

Nemesis Wealth Projects LLC
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GLOBAL ANTI-MONEY LAUNDERING POLICY

Introduction

As a company, we are committed to carrying on business in accordance with the highest ethical standards. This includes complying with all applicable laws and regulations aimed at combating money laundering and terrorist financing. This Policy has been developed by NEMESIS WEALTH PROJECTS LLC to reduce the risk of money laundering and terrorist financing associated with its business and the sale of its products. This Policy explains our individual responsibility in complying with anti-money laundering and counterterrorist financing laws ("AML Laws") around the world and ensuring that any third parties that we engage to act on our behalf, do the same.

The management of NEMESIS WEALTH PROJECTS LLC is committed to complying with all laws. Any employee who violates the rules in this Policy or who permits anyone to violate those rules may be subject to appropriate disciplinary action, up to and including dismissal, and may be subject to personal civil or criminal fines.

Policy Statement on AML

It is Nemesis Wealth Projects LLC's policy to comply with all applicable AML Laws in our operations worldwide. To this end, will only conduct business with customers who are involved in legitimate business activity and whose funds are derived from legitimate sources.

This Policy is intended to help employees, contractors, and other third parties acting on the company's behalf to understand where breaches of AML Laws might arise and to support them in making the right decisions in line with our corporate position as stated in this Policy.

The following types of activities are considered to be "money laundering" and are prohibited under this Policy:

- a) the conversion or transfer of property (including money), knowing or suspecting that such property is derived from criminal or certain specified unlawful activity ("criminal property"), for the purpose of concealing or disguising the illicit origin of the property or of assisting any person who is involved in the commission of such activity to evade the legal consequences of his action;
- b) conducting a financial transaction which involves criminal property;
- c) the concealment or disguise of the true nature, source, location, disposition, movement, rights with respect to, ownership or control of criminal property;
- d) the acquisition, possession or use of criminal property;
- e) promoting the carrying on of unlawful activity; and
- f) participation in, association to commit, attempts to commit and aiding, abetting, facilitating and counseling the commission of any of the actions mentioned in the foregoing points.

Compliance controls

Senior management in each NEMESIS WEALTH PROJECTS LLC business are responsible for ensuring that their business has a culture of compliance and effective controls to comply with AML laws and regulations to prevent, detect and respond to money laundering and counter-terrorism financing and to communicate the serious consequences of non-compliance to employees.

Non-compliance

Any NEMESIS WEALTH PROJECTS LLC employee or contractor, who violates this Policy may be subject to appropriate disciplinary action.