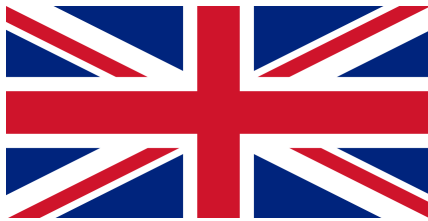


Business Compliance Policy Statement V1.1

Insula Investment Management Ltd

Insula algos and cryptos



RELEVANT JURISDICTION: United Kingdom

GOVERNING BODIES: Financial Conduct Authority (FCA) , and relevant Advertising bodies.

Insula's Know Your Costumer & Anti-money laundering policy statement:

This document provides a framework for how Insula will deal with the threat of money laundering including controls and procedures Insula is taking to prevent risk. We recommend investors to follow the latest trends in terms of cryptocurrency regulation in the United Kingdom. The Financial Conduct Authority's website has extensive documentation on crypto assets.

2019/10/02, London, United Kingdom.

Author: Jules Becci de la Riviere, CEO& Founder.

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I)WORD FROM THE CEO:

Insula - From a current unregulated Initial Token Offering to a future regulated Cryptocurrency Fund Management Company:

Our compliance roadmap for a compliant development through Insula's business cycle:

- **Internal controls and ongoing monitoring of our business:**

We must make sure that our business has adequate internal controls and monitoring systems. These should alert directors and other relevant people in our business if criminals try to use Insula for money laundering.

We are aware of a potential threat, so we take steps to prevent it and report any suspicious activity.

- **According to the law, our controls should include:**
- appointing a 'nominated officer' and making sure that employees know to report any suspicious activity to them
- appointing a compliance officer if your business is larger or more complex
- identifying the responsibilities of senior managers and providing them with regular information on money laundering risks
- training relevant employees on their anti-money laundering responsibilities
- documenting and updating your anti-money laundering policies, controls and procedures
- introducing measures to make sure that the risk of money laundering is taken into account in the day-to-day running of your business

- **Our proof of understanding of the Financial Conduct Authority CEO Letter “CryptoAssets ad Financial Crime” of the 11th June 2018:**

We understand that Insula’s activity may place it under heavy scrutiny, and we are actively setting up a special procedure to deal with sensitive stakeholders operating in the cryptocurrency and blockchain sphere.

We make sure steps are taken to mitigate risk effectively.

Insula’ full dedication to developing breakthrough technology, hire the best talents and become a well-known firm in the domain of financial mathematics applied to cryptocurrency, we believe that we have to adopt today’s largest institutions AML and KYC procedures.

In order to make Insula’s business model a reality, we understand that we need to build impeccable compliance procedure to attract institutional clients, the actors with the highest requirements in terms of legal.

To achieve this goal take compliance very seriously, by following consultation procedures by the Financial Conduct Authority, meeting,

Requirement in terms of Officer nomination:

Jules Becci de la Riviere is occupying the function of both Chief Compliance Officer and Money Laundering Reporting Officer (MLRO). The MLRO supervises the firm’s compliance with its AML obligations. He is a director of the firm as required.

- **Requirements in terms of spontaneous cooperation:**

We engage to monitor and report any suspicious activity to the Financial Conduct Authority and any other relevant bodies in the UK, extended to EU bodies where required and relevant.

II) GENERAL PRECAUTIONS:

Best practices and ethics:



CryptoUK

We find ourselves one of the most well connected and rising cryptocurrencies start up in London.

Insula is part of influence groups that shape cryptocurrency policy:

Insula Investment Management was invited to join the trade body #CryptoUK alongside the largest UK players such as Coinbase, Ripple, Huobi Global, Cumberland and CryptoCompare.

#CryptoUK has been established to promote the development and recognition of digital currency technologies in the UK, and to ensure higher cross-sector standards of conduct and consumer protection.

should not try to adapt existing financial rules to digital currencies." BBC News article. Together, we are working to help inform politicians and regulators about the crypto asset industry, and to work with them in developing an appropriate operating framework for the UK.

-[Financial Times](#) : "Seven crypto companies are forming a UK cryptocurrency trade body named #CryptoUK".

