



ANTI-MONEY LAUNDERING POLICY

1. Introduction

NVolve Technologies, Inc. (NVolve) and its subsidiaries are committed to the highest standards of Anti-Money Laundering (AML) compliance and requires management and employees to adhere to these standards to prevent use of our products and services for money laundering purposes.

NVolve Technologies, Inc. will examine its Anti-Money Laundering strategies, goals and objectives on an ongoing basis and maintains an effective Anti-Money Laundering program for the Bank's business that reflects the best practices for a diversified, global financial services provider.

Adherence to the NVolve Technologies, Inc. Anti-Money Laundering Program is the responsibility of all employees. The program is formulated and directed by the Global Head of Anti Money Laundering. The program includes client screening and monitoring requirements, "know your customer" policies (including the requirement to establish the identity of beneficial owners), Embargo policies, record keeping requirements, the reporting of suspicious circumstances in accordance with relevant laws, and AML training.

2. Scope

2.1. Objectives

The standards set out in this Policy are minimum requirements based on applicable legal and regulatory requirements and apply for the entire NVolve Technologies, Inc. These requirements are intended to prevent Deutsche Bank, our employees and clients from being misused for money laundering, terrorist financing or other financial crime. This Policy establishes the general framework for the fight against money laundering and financing of terrorism.

2.2. Applicability

According to Chapter 1 of the Finnish Ministry of the Interior Money Laundering and Terrorist Financing Act (§503/2008 (amendments up to 327/2013 included)), NVolve Technologies, Inc. must ensure that the legal duties resulting from the regulations set out in this Act and the Interior Money Laundering and Terrorist Financing Act are fulfilled by our subordinated enterprises, branches, subsidiaries and affiliates in Finland and abroad.

Wherever local regulations are stricter than the requirements set out in this Policy, the stricter standard has to be applied. If any applicable laws are in conflict with this Policy, the relevant NVolve entity must consult with the local legal department and the Global Head of Anti Money Laundering to resolve the conflict.

If the minimum requirements set out in this Policy cannot be applied in a certain country because application would be against local law or cannot be enforced due to other than legal reasons, NVolve has to assure that it will not

- enter into a business relationship;
- continue a business relationship or;
- carry out any transactions.

If business relations already exist in that country, NVolve has to assure that the business relationship is terminated regardless of other contractual or legal obligations.

2.3. Definition of the Term Money Laundering

Money Laundering is the introduction of assets derived from illegal and criminal activities (Predicate offences) into the legal financial and business cycle. Offences are for example forgery of money, extortionate robbery, drug crime as well as fraud, corruption, organized crime, or terrorism etc. Predicate offences for money laundering are defined by local law. Generally speaking, the money laundering process consists of three "stages":

- Placement: The introduction of illegally obtained monies or other valuables into financial or non-financial institutions.
- Layering: Separating the proceeds of criminal activity from their source through the use of layers of complex financial transactions. These layers are designed to hamper the audit trail, disguise the origin of funds and provide anonymity.
- Integration: Placing the laundered proceeds back into the economy in such a way that they re-enter the financial system as apparently legitimate funds.

These "stages" are not static and overlap broadly. Corporations may be misused at any point in the money laundering process.

3. Minimum Requirements

All NVolve offices and subsidiaries have to comply with the following basic principles:

