# Vigilshore Anti-Money Laundering (AML) Policy

Compliance and Governance

Introduction
Vigilshore is committed to complying with all applicable Anti-Money Laundering (AML) laws and regulations in the jurisdictions in which we operate. As a risk management and venture equity firm, we recognize the importance of detecting and preventing money laundering activities within our operations and ensuring that our business practices do not facilitate financial crime.
Objective
The objective of this policy is to establish Vigilshore's commitment to preventing money laundering and terrorist financing, ensuring that we meet legal and regulatory requirements, and safeguarding the integrity of our business activities.
Scope
This policy applies to all employees, contractors, and agents of Vigilshore across all operational jurisdictions. It covers all transactions involving clients, including the handling of client funds and access to sensitive financial information.
Customer Identification and Verification
While Vigilshore does not conduct extensive background checks on entities prior to entering a business relationship, we remain vigilant and report or investigate any suspicious activities or signs of money laundering. Vigilshore ensures that all customer transactions are monitored for any potentially illicit activities, and any transactions or relationships that raise concerns are promptly investigated.

Vigilshore has a dedicated Compliance and Governance team responsible for overseeing the implementation of this AML policy and ensuring adherence to applicable AML laws and regulations. The team ensures that Vigilshore remains compliant with both domestic and international legal requirements regarding money laundering prevention.

### **Internal Controls and Monitoring**

Vigilshore maintains internal controls designed to detect and prevent money laundering activities. These controls include monitoring transactions for any signs of illicit activity, including unusual financial transactions or transfers. Any offers or receipts that raise suspicions of money laundering are thoroughly investigated by our compliance team.

### Training and Awareness

While specific training for employees is not currently conducted, the principles of anti-money laundering are clearly outlined in our public policy. All staff are expected to be aware of the signs of money laundering and are instructed to report any concerns through our established channels.

#### Communication and Reporting

Vigilshore maintains internal communication channels to ensure that employees can report any suspicious activities promptly. In the case of suspected fraud or money laundering activities, Vigilshore will fully cooperate with law enforcement and regulatory authorities. We also have a whistleblower policy in place to encourage employees to report any concerns in a safe and confidential manner.

#### Audits and Reviews

Vigilshore conducts periodic audits and reviews of its anti-money laundering practices to ensure their effectiveness and compliance with both internal policies and legal requirements. These reviews are essential for maintaining the integrity of our operations and identifying any potential areas for improvement.

## Cooperation with Authorities

In the event of fraud or money laundering activities, Vigilshore will cooperate fully with relevant authorities. Suspicious activities will be reported to the appropriate law enforcement or regulatory bodies as required by law.

Vigilshore<sup>a</sup>