



## Anti-Money Laundering

Effective Date: February 1, 2021

### 1. Scope

Nagele, Gordan & Partners Asset Management Ltd. (collectively, “NG&PAM”) are committed to the highest level of compliance regarding international Anti-Money Laundering and Counter-Terrorism Financing.

Therefor we support and comply with the Labuan Anti-Money Laundering and Counter-Terrorism Financing Act 2001 (Act 613) (‘the AML legislation’). This act is aimed at detecting and addressing the risk of money laundering and the threat to national security caused by the financing of terrorism.

You can read the full act here:

[https://www.labuanibfc.com/clients/Labuan\\_IBFC\\_78C2FF81-703A-4CAA-8926-A348A3C91057/contentms/img/Downloads/Legislation/relevant-acts/Anti-Money-Laundering-Act-2001-Act-613.pdf](https://www.labuanibfc.com/clients/Labuan_IBFC_78C2FF81-703A-4CAA-8926-A348A3C91057/contentms/img/Downloads/Legislation/relevant-acts/Anti-Money-Laundering-Act-2001-Act-613.pdf)

The AML legislation imposes obligations on a wide range of financial service providers (known as Reporting Entities), including those in the banking, life insurance, managed funds and superannuation sectors. Key requirements include confirming the identity of customers/investors, prior to providing a designated service, undertaking ongoing customer due diligence, and reporting any suspicious matters that may arise.

As a reporting entity and provider of designated services NG&PAM is required to take all reasonable steps to verify the identity of investors making applications into the various Funds offered by NG&PAM prior to accepting the investment.

For more detailed information on the AML legislation please refer to the Labuan website <https://www.labuanibfc.com/>

### 2. NG&PAM’s approach to compliance with the AML legislation.

NG&PAM requires all investors who wish NG&PAM to manage their assets to complete the Investor Identification Form, which is part of the application form for each new client.

During the lifetime of the NG&PAM asset management, we may request identification/verification documentation or other information to verify the details provided, in compliance with AML legislation. NG&PAM reserves the right to seek out additional information or documents as it believes necessary to comply with AML legislation.

As part of our due diligence, NG&PAM may perform searches with relevant authorities, including but not limited to the Ministry of Home Affairs (MOHA) and the United Nations High Commissioner for Refugees (UNHCR), to verify the identity, status, and compliance of individuals or entities. Where documentation is provided in languages other than English, an English translation from a NAATI-accredited translator must be provided.



We are required to verify the identity of legal representatives and agents appointed to act on behalf of an investor. We cannot proceed to act on the instructions of a nominated legal representative until such time as we verify the identity of that representative. Appointed legal representatives include, but are not limited to, executors of estates, attorneys (appointed under power of attorney) and nominated representatives.