- Ascertainment of customer identity: - When entering into a lasting business relationship,
 - When performing a single transaction or deal,
 - - Before accepting cash or physical values worth 15.000 EUR (or equivalent) outside an existing business relationship, also when performing a number of smaller payments adding up to this amount (smurfing)
 - - When performing transfer of funds outside an existing business relationship value worth 1.000,- Euro (or equivalent)
- Establishment of purpose of business relationship: When entering into a lasting business relationship, NVolve must obtain information on kind and purpose thereof, if this is not clear from the business relationship itself.
- Identification of Ultimate Beneficial Owner: Whenever NVolve is required to identify a customer, it must establish and verify the identity of the ultimate natural person, - who owns or
 - controls the customer or its assets or
 - on whose behalf the transaction is carried out or the business relationship is established
- Client account monitoring: A permanent monitoring of clients' accounts must be implemented to detect unusual/suspicious transactions. Monitoring must be effected for applicable business areas using adequate processes and systems.
- Correspondent banking: Special attention must be paid to correspondent banking business and adequate security measures must be implemented.
- Forbidden business: Payable through accounts and relationships with shell companies, finance companies and/or banks are forbidden for NVolve and it's subsidiaries.
- Reporting of suspicious circumstances/transactions: Such circumstances/transactions must be reported to the competent authorities according to local law. Group Anti Money Laundering must be informed about all suspicious events, if not explicitly prohibited by local law.
- Staff reliability: NVolve Technologies, Inc. must not employ staff who are deemed not reliable.
- Anti Money Laundering controls: The responsible Anti Money Laundering Officer must ensure by adequate customer- and business related controls that all applicable AML requirements are being adhered to and security measures are properly functioning.
- Anti Money Laundering Training: All employees (including trainees and temporary personnel) responsible for carrying out transactions and/or for initiating and/or establishing business relationships must undergo anti money laundering training. NVolve has decided to extend the target audience for AML to cover all staff. Initial training must be attended within three months after an employee has joined NVolve Technologies, Inc. and subsequently every two years. Minimum content training requirements defined by the Global Head of AML have to be adhered to.
- Anti Money Laundering Risk Analysis: NVolve has set up a system to assess the level of risk exposure considering product and client risk and derive appropriate security measures from this analysis.
- Embargo Requirements: NVolve will adhere to all applicable embargo requirements and will check clients and transactions against applicable embargo lists.

4. Roles and Responsibilities

Vice President of Financial Controls & Governance

- Responsible for NVolve's AML & Embargo strategy.
- Responsible for escalation and sanction in case of non-compliance of internal and external requirements and lack of quality
- Represents AML at Board, Senior Group Committees and at senior corporate level as appropriate
- Manages "Central AML" function, and controls adequacy of organizational structure and resource levels globally
- Drives communication to the Board and other stakeholders with respect to issues concerning AML
- Maintains relationships between AML and the Group's external auditors, regulatory and other authoritative bodies
- Oversees AML's global budget & resources, planning & forecasting processes
- Oversees AML related IT-systems, AML Risk Analysis, change projects, technology, operations, Management Information System (Reporting) and all AML-specific processes
- All Regional AML Heads have a functional reporting line into the Global Head of AML
- Co-Develops an AML advisory approach for each business line
- Responsible for the development of NVolve AML standards & process and regular client review concepts
- Protects NVolve from legal, regulatory and reputational risk with regard to business involving sanctioned persons, entities and / or countries

Vice-President of Corporate Communication

- Develops and maintains the Group Embargo Policy and the Special Risk Clients Policy
- Defines the embargo monitoring requirements
- Co-Develops an AML advisory approach for each business line
- Responsible for the development of NVolve AML standards & process and regular client review concepts
- Protects NVolve from legal, regulatory and reputational risk with regard to business involving sanctioned persons, entities and / or countries
- Are the primary point of contact with their local regulators and law enforcement authorities
- Are responsible for the local AML Risk Analysis
- Are responsible for the implementation of adequate monitoring – research /surveillance tools
- Track and follow up on the conditions that have been imposed as part of AML processes
- Develop and maintain procedures and systems to ensure that unusual and suspicious transactions are reported to NVolve (if not explicitly forbidden by local law) and to local authorities in accordance with local law.
- Develop and carry out adequate controls to ensure that all applicable legal and regulatory AML requirements are being adhered to in their jurisdiction.
- Prepare the legal entity AML Risk Analysis, as appropriate

5. Record Retention

Records must be kept of all transaction data and data obtained for the purpose of identification, as well as of all documents related to money laundering topics (e.g. files on suspicious activity reports, documentation of AML account monitoring, etc.). Those records will be kept for a minimum of 6 years.