sole and unchanged legal code mark for an organization in the territory of the People's Republic of China.</p>
Date of incorporation	11 November 2015
Status	Active
Legal form	Limited Liability Company
Regulator	None identified.
Exchange	Unlisted
Nature of business	SGIC operates as an investment management and asset management company in China.
Registered office address	Room no 021, H Block, No 319, Minlei Road, New Pudong district, Shanghai Municipality, China (上海市浦东新区民雷路 319 号 H 座 021 室)
Principal place of business	Shanghai, China
Internet address	n/a
Financial	<p>Unknown</p> <p>SGIC's current financial position could not be determined through research of available online sources. According to the Business Credit Information Search System of Enterprises in China ("BCISS"), a website maintained by the State Administration for Industry and Commerce ("SAIC"), that provides corporate information (BCISS-SAIC), SGIC has a registered capital of CNY 667 million (USD 79.8 million).*</p> <p>Enterprises in China may report, but are not required to disclose, information concerning total assets, total liabilities, total owners' equity, gross operating income, total net profits, net margins and total tax payments.</p> <p>*Exchange rate: 1 USD = 6.549 CNY as of May 24, 2016 (Source: <a href="#">OANDA</a>)</p>
Auditors	None identified

The above-noted basic background information of the company has been confirmed from the research of the Shanghai AIC, the BCISS-SAIC registry, Shanghai Municipal Office State Administration of Tax website and the National Administration for Code Allocation to Organizations ("NACAO") website.



# Shanghai Guoqing Investment Co. Limited 30 May 2016

## Adverse press and media

Adverse press and media			
Category		Source	Date
Sanctions	No adverse information identified.		
Bribery and corruption	No adverse information identified.		
Money laundering	No adverse information identified.		
Fraud	No adverse information identified.		
Abuse of public office	No adverse information identified.		
Regulatory violations	No adverse information identified.		
Litigation	No adverse information identified.		
Performance and track record	No adverse information identified.		
Social and environmental issues	No adverse information identified.		
Other	No adverse information identified.		
	No adverse information identified.		
	No adverse information identified.		

\*Research was also conducted on the Chinese name provided by SYTCL: 上海国清投资股份有限公司.

# Shanghai Guoqing Investment Co. Limited 30 May 2016

## Litigation

Litigation			
Category		Source	Date
Criminal convictions and investigations	No information identified.		
Civil judgments of the higher courts	<p>No litigation filings were identified in relation to SGIC through research of available online Chinese litigation records.</p> <p>Chinese court records are not generally available online. Chinese courts normally only disclose limited information concerning high profile cases and/or cases that are of major public interest.</p>	National and Supreme Courts Search of Persons Subject to Enforcement	24-May-16 (accessed)
		Chinese Legal Judgment Aggregator website	24-May-16 (accessed)
		China Judgement Online (Court judgment documents database set up by the China's Supreme People's Court)	24-May-16 (accessed)






Sanctions and other high risk registers			
Category		Source	Date
International economic sanctions lists	No information identified.		
Law enforcement wanted lists	No information identified.		
Corporate status events	No information identified.		
Other high risk entities lists	No information identified.		

## Key directors

Key findings	
Subject details	
<b>Name:</b>	[REDACTED]
<b>Position</b>	<p>Legal Representative, Executive Director and Shareholder [REDACTED] percent)</p> <p>According to SYTCL, [REDACTED] is the sole owner of the company. However, according to the BCISS-SAIC, [REDACTED] holds [REDACTED] percent shares and [REDACTED] holds the remaining [REDACTED] percent share of SGIC.</p>
<b>Date of birth</b>	<p>[REDACTED]</p> <p>The above-mentioned information is provided by SYTCL and could not be confirmed through research of available online sources.</p>
<b>Nationality</b>	<p>[REDACTED]</p> <p>The above-mentioned information has been confirmed from the research of the BCISS-SAIC.</p>
<b>Personal Identification number</b>	<p>[REDACTED]</p> <p>The People's Republic of China requires every citizen over the age of 16 to carry an identity card. The ID card is the only acceptable legal document to obtain a resident permit, driver's license or passport, to gain employment or open bank accounts, or to apply to tertiary education and technical colleges.</p> <p>The above-mentioned identification number is provided by SYTCL and could not be confirmed through research of available online sources.</p>
<b>Address</b>	<p>[REDACTED] Pudong, Shanghai 200120, Republic of China</p> <p>The above-mentioned information is provided by SYTCL and could not be confirmed through research of available online sources. A reverse address check on the address provided by SYTCL could not confirm the presence of Guoliang Zhu at the address.</p> <p>According to the personal identification number provided by SYTCL, [REDACTED] was born in [REDACTED]</p>
<b>Passport number:</b>	<p>[REDACTED]</p> <p>The above-mentioned information is provided by SYTCL and could not be confirmed through research of available online sources.</p>
<b>Overall rating</b>	No risk identified.



