

GAM FINANCIAL CRIME POLICY STATEMENT

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GAM
Investments

Policy Statement

GAM Investments is committed to protecting clients, employees, and related relevant parties from financial crime activities. Financial crime is defined as any type of criminal conduct relating to money or to financial services or markets, including any offence involving the handling of proceeds of crime, fraud, the financing of terrorism, dishonesty or misconduct relating to financial markets. The effect of financial crime activity is grave, can lead to the damaging of global financial systems, can cause significant losses to individuals and businesses, lead to an erosion of trust in the reputation of entities associated with financial crimes and can also inhibit economic growth.

GAM Investments is committed to establishing and maintaining a framework that seeks to prevent, detect and deter financial crimes. This is achieved primarily by complying with the relevant global legislative and regulatory regimes in, amongst others, the UK, the USA, the EU, Switzerland, Hong Kong and Japan. The financial crime framework to combat the risks of financial crimes is set out in our relevant global financial crime policies.

The relevant financial crime policies require each GAM business, as appropriate, to maintain a financial crime framework which includes:

- a governance and oversight model identifying the relevant stakeholders and personnel in the business responsible for mitigating financial crime risk;
- KYC (know your customer) and due diligence processes and procedures to appropriately identify and verify clients and related parties as well as identifying any relevant risks at the onboarding stages and throughout the relationship with the party until offboarding;
- screening controls where all clients are screened daily to ensure there are no sanction matches and no breaches of the relevant sanctions regimes;
- recordkeeping practices;
- suspicious activity reporting to the relevant governmental authorities;
- a transaction monitoring process to identify potential suspicious activity;
- reporting of suspicious activity to governmental authorities in accordance with relevant requirements;
- training of appropriate personnel to increase awareness on the prevention and detection of financial crimes;
- systems and controls to combat money laundering, terrorist financing, fraud, tax evasion, bribery and corruption and other relevant financial crimes; and
- independent testing to ensure that the programs in place to comply with applicable laws, rules and regulations have been implemented and continue to be appropriately maintained.