



AML POLICY

09.11.2022



Introduction

NexGen Asset Management ("NexGen") is committed to the highest standards of anti-money laundering (AML) compliance. This policy outlines our commitment to preventing money laundering and terrorist financing in accordance with the legal and regulatory requirements of the United States.

Purpose

The purpose of this AML policy is to establish a framework for detecting, preventing, and reporting suspicious activities that may involve money

laundering or terrorist financing. It is the responsibility of all employees, officers, and affiliates of NexGen to adhere to this policy.

Policy Statement

NexGen will not knowingly engage in or facilitate any money laundering or terrorist financing activities. We are dedicated to ensuring that our operations are free from such activities through rigorous adherence to AML laws and regulations.

Compliance Officer

NexGen has appointed a dedicated AML Compliance Officer who is responsible for overseeing the implementation and enforcement of this policy. The Compliance Officer will ensure that NexGen's AML program is effective and up-to-date with regulatory changes.

Know Your Customer (KYC)

NexGen will implement robust KYC procedures to verify the identity of our clients. This includes:

- Collecting and verifying identification documents (e.g., government-issued ID, passport).
- Assessing the purpose and nature of the business relationship.
- Conducting ongoing monitoring of customer transactions to identify any unusual or suspicious activity.

Customer Due Diligence (CDD)

NexGen will conduct Customer Due Diligence (CDD) at the outset of the business relationship and on an ongoing basis. Enhanced Due Diligence (EDD) will be applied to high-risk clients, which may include:

- Clients from high-risk jurisdictions.
- Politically Exposed Persons (PEPs).

- Clients involved in high-value transactions or unusual patterns of transactions.

Transaction Monitoring

NexGen will implement systems and controls to monitor customer transactions for suspicious activity. This includes:

- Reviewing transaction patterns.
- Identifying and investigating unusual or large transactions.
- Maintaining records of transactions and analysis for a minimum of five years.

Reporting Suspicious Activities

NexGen employees are required to report any suspicious activities to the AML Compliance Officer immediately. The Compliance Officer will investigate and, if necessary, file a Suspicious Activity Report (SAR) with the relevant authorities.

Training and Awareness

NexGen will provide ongoing AML training to all employees to ensure they understand their responsibilities and are aware of the latest AML regulations and typologies. Training will cover:

- Identification and reporting of suspicious activities.
- KYC and CDD procedures.
- Regulatory requirements and updates.

Record Keeping

NexGen will maintain comprehensive records of all customer information, transaction data, and AML-related documentation for at least five years. These records will be readily available for inspection by regulatory authorities.

Independent Audit

NexGen will conduct regular independent audits of our AML program to assess its effectiveness and compliance with regulatory requirements. Findings from these audits will be used to improve our AML practices continuously.

Conclusion

NexGen Asset Management is committed to maintaining a robust AML program to prevent money laundering and terrorist financing. Compliance with this policy is mandatory for all employees, officers, and affiliates. Any questions or concerns regarding this policy should be directed to the AML Compliance Officer.

Contact Information:

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