

NEXUSICO ANTI-MONEY LAUNDERING (AML) POLICY

This Policy represents the basic standards of Anti-Money Laundering and combating Terrorism Financing (hereinafter collectively referred to as AML) procedures of NexusICO Capital llc., (also referred to as 'company'). NexusICO drafted its AML policy in compliance with the Federal laws with respect to money laundering and terrorist financing. This policy is currently in effect and its copies are distributed to all stakeholders. It is mandatory for all users and employees to abide by the policy, any conflicts arising out of the policy are subject to review and will be settled in the UK court of law.

DEFINITIONS

MONEY LAUNDERING

Money laundering refers to the act of turning illicit money into licit without a trace. Money laundering is a generic term used to describe any process that conceals the origin or derivation of the proceeds of crime so that the proceeds appear to be derived from a legitimate source.

Traditionally, money laundering has been described as a process that takes place in three stages as follows:

- **Placement** – This is the first stage in which illicit funds are separated from their illegal source. Placement involves the initial injection of the illegal funds into the financial system or carrying of cash across borders.
- **Layering** – After successfully injecting the illicit funds into the financial system, laundering them requires creating multiple layers of transactions that further separate the funds from their illegal source. The purpose of this stage is to make it more difficult to trace these funds to the illegal source.
- **Integration** – This is the final stage in a complete money laundering operation. It involves reintroducing the illegal funds into the legitimate economy. The funds now appear as clean income. The purpose of the integration of the funds is to allow the criminal to use the funds without raising suspicion that might trigger investigation and pursuit.

Often it is not money that is being laundered but other forms of property that directly or indirectly represent benefit from crime. Any form of tangible or intangible property is capable of representing another person's benefit from crime. The main objective of the money launderer is to transform 'dirty' money into seemingly clean money or other assets in a way to leave as little trace as possible of the transformation.

Both, domestic and international Anti-money laundering laws apply to multinational Investment Companies and NexusICO Capital llc., is no exception. The Company is thoroughly committed into this cause and has set forth stringent AML policies applicable to every patron of NexusICO LLC., The company abides strictly to the provisions of counter-terrorism financing, drug trafficking, fraud and robbery laid out in the policy and demands that its employees are compliant and observe these standards fully. The company takes all necessary measures to detect and avoid money laundering and related crimes. Our corporate policies are updated with the latest AML guidelines and are observed in accordance with the relevant international standards.

TERRORIST FINANCING

Terrorist financing is the act of providing financial support to acts of terror, terrorists or terrorist organizations to enable them to carry out terrorist activities. Unlike other criminal organizations, the primary aim of terrorist groups is non-financial. Yet, as with all organizations, terrorist groups require funds in order to carry out their primary activities. This simple fact – the need for funds – is key in fighting terrorism. Follow the money. Follow the financial trail. This is the core objective of all measures that aim to identify, trace, and curb terrorist financing.

There are similarities and differences between money laundering and terrorist financing.

Differences include, Terrorist financing is an activity that supports future illegal acts, whereas money laundering generally occurs after the commission of illegal acts; legitimately derived property is often used to support terrorism, whereas the origin of laundered money is illegitimate.

Similarities include, Terrorist groups are often engaged in other forms of criminal activity which may in turn fund their activities; both money laundering and terrorist financing require the assistance of the financial sector.

The key to the prevention of both money laundering and terrorist financing is the adoption of adequate customer due diligence (CDD) measures by all patrons both at the commencement of every relationship and on an on-going basis thereafter.

GOALS & OBJECTIVES

The objective of implementing Anti-Money laundering procedures at NexusICO is to control the Company's influx of cash and ensuring legitimacy in all user transactions, while simultaneously reducing the compliance burden on all authorized patrons. Reasonable standards have been maintained in adopting the policies throughout different financial divisions of the Company. NexusICO is committed in assisting governments to combat the threat of money laundering and terrorist financing activities around the world, it has set up a sophisticated electronic system that monitors all transactions. This system documents and verifies patron identification records, tracks and maintains detailed records of all transactions.

The Company may provide comprehensive information on any suspicious transactions to law enforcement bodies in a timely manner. In order to safeguard the business and to uphold reporting systems integrity, the legislative framework provides legal protection to providers of such information.

In order to lower the risk of financing terrorist activities and money laundering, NexusICO neither accepts cash deposits nor disburses cash under any circumstances. The Company reserves the right to refuse to further process a transfer at any stage if the company believes that the transactions are somehow connected to any criminal activity or money laundering. It is also restricted for NexusICO to inform patrons that they have been reported for suspicious activity.

Other objectives pursued by this Policy are as follows:

- Promote a “Know Your Customer” policy as a cornerstone principle for the business ethics and practices.
- Introduce a controlled environment where no business with a Customer is transacted until all essential information concerning the Customer has been obtained.
- Conduct self-assessments of compliance with AML policy and procedures.

Adherence to this policy is absolutely fundamental for ensuring fully comply with applicable antimoney laundering legislation.

The company is committed to examining its anti-money laundering strategies, goals and objectives on an ongoing basis and maintaining an effective AML Policy. Company is obliged to follow the 40+9 recommendations given by the FATF Financial Action Task Force.

