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March 2, 2022

Sadekya Fiduciary Partners B.V.
Mr. R. Lucas
Abraham Mendez Chumaceiro Blvd 50
P.O. Box 4750
Curacao
rudsel.lucas@sadekya.com

Your ref.: -

Our ref.: MH/ac/2022-002149

Re: **Amendment of the exhibit “A” to the trust license of Sadekya
Fiduciary Partners B.V. (“Sadekya”)**

Dear Mr. Lucas:

We received your letters of February 7, 2022 requesting the Bank to place Dempel Directors B.V. (“Dempel Directors”) and Waaigat Directors B.V. (“Waaigat Directors”) on the exhibit “A” to the license of Sadekya. The supporting documents were in that respect submitted to the Bank, including your personal questionnaires to be subjected to the Bank’s integrity testing. In addition, we requested you in our e-mail of February 24, 2022 to elaborate on the paragraphs (i) and (j) in the excerpts from the Registry of the Chamber of Commerce and whether there will be activities involved that (could) fall under the scope of the *National Ordinance on the Supervision of Investment Institutions and Administrators* (“NOSIIA”) and/or the *National Ordinance on the Supervision of Banking and Credit Institutions* (“NOSBCI”). Subsequently, in your letter of February 25, 2022 you confirmed with the Bank that Dempel Directors and Waaigat Directors will not be used to deliver services and/or perform activities that (could) fall under the scope of the NOSIIA and NOSBCI.

We hereby inform you that the integrity testing performed on your person did not reveal that you have taken, in the Bank’s opinion, courses of action that may impede you to fulfill your function. We are therefore, in light of our *CBCS Policy Rule on Integrity Testing*, of the opinion that your integrity is beyond doubt. We refer you to the enclosed *Annex Integrity Testing*, which further outlines the integrity testing policy of the Bank.

Consequently, the Bank grants its approval for Dempel Directors and Waaigat Directors to provide trust services under the responsibility of Sadekya. Please find attached the amended exhibit “A”, which replaces the exhibit “A” that was sent to Sadekya enclosed with our letter of August 1, 2019.

Please note that according to article 17 of the *National Ordinance on the Supervision of Trust Service Providers*, trust service providers are obliged to annually submit their financial statements to the Bank. Therefore, Dempel Directors and Waaigat Directors are also

obliged to provide the Bank on an annual basis with its audited financial statements. It is also permitted to submit the audited consolidated financial statements of Sadekya that includes the financial figures of Dempel Directors and Waaigat Directors.

Sincerely,
Centrale Bank van Curaçao en Sint Maarten



A. Vossen
Deputy Director Supervision



J. Candelaria
Sector Manager Account Supervision

Enclosed: - Amended exhibit “A” to the trust license with number 0104TRUSTRP of Sadekya
 - Annex Integrity Testing

In accordance with the National Ordinance regulating Administrative Law (NG 2001, 79) objection or appeal against a decision of the Centrale Bank van Curaçao en Sint Maarten is possible within six weeks.

BIJLAGE “A”

Bijlage “A” ingevolge artikel 6 lid 1 van de *Landsverordening toezicht trustwezen* (P.B. 2003, nr. 114) (Ltt) bevattende de namen van de rechtspersonen die voor de toepassing van de Ltt onder de verantwoordelijkheid van Sadekya Fiduciary Partners B.V. beheersdiensten verlenen. Deze bijlage vormt een integraal onderdeel van de vergunning, nummer 0104TRUSTRP, verleend aan Sadekya Fiduciary Partners B.V.

De volgende rechtspersonen gevestigd op het navolgende adres worden door de Bank geacht beheersdiensten te verlenen onder de verantwoordelijkheid van Sadekya Fiduciary Partners B.V.:

Naam	Adres
1. Sadekya Trustees Ltd. N.V.	Abraham Mendez Chumaceiro Blvd. 50
2. RudLuc Directors N.V.	Abraham Mendez Chumaceiro Blvd. 50
3. Dempel Directors B.V.	Abraham Mendez Chumaceiro Blvd. 50
4. Waaigat Directors B.V.	Abraham Mendez Chumaceiro Blvd. 50

Willemstad, 2 maart 2022



ANNEX INTEGRITY TESTING

The Policy Rule on Integrity Testing by the Centrale Bank van Curaçao en Sint Maarten serves officially to warrant the integrity of that part of the financial sector that is subject to supervision or any dispensation arrangement of CBCS, by testing the persons involved.

In accordance with (Article 3 of) the Policy Rule on Integrity testing by the Centrale Bank van Curaçao en Sint Maarten (CBCS), the testing of the integrity of the persons involved takes place on a periodic basis. Normally, the CBCS hereby applies a term of 3 years. Retesting at an earlier stage is possible, for example when applying for a new position within the period of 3 years, for verification and/or in case of change of antecedents before termination of the stipulated period, and in case of a reported incident.

- The result of the integrity testing remains in principal valid for 3 years for all (co-) policy functions, as permitted herewith per person by the CBCS, starting with the first reported (co-) policy function.
- For the periodic testing every 3 years, local as well as international screening takes place. However, if the place of residence of the person involved has been solely Curaçao and Sint Maarten since the last screening, only local, not international screening takes place. An exception to the latter is made for every (co-) policymaker of a supervised institution by the CBCS that also is or has been (co-) policymaker of one or more foreign-based institutions.
- The CBCS grants permission for the person to discharging the respective position in case the integrity test does not disclose that the person involved gives evidence, or has given evidence, of such courses of action as a result of which his integrity is not (no longer) beyond doubt.
- The aforementioned does not exclude the possibility for the CBCS to withdraw its permission granted thereupon if, within the scope of continuing integrity testing, certain antecedents become evident.

CENTRALE BANK VAN CURAÇAO EN SINT MAARTEN