-[BBC News](#) : "Crypto-currency trade body #CryptoUK said it supported new regulation, but said that policymakers should not try to adapt existing financial rules to digital currencies.

The diverse group is made up of exchanges, trading platforms, comparison sites, merchants, asset managers and more. This includes some of the biggest players in the industry such as Coinbase, Etoro and CEX.io. The members believe that cryptocurrencies are misunderstood by governments and regulators, but are willing to work alongside them to help the UK become a leader in this innovative new industry.

CryptoUK wrote an open letter in August to the new Chancellor of the Exchequer to welcome him in his new functions and provide input on the current state of the nascent crypto industry in the UK.



To promote industry best practice, all CryptoUK members subscribe to its principles and self-regulatory Code of Conduct set out below. CryptoUK members are committed to working together to proactively update the Code and ensure it remains fit for purpose in delivering best practice amongst members.

UK POTENTIAL

Members recognise the UK's potential to become a leader in the use and development of crypto assets through the pursuit of supportive policies and regulation, as appropriate.

COLLABORATION

Through engagement and cooperation with political, regulatory and legal bodies, members commit to working together, as representatives of the UK crypto community to:

- advance a supportive UK operating environment for the use and development of crypto assets;
- improve and promote best practice to minimise risk to

consumer and counter illegitimate use of crypto asset technology.

CONSUMER TRUST

Members commit to operating honestly and responsibly in their relationships with consumers, including the proactive disclosure of clear information on pricing, leverage and fees and any associated risks.

TRANSPARENCY

Communications with customers and prospective customers (including marketing and promotional material) must be fair, clear and not misleading – enabling informed decisions to be made, as required.

STRUCTURE

Publicly available platform information must include details of: The full complaints procedure; the senior management team; the legal form of the business, the registered office address and date of launch; arrangements in case of business failure; and any material changes to the business which impacts customers.

INSIGHT

Members commit to undertaking appropriateness checks to ensure that investors are fit and proper to undertake transactions.

SECURITY

Members commit to ensuring the proactive management of IT infrastructure to prevent leakage, loss and damage of personal information, in accordance with data protection regulations.

SEGREGATION

Members commit to segregating fiat customer from company funds, and to ensuring customer funds are payable upon an insolvency event.

REDUCE RISK

For customer funds not being used for trading, liquidity & transfer purposes 90%+ of private keys should be held in cold storage.

DETERRENCE

Where a customer is found to be acting in an illegal manner, members commit to working with the appropriate authorities to prevent, detect and deter such occurrences.

DUE DILIGENCE

In line with anti-money laundering regulations, members commit to undertaking due diligence checks on platform users to protect against illegal activity, including the financing of terrorism.

INTEGRITY

To tackle market abuse, members commit to halting trading if suspicious activity is identified; to suspend and close any accounts engaging in such activity; and to notify the relevant authority.

GENERAL PRECAUTIONS WITH REGARDS TO CUSTOMER ONBOARDING: Insula's automated Know your Customer and Anti Money Laundering Procedure:

If the investor takes a decision to invest in the equity fundraise and or the ICO, he needs to get Whitelisted our dedicated outsourced system: Smart Pools.

SmartPool is a platform that makes pool management and KYC/AML compliance easier than ever for token generation events.



POOL COMPLIANCE

- FULL KYC/AML VERIFICATION**
Every person who join Smartpool is a fully-verified person. Everything is handled by WeStart for free to ensure pool managers full compliance.
- ENSURE PROJECT COMPLIANCE**
Token private pools are undergoing scrutiny and intense regulation. By hosting your private pool on WeStart's SmartPool and undergoing KYC/AML you protect yourself and other pool members of potential legal issues in the future.
- BEST IN-CLASS SECURITY**
With rest and transit encryption, SmartPool is hosted on AWS and inherits the control environment Amazon maintains and demonstrates via SSAE-16 SOC 1, 2 & 3, ISO 27001, FedRAMP/FISMA reports and certifications.

Customer needs to prove his identity by uploading his documents on Smart Pools.



Insula Pool members will be able to join and get whitelisted in a matter of minutes.

Smart Pool stores the documents of the investors. In case of need, Insula will request them.