Risk summary		
<b>Adverse press and media</b>		No adverse information identified.
<b>Litigation</b>		Research identified references to individuals named _____ who were subject to legal enforcement actions and lawsuits in China. However, _____ is a common name in China. Therefore, due to a lack of further identifying information, it could not be confirmed whether any of those individuals are the same as the individual identified in this report. We suggest to contact _____ directly in order to clarify whether he is the same as one of the individuals identified in legal enforcement actions and lawsuits.
<b>Sanctions and other high risk registers</b>		No adverse information identified.

## Key directors

Adverse press and media			
Category		Source	Date
Sanctions	No adverse information identified.		
Bribery and corruption	No adverse information identified.		
Money laundering	No adverse information identified.		
Fraud	No adverse information identified.		
Abuse of public office	No adverse information identified.		
Regulatory violations	No adverse information identified.		
Litigation	Research identified references to individuals named _____ who were subject to legal enforcement actions and lawsuits in China. However, due to a lack of further identifying information, it could not be confirmed whether any of those individuals are the same as the individual identified in this report.		
Performance and track record	No adverse information identified.		
Social and environmental issues	No adverse information identified.		
Other	No adverse information identified.		



Litigation			
Category		Source	Date
Criminal convictions and investigations	No adverse information identified.		
Civil judgments of the higher courts	No litigation filings were identified in relation to [REDACTED] through research of the website of the National and Supreme Courts Search of Persons Subject to Enforcement.	National and Supreme Courts Search of Persons Subject to Enforcement	24-May-16 (accessed)
	Research of the China Judgments Online website identified over four hundred references to individuals named [REDACTED] as plaintiff, defendant or third party in several lawsuits filed in China. However, due to the lack of further qualifying information and the prevalence of the name, it could not be confirmed if any of those individuals are the same as the one identified in this report.	China Judgments Online website	24-May-16 (accessed)
	<p>Research of the Chinese Legal Judgement Aggregator website identified an individual named [REDACTED] who was cited as defendant in a private lending dispute case filed by an individual [REDACTED] in Erqi District People's Court of Henan province in China.</p> <p>According to the lawsuit, [REDACTED] gave CNY 500,000 (USD 73,206) to [REDACTED] in 2008 but the latter failed to return the money. Hence, [REDACTED] filed the case and was seeking to recover the money along with interest. However, due to lack of legal and factual basis, the court dismissed the case. The case is now closed.</p> <p>Due to a lack of further qualifying information and the prevalence of the name, it could not be confirmed whether this individual is the same as the one identified in this report.</p>	Chinese Legal Judgement Aggregator website	25-Oct-09 (source date)




## Key directors

	<p>Research of the Chinese Legal Judgment Aggregator website identified an individual named [REDACTED] who was cited as a plaintiff in a contract dispute case filed against Beijing Jinyuan Senkai Project Management Centre, (BJSPM) in the Haidian District People's court of Beijing in China in 2009.</p> <p>According to the information provided in the lawsuit, in 2008, both the parties went under a building materials supplying contract. However, BJSPM failed to pay the amount agreed. Hence, [REDACTED] filed the case seeking the contractual amount of CNY 176,503 (USD 25,792) along with late fee charges of CNY 146,484 (USD 21,406). The court ruled in favor of [REDACTED] and ordered BJSPM to pay CNY 176,468 (USD 25,787) along with CNY 50,000 (USD 7,306) as a fine penalty and dismissed the other claims raised by [REDACTED]. The case is now closed.</p> <p>Due to a lack of further qualifying information and the prevalence of the name, it could not be confirmed whether this individual is the same as the one identified in this report.</p>	Chinese Legal Judgment Aggregator website	05-Jun-09 (source date)
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## Sanctions and other high risk registers

Category	Source	Date
International economic sanctions lists	No adverse information identified.	
Law enforcement wanted lists	No adverse information identified.	
Other high risk individuals lists	No adverse information identified.	



