

AML/CFT Policy Statement

Commitment to Combating Financial Crime

Excellion Finance Management, LLC and its affiliates (collectively, "Excellion Finance" or the "Company") are fully committed to the highest standards of compliance with Anti-Money Laundering (AML), Counter-Financing of Terrorism (CFT), and sanctions laws and regulations. We have implemented a robust and comprehensive compliance program designed to prevent our services from being used to facilitate money laundering, terrorist financing, or any other financial crime.

Our commitment is to conduct business with integrity and in full compliance with all applicable legal and regulatory requirements. This policy statement outlines the fundamental principles that govern our AML/CFT framework.

Core Principles of Our Compliance Program

Our AML/CFT program is built upon a risk-based approach and is in line with the recommendations of the Financial Action Task Force (FATF) and the legal framework of the jurisdictions in which we operate. The key pillars of our program include:

1. Customer Due Diligence (CDD)

We perform thorough due diligence on all prospective investors to identify and verify their identities. Our Customer Identification Program (CIP) includes, but is not limited to:

- **Identification:** Collecting identifying information from individual investors, corporate entities, and their Ultimate Beneficial Owners (UBOs).
- **Verification:** Verifying this information using reliable, independent source documents, data, or information.
- **Understanding the Nature of Business:** Gaining an understanding of the investor's business and the intended nature of the investment relationship.

2. Enhanced Due Diligence (EDD) and Source of Wealth (SoW) Verification

For clients or transactions identified as posing a higher risk, we conduct Enhanced Due Diligence. This includes, critically, a thorough verification of the investor's **Source of Funds (SoF) and Source of Wealth (SoW)**. We require clients to provide documentary evidence to support the origin of their capital. We reserve the right to refuse to work with any prospective

investor who is unable or unwilling to provide sufficient information to verify their source of wealth.

3. Sanctions Compliance and Screening

Excellion Finance maintains a strict policy of compliance with all applicable economic sanctions programs, including those administered by the U.S. Office of Foreign Assets Control (OFAC), the United Nations, the European Union, and other relevant authorities. We screen all investors, related parties, and transactions against applicable sanctions lists, both at the onboarding stage and on an ongoing basis. We will not conduct business with individuals, entities, or jurisdictions subject to sanctions.

4. Ongoing Monitoring

Our compliance obligations do not end after the onboarding process. We conduct ongoing monitoring of our relationships and transactions to detect and report suspicious activity. We utilize both manual and automated systems, including blockchain analytics tools, to identify unusual patterns that may be indicative of financial crime.

5. Internal Governance and Training

Excellion Finance has appointed a dedicated Compliance Officer who is responsible for the oversight and implementation of our AML/CFT program. All employees receive regular, mandatory training on their roles and responsibilities in preventing money laundering and terrorist financing.

6. Cooperation with Authorities

We are committed to cooperating fully with all lawful requests from regulatory and law enforcement authorities in the jurisdictions where we operate.

This statement serves as a public declaration of our commitment to maintaining a world-class compliance program. It is subject to periodic review and updates to reflect changes in regulations and best practices.