



INTEGER WEALTH GLOBAL

POLICY DOCUMENT – 20220922/01

IWG Compliance for establishment of an AIF

22 September 2022

Compliance Policy for Integer Wealth Global (including investment distribution)

1. Introduction

This Compliance Policy outlines the principles and procedures that Integer Wealth Global adheres to in order to ensure compliance with applicable laws, regulations, and industry standards in the management and distribution of invested funds into commercial and industrial projects in Europe.

2. Regulatory Framework

Integer Wealth Global operates in accordance with the following key regulations and directives:

- **Alternative Investment Fund Managers Directive (AIFMD):** Governs the management, marketing, and distribution of alternative investment funds within the EU.
- **General Data Protection Regulation (GDPR):** Ensures the protection of personal data and privacy of individuals within the EU.
- **Anti-Money Laundering (AML) Regulations:** Prevents money laundering and financing of terrorism through stringent KYC (Know Your Customer) and reporting requirements.

3. Governance and Oversight

- **Board of Directors:** Responsible for overseeing the implementation and effectiveness of the compliance policy.
- **Compliance Officer:** Appointed to ensure adherence to regulatory requirements and internal policies.
- **Internal Audit:** Conducts regular audits to assess compliance with policies and procedures.

4. Risk Management

- **Risk Assessment:** Regularly conducted to identify, assess, and mitigate potential risks associated with investment activities.
- **Due Diligence:** Comprehensive due diligence is performed on all investment opportunities to ensure compliance with legal and regulatory standards.

5. Investment Management

- **Investment Strategy:** Clearly defined and aligned with regulatory requirements and company objectives.



- **Portfolio Management:** Managed by qualified professionals to ensure prudent investment decisions and compliance with investment guidelines.
- **Reporting:** Regular and transparent reporting to investors and regulatory authorities.

6. Distribution of Funds

- **Marketing and Distribution:** Conducted in compliance with AIFMD and local regulations in each jurisdiction.
- **Investor Relations:** Maintained through clear communication, transparency, and adherence to investor protection standards.

7. Data Protection

- **Data Security:** Implemented robust measures to protect personal and sensitive data in compliance with GDPR.
- **Privacy Policy:** Clearly communicated to all stakeholders, outlining the company's data handling practices.

8. Anti-Money Laundering (AML)

- **KYC Procedures:** Strict KYC procedures are in place to verify the identity of investors and counterparties.
- **Suspicious Activity Reporting:** Any suspicious activities are promptly reported to the relevant authorities.

9. Training and Awareness

- **Employee Training:** Regular training programs are conducted to ensure employees are aware of compliance requirements and best practices.
- **Compliance Culture:** Fostered through continuous education and awareness initiatives.

10. Monitoring and Review

- **Continuous Monitoring:** Ongoing monitoring of compliance with policies and regulatory requirements.
- **Policy Review:** Regular review and update of the compliance policy to reflect changes in regulations and business practices.

11. Reporting and Accountability

- **Incident Reporting:** Clear procedures for reporting compliance breaches or incidents.
- **Accountability:** Defined roles and responsibilities to ensure accountability at all levels of the organization.



12. Conclusion

Integer Wealth Global is committed to maintaining the highest standards of compliance in all its operations. This policy serves as a framework to ensure that our investment management and distribution activities are conducted with integrity, transparency, and in full compliance with applicable laws and regulations.