Key findings		
Subject details		
Name:		
Position	<p>Supervisor and Shareholder ( )</p> <p>The above-mentioned information has been confirmed from the research of the BCISS-SAIC registry.</p> <p>According to the BCISS-SAIC, ( ) is also a shareholder of Shanghai Yiqian Trading Co., Limited (上海裔谦贸易有限公司). However, his exact stake in the company could not be confirmed through research of available online sources.</p>	
Date of birth	<p>The above-mentioned information is provided by SYTCL and could not be confirmed through research of available online sources.</p>	
Nationality	<p>The above-mentioned information has been confirmed from the research of the BCISS-SAIC registry.</p>	
Personal Identification number	<p>The People's Republic of China requires every citizen over the age of 16 to carry an identity card. The ID card is the only acceptable legal document to obtain a resident permit, driver's license or passport, to gain employment or open bank accounts, or to apply to tertiary education and technical colleges.</p> <p>The above-mentioned identification number is provided by SYTCL and could not be confirmed through research of available online sources.</p>	
Address	<p>According to the personal identification number provided by SYTCL, ( ) was born in Shanghai.</p>	
Passport number	<p>The above-mentioned information is provided by SYTCL and could not be confirmed through research of available online sources.</p>	
Overall rating	No risk identified	
Risk summary		
Adverse press and media		No adverse information identified.
Litigation		<p>Research identified references to individuals named ( ) who were subject to legal enforcement actions and lawsuits in China. However, ( ) is a common name in China. Therefore, due to a lack of further identifying information, it could not be confirmed whether any of those individuals are the same as the individual identified in this report. We suggest to contact ( ) directly in order to clarify whether he is the same as one of the individuals identified in legal enforcement actions and lawsuits.</p>
Sanctions and other high risk registers		No adverse information identified.

Adverse press and media			
Category		Source	Date
Sanctions	No adverse information identified.		
Bribery and corruption	No adverse information identified.		
Money laundering	No adverse information identified.		
Fraud	No adverse information identified.		
Abuse of public office	No adverse information identified.		
Regulatory violations	No adverse information identified.		
Litigation	Research identified references to individuals named _____ who were subject to legal enforcement actions and lawsuits in China. However, due to a lack of further identifying information, it could not be confirmed whether any of those individuals are the same as the individual identified in this report.		
Performance and track record	No adverse information identified.		
Social and environmental issues	No adverse information identified.		
Other	No adverse information identified.		
Litigation			
Category		Source	Date
Criminal convictions and investigations	No adverse information identified.		
Civil judgments of the higher courts	No litigation filings were identified in relation to _____ through research of the website of the National and Supreme Courts Search of Persons Subject to Enforcement.	National and Supreme Courts Search of Persons Subject to Enforcement	24-May-16 (accessed)
	Research of the China Judgments Online website identified over three thousand references to individuals named _____ as a plaintiff, a defendant or as a third party in several lawsuits filed in China. However, due to the lack of further qualifying information and the prevalence of the name, it could not be confirmed if any of those individuals are the same as the one identified in this report.	China Judgments Online	24-May-16 (accessed)



	Research of the Chinese Legal Judgment Aggregator website identified over hundred references to individuals named [REDACTED] as a plaintiff, a defendant or as a third party in several lawsuits filed in different courts of China. However, due to the lack of further qualifying information and the prevalence of the name, it could not be confirmed if any of those individuals are the same as the one identified in this report.	Chinese Legal Judgment Aggregator website	24-May-16 (accessed)
Sanctions and other high risk registers			
Category		Source	Date
International economic sanctions lists	No adverse information identified.		
Law enforcement wanted lists	No adverse information identified.		
Other high risk individuals lists	No adverse information identified.		



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## Part III



Know Your Third Party

30 May 2016



Key findings	
Subject details	
Name	[REDACTED]
Date of birth	[REDACTED] The above-given date of birth is provided by SYTCL and it could not be confirmed independently through research of available online sources.
Address	[REDACTED] Shanghai, People's Republic of China. The above-given address is provided by SYTCL and it could not be confirmed independently through research of available online sources. A reverse address check of the above mentioned address did not establish relevant information in relation to the individual.
Overall rating	No issues identified.
Risk summary	
Sanctions and other high risk registers	 No adverse issues identified.
Litigation and enforcement orders	 No adverse issues identified.
Corporate and business interests	 No adverse issues identified.
Adverse press and media	 No adverse issues identified.

**Sanctions and other high risk registers**

Category		Source	Date searched
International economic sanctions lists	No adverse information identified.	<ul style="list-style-type: none"> <li>■ Home Office</li> <li>■ EU</li> <li>■ UNSC</li> <li>■ OFAC – SDN List</li> <li>■ HM Treasury</li> </ul>	
Law enforcement wanted lists	No adverse information identified.		
Other high risk individuals lists	No adverse information identified.		

