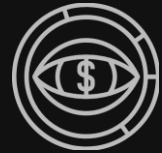




**Independent Compliance Consulting
in the Cayman Islands**

'NATURAL PERSON' MLRO, DMLRO + AMLCO SERVICES

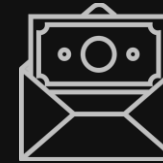
RiskPass provides a comprehensive independent one-stop solution for relevant financial businesses providing experienced 'Natural Persons' for all aspects of Cayman's AML Regulations



Independent MLRO



Independent DMLRO



Independent AMLCO



Policy + Procedure
Manual



Annual Training



Periodic Reporting to
Directors



- An experienced professional from RiskPass will act as Money Laundering Reporting Officer (MLRO) and/or Deputy MLRO for any relevant financial business
- As MLRO/DMLRO, our team member:
 - Receives reports relating to suspicion of money laundering or terrorist financing
 - Investigates the information provided in the report
 - Makes a determination as to whether a report of suspicious activity should be made to the Financial Reporting Authority as the relevant authority
- Our team member will also ensure:
 - Key staff are properly trained in their responsibilities and reporting obligations

An MLRO acts independently of the relevant financial business and does not report to the relevant financial business



- An experienced professional from RiskPass will act as Anti-Money Laundering Compliance Officer (AMLCO) for any relevant financial business
- As AMLCO, our team member:
 - Reports directly to the board of the relevant financial business as and when required
 - Periodically reviews the adequacy of AML systems and controls
 - Ensures the relevant financial business complies with its statutory obligations
- As AMLCO, our team member will function as the point of contact with CIMA as the relevant authority

POLICIES AND PROCEDURES MANUAL



- RiskPass will design a Policies and Procedures Manual in accordance with AML/CTF legislation that meets the investment objectives and the legal structure of the relevant financial business
- RiskPass will periodically review the Policies and Procedures Manual to ensure it remains fully compliant with AML/CTF legislation, regulations, and guidance

ANNUAL TRAINING



- RiskPass will provide AML specific training to all key members of a relevant financial business
- This training will be available via industry training sessions or on-line training
- Training will focus on all relevant legislation, regulations and guidance

PERIODIC REPORTING



- The RiskPass AMLCO will provide periodic reporting to the directors of the relevant financial business.
- Reports will include all requirements as outlined in the AML Regulations