



# Anti-Money Laundering

Company policy document

**GNGIM**

# PRINCIPLES FOR IMPLEMENTING PROVISIONS RELATED TO MONEY LAUNDERING

Issued by Global NFT Group Investment Management 5<sup>th</sup> of February 2022. Last updated 19<sup>th</sup> of December 2024.

## 1. PURPOSE

These principles have been laid down to ensure that Global NFT Group Investment Management fulfils its obligations under the Act relating to measures to combat money laundering and the financing of terrorism (Money Laundering Act) and appurtenant regulations (“money laundering provisions”). The infrastructure for anti-money laundering and combating the financing of terrorism (AML/CFT) on Curaçao finds its legal basis in the National Ordinance on identification when rendering services (LID) and the National Ordinance on the reporting of unusual transactions (LMOT).

## 2. ROLES & RESPONSIBILITIES

Global NFT Group Investment Management (GNGIM) are responsible for maintaining up-to-date guidelines and routines in conjunction with The National Ordinance on Identification when rendering services (LID) area of responsibility and GNGIM, respectively, for supplementing these principles and for ensuring that the Fund fulfils its obligations under the money laundering provisions. The internal guidelines and routines for these operational areas must ensure that risk-based customer due diligence measures, ongoing monitoring of customer relationships and other necessary measures are applied in the operational areas in accordance with the money laundering provisions.

The operational areas are responsible for identifying and assessing the risk of money laundering associated with their activities and implementing customer due diligence measures, if necessary, and for following up the routines on an ongoing basis. Risk assessment, incident reporting, documentation of controls, etc. must be included in general compliance and operational risk management.

These routines shall be adapted, if necessary, and followed up by The Fund and through the exercise of ownership rights in majority-owned subsidiaries, with the necessary adaptations to foreign legal rules and statutory requirements as and when required.

## 3. ANTI-MONEY LAUNDERING OFFICER

GNGIM appoints a member of the Fund’s staff (“anti-money laundering officer”) with special responsibility for The Fund’s overall implementation of the Fund’s guidelines and routines in the area of money laundering.

The anti-money laundering officer is responsible for ensuring the implementation and follow-up of the routines in the organisation. The anti-money laundering officer shall also, as part of this, evaluate the need for and suggest updates and supplements to the routines and support the organisation in the understanding of and compliance with the money laundering provisions. The anti-money laundering officer is authorised to stop transactions that may be in violation of the money laundering provisions.

The anti-money laundering officer must notify the National Ordinance on the reporting of unusual transactions (LMOT) in Curacao of The Fund's reporting obligation pursuant to the money laundering provisions and verify that LID receives the information required.

GNGIM senior management are responsible for ensuring that an adequate investigation is conducted and for clearly identifying who will conduct the investigation within their respective operational areas. Before LMOT is notified, the anti-money laundering officer must as far as possible consult and cooperate with the appropriate compliance function.

## **4. INTERNAL REPORTING OBLIGATION**

Any member of staff who suspects that a transaction is associated with proceeds from a criminal act pursuant to money laundering legislation must without delay notify his or her immediate superior and the relevant compliance function. The Chief Compliance Officer must notify the anti-money laundering officer in accordance with Section 3 of these principles.

## **5. STAFF TRAINING**

The operational areas are responsible for ensuring that staff members receive the necessary training. Training should include identifying tasks performed by staff members that may involve a high risk of transactions linked to money laundering or terrorist financing. Staff members shall not make customers or third parties aware of internal investigations, submission of cases to LMOT or criminal investigations.

## **6. REPORTING**

The anti-money laundering officer shall ensure that the Executive Board is informed regarding money laundering risk and compliance with the money laundering provisions in the organisation. The risk and compliance functions of the two operational areas shall regularly report on these topics for their areas to the anti-money laundering officer. The reporting to the Executive Board shall as a rule be integrated with the organisation's consolidated reporting on risk and compliance. In addition, in cases pertaining to compliance with the Money Laundering Act, General Counsel has the right and duty to report directly to the Executive Board when General Counsel finds it necessary.

## **7. AUTHORISATIONS**

The Senior Management of GNGIM are authorised to lay down further rules and procedures specific to their respective operational areas to ensure that The Fund's obligations under the money laundering provisions are fulfilled.

## **8. ENTRY INTO FORCE**

As amended on 19<sup>th</sup> of December 2024, these principles enter into force immediately.