DEPOSITS & WITHDRAWALS

NexusICO currently accepts deposits and withdrawals in Cryptocurrency only, while depositing funds, the information provided should accurately match the patron's account information. Fund transfers from one person to another are strictly prohibited, however, the funds can be moved across different users in the form of vouchers. We will refuse any third-party checks that have not been verified by our finance officer. In case there is any discrepancy in a transaction, the company reserve the right to cancel or refuse the transaction.

Furthermore, any third party is prohibited from making transactions in replace of the Patron. Likewise, in any withdrawal process, the recipient information should accurately match that of the account holder's information. Withdrawal of funds through an online payment system is allowed only at the same account or wallet from where it has been deposited. These guidelines have been implemented to protect the company and its patrons.

In case of any inquiries, please contact us through email.

OUR COMMITMENT

We are committed to complying fully with all applicable laws and regulations relating to combating money laundering and any activity which facilitates the funding of terrorist or other criminal enterprises. We are responsible for uncovering or reporting any activity that might constitute, indicate or raise suspicions of money laundering. To this end, we provide continuing education and training for all such persons.

NexusICO Capital LLC., is required to comply with all trade and economic sanctions imposed by OFAC against targeted foreign countries and shall cooperate fully with government agencies, self-regulatory organizations and law enforcement officials. As required by the Act, NexusICO Capital LLC., may supply information about former, current or prospective clients to such bodies.

CDD PROCEDURES IMPLEMENTED

1. IDENTIFY AND VERIFY THE IDENTITY OF APPLICANTS FOR BUSINESS

This is done by identifying and verifying the identities of applicants for business whether they are Directors, Shareholders, Beneficial Owners, Settlers or Contributors of capital, Beneficiaries, Protectors, Enforcers, Trustees, Bank mandate and Power of Attorney holders, etc. by verifying:

- Full Name
- Permanent residential address
- Date of birth
- Place of birth
- Nationality

NexusICO requests all patrons to provide a legal government-issued document with a clear picture which serves as their identification proof, the accepted forms of ID proofs are given below. NexusICO Capital also requires a completed and physically-signed account application form to be submitted to the company. All patrons are obliged to submit revised contact information in case any changes occur, this must be done at the earliest opportunity. Any document/s which are not in English are required to be translated to English by an official translator, along with being stamped by the translating authority. These documents should be self-attested and sent with the most recent photo attached. The accepted forms of identity proofs are:

- Current valid passports
- National Identity cards
- Current valid driving license
- A recent utility bill (which is less than 3 months old)
- A recent bank or credit card statement (as such PO Box addresses are not acceptable as permanent residential addresses of clients. Some countries have P.O Box addresses such as in Middle East and Africa) (which is less than 3 months old)
- A recent bank statement (which is less than 3 months old)
- A domestic passport (page with registration address)

In case if client is not an individual but is a legal person or arrangement:

(i) A Private company

- (a) Obtain an original or appropriately certified copy of the certificate of incorporation or registration.
- (b) Check with the relevant companies' registry that the company validly exists.
- (c) Obtain details of the registered office and place of business.
- (d) Verify the identity of the principals of the company.
- (e) Verify that any person who purports to act on behalf of the company is so authorized, and identifying that person.

(ii) A Trust

- (a) Obtain a copy of a trust deed or pertinent extracts thereof.
- (b) Where the trust is registered – check with the relevant registry to ensure that it does exist.
- (c) Obtain details of the registered office and place of business of the trustee.
- (d) Verify the identity of the principals of the trustee as per (1) and or (2) above.

(iii) A Partnership

- (a) Obtain a copy of the partnership deed.
- (b) Obtain a copy of the latest report and accounts.
- (c) Verification of the nature of the business of the partnership to ensure that it is legitimate.
- (d) Verifying the identity of the significant partners (20% interest) as above.
- (e) Verifying that any person that purports to act on behalf of the Partnership is so authorized and identifying that person.

ADDITIONAL DUE DILIGENCE MEASURES FOR FINANCIAL INSTITUTIONS

Company must undertake following additional due diligence measures while establishing and maintaining correspondent relationships:

- Obtaining sufficient information about a respondent institution to avoid any relationships with “shell-banks”.
- Determining from publicly available sources of information the reputation of a respondent institution, including whether it has been subject to a money laundering or terrorist financing investigation or other regulatory action.
- Assessing the respondent institution's anti-money laundering and terrorist financing controls on a periodic basis.

Company is bound to comply with the anti-money laundering regulations and international laws. As company is dealing with foreign financial brokerage firms, we must monitor all financial transactions with utmost vigilance and must report suspicious activities to the concerned authorities.

2. MONITORING AND REPORTING OF SUSPICIOUS TRANSACTIONS/ACTIVITY

- All personnel must be diligent in monitoring for any unusual and potentially suspicious transactions/activity basing on the relevant criteria applicable in the jurisdiction of the United Kingdom.
- The reporting of suspicious transactions/activity must comply with the International laws/regulations

3. RECORD KEEPING

- 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 antimoney laundering laws/regulations.
- All records must be kept for at least 6 years

4. TRAINING

- Training on anti-money laundering will be provided to those new employees who work directly with customers and to those employees who work in other areas that may be exposed to money laundering and terrorist financing threats which includes.
- Identification and reporting of transactions that must be reported to government authorities, examples of different forms of money laundering and internal policies to prevent money laundering.
- Follow-up trainings must take place not less than once a year.