

## KB Associates (“KBA”) MLRO, Deputy MLRO and Compliance Officer Services

### Regulatory Obligations

As of 1st June 2018, the Cayman Islands Monetary Authority requires all new registering entities to comply with appointing Anti Money Laundering (“AML”) Officers as part of the application process.

The Anti-Money Laundering Regulations (2020 Revision) (the “Regulations”) impose requirements on all Cayman domiciled funds (both regulated and unregulated) to appoint natural persons to perform the roles of AML Compliance Officer (“AMLCO”), Money Laundering Reporting Officer (“MLRO”) and Deputy MLRO (“DMLRO”) (together “AML Officers”).

The same individual may act as AMLCO and either MLRO or DMLRO, however the roles of MLRO and DMLRO must be carried out by separate persons. The DMLRO must be of “similar status and experience to the MLRO”.

<b>AMLCO Role and Responsibilities:</b>	<b>AMLCO Activities: In providing the AMLCO service KBA will:</b>
<p>The AMLCO will be the point of contact with supervisory and other competent authorities and will be responsible for reporting to the Board of Directors (the “Board”) on the fund’s systems and controls and anti-money laundering, combatting the financing of terrorism and financial sanctions (“AML/CFT/FS”) compliance issues. The Board will be reliant on the information and recommendations of the AMLCO in order to satisfy itself that the fund’s statutory obligations are being met.</p> <p>The AMLCO will be suitably qualified and have sufficient skills and experience in the area of compliance, particularly in the areas of AML/CFT/FS. They will be of suitable seniority and authority for the Board to react to and act upon their recommendations.</p>	<ul style="list-style-type: none"> <li>• Develop and maintain the fund’s systems and controls to prevent money laundering (“ML”) and terrorist financing (“TF”);</li> <li>• Report periodically to the Board on the fund’s systems and controls;</li> <li>• Respond promptly to requests for information from the relevant competent authorities;</li> <li>• Maintain logs including those with respect to politically exposed persons and requests from relevant competent authorities;</li> <li>• Advise the Board on AML/CFT/FS compliance issues that require attention;</li> <li>• Ensure regular audits of the AML/CFT/FS program.</li> </ul>
<b>MLRO/DMLRO Role and Responsibilities:</b>	<b>MLRO/DMLRO Activities: In providing the MLRO/DMLRO service KBA will:</b>
<p>The MLRO/DMLRO must be independent and act autonomously. They are the point of contact for suspicious/unusual activity for all staff and will be responsible for filing suspicious activity reports to the authorities.</p> <p>The MLRO/DMLRO will have sufficient expertise in the area of AML/CFT/FS with the ability to identify suspicious activity and transactions. They too will be of suitable seniority and authority.</p>	<ul style="list-style-type: none"> <li>• Be the point of contact for all suspicious activity reports;</li> <li>• Review and consider all suspicious activity reports to determine whether or not they give rise to knowledge or suspicion of ML/TF;</li> <li>• Report suspicious activity to the appropriate authorities.</li> </ul>

KBA offers the provision of suitably qualified professionals to assume the roles of AMLCO, MLRO and DMLRO from its seven person team dedicated exclusively to AML/CFT/FS compliance. Please see biographies on page two.

If you wish to discuss any of the above, please contact Angela Godfrey at [angela.godfrey@kbassociates.ie](mailto:angela.godfrey@kbassociates.ie) or on +353 1 908 1510.

All members of KBA's dedicated Anti-Money Laundering team have experience in the area of anti-money laundering, countering the financing of terrorism and financial sanctions ("AML/CFT/FS") compliance, with a focus on customer due diligence ("CDD"). Each acts as the Money Laundering Reporting Officer to global investment funds and advises them on AML/CFT/FS issues. They are responsible for providing guidance and expertise on CDD documentation to fund boards, reviewing and testing the AML/CFT/FS Process of fund administrators, providing training to directors and reporting to the directors on AML/CFT/FS compliance matters.



## Áine Suttle

Áine has been active in the AML/CFT/FS compliance area since 2007. Prior to joining KB Associates Áine held senior positions at Citi and Bank of America Merrill Lynch with responsibility for CDD across a number of jurisdictions. Áine holds a Master of Arts

in American Literature from University College Dublin and has completed the Professional Diploma in Compliance (LCOI) and the Professional Certificate in Data Protection.

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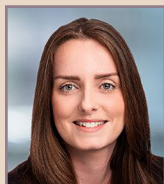


## Deirdre O'Callaghan

Deirdre has been active in the financial services industry since 2006. Prior to joining KB Associates Deirdre was a senior AML specialist at Sumitomo Mitsui Banking Corporation Europe with responsibility for CDD and sanction screening across a number of jurisdictions. Deirdre

holds a Business Studies (Hons) Degree from Dundalk Institute of Technology and has completed a Professional Certificate in Financial Crime Prevention (ACOI).

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## Angela Godfrey

Angela has been active in the financial services industry since 2008. Prior to joining KB Associates Angela was the Senior AML Analyst at Quintillion Limited, with responsibility for CDD across a number of fund types. Angela holds a BA in European Studies from NUI Maynooth and has completed the Professional Diploma in Compliance (LCOI).

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## Lisa McCooey

Lisa has been active in the AML/CFT/FS compliance area since 2015. Prior to joining KB Associates Lisa was a Senior AML Specialist with PwC Ireland with responsibility for supervising the internal AML function. She also worked in various AML/CFT/FS roles with

Citico Fund Services and Regus.

Lisa has completed the Professional Diploma in Compliance with the Institute of Bankers and is a Licentiate member of the Association of Compliance Officers Ireland (LCOI). She also holds a certificate in investment fund foundations with the CFA Institute.

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## Brian Riordan

Brian has been active in the AML/CFT/FS compliance area since 2012. Prior to joining KB Associates, Brian was an AML Supervisor at HSBC Securities Services DAC, with responsibility for investor relationships and CDD across a number of fund types. He has also served

as AML Project Manager and Senior Analyst at Deutsche Bank.

Brian holds a BA in Business Studies from the University of Limerick and has completed the Professional Certificate in Investment Funds (Institute of Banking) and the Professional Diploma in Compliance (LCOI).

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## Clay Dupuy

Clay has been active in the financial services industry since 2006. Prior to joining KB Associates Clay was a senior AML specialist with BNY Mellon Fund Services (Ireland) DAC with responsibility for CDD across a number of jurisdictions. He has also served as Risk and

Compliance officer and MLRO for Harmonic Fund Services in the Cayman Islands.

Clay holds an LL. B (Hons) Degree from Dublin Business School and a Bachelor of Arts Degree from the University of Florida. He has also completed an International Diploma in Governance, Risk, and Compliance (International Compliance Association) and holds a Diploma in Hedge Fund Administration (University of Manchester School of Business).

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## Faye McCrossan

Faye has been active in the AML/CFT/FS compliance area since 2015. Prior to joining KB Associates Faye was Assistant Vice President at Apex Group Ltd. with responsibility for CDD across a number of jurisdictions and fund types.

Faye holds a Bachelor of Business Studies from Maynooth University. She has also completed the Professional Certificate in Compliance with the Institute of Bankers and is an affiliate member of the Association of Compliance Officers Ireland (ACOI).

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