



INTEGER WEALTH GLOBAL

Policy on Asset Management for Alternative Investment Funds

Date: 09 September 2022

Policy Statement

Integer Wealth Global Group and all its member companies strive to deliver high-quality fund management, investment and related management services.

An acceptable usage policy for an alternative investment fund (AIF) outlines the guidelines and restrictions on how the fund's resources can be used. This policy ensures compliance with legal and regulatory requirements, promotes ethical behavior, and protects the interests of investors

1. Purpose

This policy establishes the acceptable use of resources and assets within Integer Wealth Global's alternative investment funds (AIF) and such funds created for its clients. It aims to ensure compliance with legal and regulatory requirements, promote ethical behaviour, and protect the interests of investors.

2. Scope

This policy applies to all employees, directors, officers, fund managers and third parties acting on behalf of Integer Wealth Global, its clients and its member companies.

3. Definitions

- 3.1 Alternative Investment Fund (AIF): A collective investment vehicle that invests in assets such as private equity, hedge funds, real estate, commodities, and other non-traditional investments.
- 3.2 Fund Manager: An individual or entity responsible for making investment decisions and managing the assets of the AIF.



4. Legal and Regulatory Compliance

All activities related to the AIF must comply with applicable laws and regulations, including but not limited to:

- 4.1 The Alternative Investment Fund Managers Directive (AIFMD).
- 4.2 The Markets in Financial Instruments Directive (MiFID II).
- 4.3 The General Data Protection Regulation (GDPR).
- 4.4 Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) regulations.

5. Acceptable Use of Fund Resources

- 5.1 **Investment Decisions:** All investment decisions must be made in the best interests of the fund's investors and in accordance with the fund's investment strategy and objectives.
- 5.2 **Due Diligence:** Comprehensive due diligence must be conducted before making any investment to assess risks, returns, and compliance with regulatory requirements.
- 5.3 **Risk Management:** Appropriate risk management practices must be implemented to identify, assess, and mitigate potential risks associated with investments.
- 5.4 **Transparency:** Fund managers must maintain transparency with investors by providing regular updates on the fund's performance, investment strategy, and any significant changes.

6. Prohibited Conduct

- 6.1 **Conflicts of Interest:** Fund managers and employees must avoid conflicts of interest and disclose any potential conflicts to the Compliance Officer.
- 6.2 **Insider Trading:** Trading on material non-public information is strictly prohibited.
- 6.3 **Bribery and Corruption:** Offering, giving, receiving, or soliciting anything of value to influence investment decisions or other actions is prohibited.
- 6.4 **Misuse of Fund Assets:** Fund assets must not be used for personal gain or for purposes not aligned with the fund's objectives.

7. Reporting and Whistleblowing

Employees and fund managers are encouraged to report any suspected violations of this policy. Reports can be made anonymously and without fear of retaliation. The company will investigate all reports thoroughly.



8. Consequences for Violations

Violations of this policy will result in serious consequences, including but not limited to:

- 8.1 Disciplinary Action: Employees found to be in violation of this policy may face disciplinary actions, up to and including termination of employment.
- 8.2 Legal Action: Violations may also result in legal proceedings, including criminal charges, fines, and imprisonment.
- 8.3 Reputational Damage: Engaging in prohibited conduct can severely damage the reputation of Integer Wealth Global and its member companies, leading to loss of business and trust.

9. Monitoring and Review

This policy will be reviewed annually and updated as necessary to ensure compliance with legal requirements and best practices.

10. Contact Information

For further inquiries or detailed explanations regarding this policy, clients are encouraged to contact our Chief Liaison Officer at info@integerwealth.global or the legal officer at legal@integerwealth.global.