



## **Anti-Money Laundering (AML) Policy**

Reign Capital Limited (hereafter referred to as “**Reign Capital**” or “**RC**”) is committed to preventing its business from being used for money laundering and related financing crimes activities, and to complying fully with applicable anti-money laundering laws, regulations, and related requirements, including economic and trade sanctions, enforced in the UK.

To this end, Reign Capital has implemented its Anti-Money Laundering Policy which is strictly adhered to and has been developed in compliance with the applicable anti-money laundering laws and regulations.

### **Customer Due Diligence (CDD)**

In order to ensure CDD, Reign Capital shall be conducting customer identification and verification. This will involve identifying our clients and, where applicable, the beneficial owners, and then their identities. We shall also keep a check on the purpose and intended nature of our investor’s business and collect information about the client and, where relevant, the beneficial owner. This will be sufficient for RC to obtain a complete picture of the risk associated with the business relationship and provide a sound basis for subsequent monitoring.

### **High-risk customers**

Under Money Laundering Regulations, high-risk customers, including Politically Exposed Persons (PEPs,) must be subject to Enhanced Due Diligence (EDD) and enhanced ongoing monitoring. For PEPs we will identify the source of funds and the source of wealth and obtain specific senior management approval for establishing a business relationship.

We shall maintain governance arrangements, which shall require senior management approval for the establishment (or continuation) of business relationships with high-risk clients. Our senior management includes the Director of Risk & Compliance; Operations; Investment, and a formal governance committee.

### **Transaction Monitoring**

Reign Capital shall be conducting ongoing monitoring of business relationships and will also implement appropriate measures for monitoring and scrutinizing transactions through the course of a business relationship. RC shall also assess whether our customers’ activities are consistent with our knowledge and the risk profile of the customer, which will help in ensuring that the CDD records are kept up to date accordingly.

### **Training and Awareness**

Reign Capital shall be conducting frequent training programs for staff and employees by using both computer-based training and classroom-style methods. The content of the training shall include a mixture of generic and specific training programs. This will help in ensuring that members are well-informed about what practices they must follow while working at Reign Capital.

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