**Litigation, investigations and enforcement orders**

Category		Source	Date searched
Civil judgments of the higher courts	No adverse information identified.		
Criminal convictions and investigations	No adverse information identified.		
County court judgements	No adverse information identified.		
Regulatory enforcement actions	No adverse information identified.		
Professional/trade body disciplinary orders	No adverse information identified.		



Former corporate and business interests

Company name	Nature of interest	Source	Date searched
Tenure unknown (former corporate interest)	<p>Position</p> <p>Senior accountant at [REDACTED] (Group) Co., Ltd*.</p> <p>[REDACTED] is was incorporated in 2009 in Shanghai. It is engaged in shopping and chain department store business services.</p> <p>*The above-given information is provided by SYTCL and could not be confirmed independently through research of available online sources.</p>	<p>information provided by SYTCL – Curriculum Vitae</p> <p>BCISS-SAIC</p>	30-May-16 (accessed)

Research of regulatory and law enforcement watch-lists was conducted to identify issues of potential concern in relation to the above-mentioned corporate interests. No adverse issues were identified.

Adverse press and media (individual & current and former corporate interests identified)

Category	Source	Date/date searched
Sanctions	No adverse information identified.	
Bribery and corruption	No adverse information identified.	
Money laundering	No adverse information identified.	
Fraud	No adverse information identified.	
Abuse of public office	No adverse information identified.	
Regulatory violations	No adverse information identified.	
Litigation	No adverse information identified.	
Performance and track record	No adverse information identified.	
Social and environmental issues	No adverse information identified.	
Other	No adverse information identified.	

# Disclaimer and Final Remarks

## Disclaimer

With E-Mail dated 19 August 2015 and based on our Engagement Letter dated 29 January / 22 February 2013 Ministerium des Innern, für Sport und Infrastruktur Rheinland-Pfalz (today Ministerium des Innern und für Sport, subsequently "Client") appointed KPMG Rechtsanwaltsgesellschaft mbH to undertake limited research in relation to the background and integrity of Client's potential business partner Shanghai Yiqian Trading Co., Limited (上海裔谦贸易有限公司, subsequently "SYTCL") and its shareholders and legal representatives, subsequently referred to as "Know Your Counterparty" or "Know Your Third Party" Reports".

This report documents our findings. Our research was based on public records only. Research was limited to open sources, such as press releases and media databases, commercial and company registers, the Internet and other available sources in the public domain.

It should be noted that in the countries of interest the availability and reliability of such information differs. The information from the sources used cannot be verified and may be incorrect, insufficient or out of date. We exclude liability in this respect.

We cannot conclusively determine whether all information and evidence relevant to an assessment was identified and/or made available to us. Therefore, we cannot eliminate the possibility that our investigation would have produced different results had further information and documents been made available to us.

A legal assessment of the issues investigated is explicitly not part of our engagement. Any comments made in this report that refer to legal issues are to be understood as references to any subsequent legal action the client may wish to take. Such comments do not represent a legal opinion and we exclude liability in this respect. Our comments always refer to individual aspects; therefore, they cannot replace an extensive examination of all facts, including the relevant foreign legal fields, and are no substitute for such an examination.

This report is addressed exclusively to Ministerium des Innern und für Sport Rheinland-Pfalz. The results of our work must not be passed on to third parties. Only Ministerium des Innern und für Sport Rheinland-Pfalz can rely upon the facts or conclusions presented in this report. Therefore, the report is not intended to be used either by third parties or for any other purpose. Should third parties decide to rely upon this report, they do so at their own risk. KPMG Rechtsanwaltsgesellschaft mbH is not liable to any such third party.

Our engagement was carried out with the support of KPMG AG Wirtschaftsprüfungsgesellschaft and other member firms of the KPMG network based on the General Engagement Terms for Wirtschaftsprüfer and Wirtschaftsprüfungsgesellschaften [German Public Auditors and Public Audit firms] as of January 1, 2002 (cf. Appendix 1) as well as on additional written agreements. The release of this report to any third party requires our prior written approval. We or any other member firm of the KPMG network are not liable towards any third party.

## Final Remarks

We issue this report according to the best of our knowledge and belief, based on the documents and information made available to us, and with reference to our due diligence and the professional standards for German Public Auditors and Public Audit Firms.

Frankfurt, 30 May 2016

KPMG Rechtsanwaltsgesellschaft mbH



Dr. Carsten Jennert



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Dr. Armin Huhn

Appendix 1: General Engagement Terms for Wirtschaftsprüfer and Wirtschaftsprüfungsgesellschaften [German Public Auditors and Public Audit firms] as of January 1, 2002





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