

Threesixty Elements S.A. Statement of Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) Policies and Principles

I. Anti-money laundering and Compliance

As part of the Investment managers and all Funds' responsibility for the prevention of money laundering, the Investment Manager, the Fund or any of their respective subsidiaries, affiliates, directors, officers, shareholders, employees, agents, and permitted delegates will require a detailed verification of the applicant's identity and the source of the payment from any person delivering a completed subscription application to all Funds (the "Investor").

In order to comply with regulations aimed at the prevention of money laundering verification of identity from all prospective investors to the extent required under applicable law in the British Virgin islands and all other countries we in which we operate.

In accordance with the BVI AML (Amendment) Regulations, 2015 and and relevant legislation of other countries, the Financial Services Business Provider should maintain the following anti-money laundering procedures (as described under the Anti-Money Laundering Regulations):

- identification and verification procedures;
- record keeping procedures;
- internal reporting procedures (including the appointment of the Reporting Officer and Compliance Officer);
- a written system of internal controls and communication procedures (including the adoption of policies and procedures to prevent the misuse of technological developments for the purpose of money laundering or terrorist financing); and
- procedures for Staff anti-money laundering training and awareness.

Prior to transact any type of business Company shall determine and document the true identity of the Investor and obtain background information on the Investor as well as purpose and intended nature of the business.

Company shall obtain and document any additional information, commensurate with the assessment of the money laundering risk using Risk Based Approach.

Company shall establish whether the Investor is acting on behalf of another natural person or legal entity as trustee, nominee or professional intermediary. In such cases a necessary precondition for the Investor acceptance is receipt of satisfactory evidence of the identity of any intermediaries and of the persons upon whose behalf they are acting, as well as the nature of the trust arrangements in place.

Records must be kept of all documents obtained for the purpose of identification and all transaction data as well as other information related to money laundering matters in accordance with the applicable anti-money laundering laws/regulations, all records must be kept for at least 5 years.

Depending on the circumstances of each subscription, it may not be necessary to obtain full documentary evidence of identity where:

- the prospective investor makes the payment for his investment from an account held in the prospective investor's name at a recognized financial institution;

- the prospective investor is regulated by a recognized regulatory authority and is based or incorporated in, or formed under the law of, a recognized jurisdiction; or
- the subscription is made by an intermediary acting on behalf of the prospective investor and such intermediary is regulated by a recognized regulatory authority and is based or incorporated in, or formed under the law of, a recognized jurisdiction

and also if the Investor is:

- a licensed credit institution;
- a professional participant of securities market;
- a management company of an investment fund or a private pension fund.

These exceptions will only apply if the financial institution or intermediary referred to above is within a country recognized as having sufficient anti money laundering regulations. These exceptions may not apply due to the requirements of jurisdictions other than the British Virgin Islands.

Subscriptions for the Shares will be received by the Company, or it may delegate this function to the Administrator (hereinafter referred to as the “Responsible Organization”). If the Investment Manager carries out AML and KYC procedures by itself, the organization establishes qualification requirements to special officers responsible for internal control rules implementation. Such requirements include:

a) higher degree in the diploma professions and areas of training related to the Economics and Management consolidated group of professions and areas of training, or to the Legal Studies area of training, and in absence of the above degree – experience of work during at least 2 years in the positions connected with performance of duties to counteract to legalization (laundering) of proceeds obtained from crime and financing of terrorism;

b) training in order to prevent legalization (laundering) of proceeds obtained from crime and financing of terrorism in accordance with this decision.

A person with outstanding or not canceled conviction for economic crimes or crimes against the state authority may not be a special officer responsible for internal control rules implementation.

The responsible organization will notify applicants to collect the following documents with respect to the Investor:

1. For Individuals:

- Passport and other relevant pages, indicating full name, nationality, place and date of birth, issue and expiry dates, passport number, country of issue and signature or a driver’s license;
- Utility bill showing permanent residential and mailing address.

1. For legal entities:

- Passport and other relevant pages, indicating full name, nationality, place and date of birth, issue and expiry dates, passport number, country of issue and signature or a driver’s license for each director, shareholder and beneficial owner;

- Utility bill showing permanent residential and mailing address for each director, shareholder and beneficial owner;
- Certificate of Incorporation;
- Certificate of Good Standing or other documentary evidence that the corporate entity exists and has not been struck off or dissolved;
- Certificate of Incumbency, showing names of directors and shareholders;
- Copy of company's Memorandum and Articles of Association;
- Document detailing the address of the company's registered office.

Documents shall be provided in originals or in form of copies duly certified as a true copy by a notary public, law firm or bank.

Moreover, before beginning work with the corporate Investor to receive information about the purpose of establishing and expected nature of business relations with this organization performing operations with funds or other property, and regularly take measures, justified and available in the present circumstances, to determine purposes of financial and commercial activities, financial condition and business reputation of the customers.

The responsible organization or its respective subsidiaries, affiliates, directors, officers, shareholders, employees, agents, and permitted delegates reserve the right to request such documentation as any of them deems necessary to verify the identity of the applicant and to verify the source of the relevant money. Applicants who are existing customers and believe they have supplied documentation verifying their identity to the manager or fund or an affiliate in the past may contact the responsible organization to determine whether any additional information is necessary. Failure to provide the necessary evidence may result in applications being rejected or in delays in redemptions or in the dispatch of documents and the issuance of shares.

Pending the provision of satisfactory evidence as to identity, the evidence of title in respect of Shares may be retained at the absolute discretion of the responsible organization. If within a reasonable period of time following a request for verification of identity, the responsible organization has not received evidence satisfactory to it as aforesaid, they may, in their absolute discretion, refuse to allot the Shares applied for in which event application moneys will be returned without interest to the account from which such moneys were originally debited.