This allows Insula to remain GDPR compliant as Insula does not store sensible private investors information yet can have access to it, in accordance to the bookkeeping requirements.

-We use SmartPools, a dedicated service provider for automated KYC and AML. Insula does not store any of its users and clients data, with regards to GDPR.

Our procedure is to:

1-Direct users that wishes to proceed to any on chain transaction interaction with Insula's Smart Contract to get whitelisted on SmartPools.

2-Once whitelisted, Insula users shall notify Insula through its official email all@insula.ltd, showing proof of SmartPool Whitelist Tier 3 (Maximal Level of verification available on the platform).

In the framework of the unregulated Initial Utility Token Offering Insula (ISLA), Tier 3 appears at our eyes to comply to FATFA, ADMLD5 and FCA's requirements that we are subject to, in terms of AML, KYC, Anti-Terrorism Checkup and GDPR compliance.

GENERAL PRECAUTIONS ON CRYPTOCURRENCY TAX, TAX EVASION AND ILLEGAL TRANSBOARDER MONETARY FLUXES:

Tax considerations are the responsibility of Insula's users in their respective tax jurisdiction, including tax considerations with regards to Insula Tokens for example, capital gains.

STAFF KNOWLEDGE AND COACHING:



- Insula's commitment to training our employees so they're aware of their responsibilities:

Newly onboarded recruits or stakeholders from other industries tend to underestimate our heavy duty in terms of compliance due to Insula's specific high-risk situation.

Unregulated collective investment schemes in cryptocurrencies in the UK are under severe scrutiny and strict processes need to be determined in advance in order our development to unfold without any regulatory breaches.

Hence we dedicate a large share of our work to taking part in Financial Conduct Authority information mission, regularly stay updated on the next space available for regulatory Sandboxes and attend regulatory events i.e Insula was at the “ “.

- A summary of the monitoring controls that are in place to make sure our policies and procedures are being carried out:
- Recognition of the importance of staff promptly reporting any suspicious activity to the nominated officer:

We proceed to ongoing legal formation of the team to keep all stakeholders constantly aware of the high risk of our industry, and we apply the strictest standards.

We are developing staff knowledge and expertise on cryptoassets to help them identify the clients or activities which pose a high risk of financial crime

KNOW YOUR COSTUMER:



KNOW YOUR CUSTOMER

Other points we focus on following a risk based approach when dealing with clients and or industry partners offering services related to crypto assets:

- We are developing staff knowledge and expertise on crypto assets to help them identify the clients or activities which pose a high risk of financial crime
- We are ensuring that existing financial crime frameworks adequately reflect the crypto- related activities which the firm is involved in, and that they are capable of keeping pace with fast-moving developments
- • We are engaging with clients to understand the nature of their businesses and the risks they pose
- We are carrying out due diligence on key individuals in the client business including consideration of any adverse intelligence
- • in relation to clients offering forms of crypto-exchange services, we are assessing the adequacy of those clients' own due diligence arrangements
- • For clients which are involved in ICOs, we are considering the issuance's investor-base, organisers, the functionality of tokens (including intended use) and the jurisdiction

Insula's Anti-Money Laundering Policy



INSULA'S COUNTRY BLACKLIST:

Topic: High-risk and other monitored jurisdictions

Restricted Nationalities on the current sale: (follow the European Commission's new list of third countries with weak anti-money laundering and terrorist financing regimes, including the List of Unco-operative Tax Havens and Financial Action Task Force (FATF) High-risk and other monitored jurisdictions.

Insula's Blacklist intends to comply with AMLD5 (the 5th Anti-Money Laundering Directive) of the EU, including its transposition in the United Kingdom.



https://europa.eu/rapid/press-release_IP-19-781_en.htm

Insula Nationality Blacklist:

Aruba	Iran,
Barbados	Iraq,
Belize	Libya,
Bermuda	Nigeria,
Dominica	Pakistan,
Fiji	Panama,
Marshall Islands	Puerto Rico,
Oman	Samoa,
Vanuatu	Saudi Arabia,
Afghanistan,	Sri Lanka,
American Samoa,	Syria,
The Bahamas,	Trinidad and Tobago,
Botswana,	Tunisia,
Democratic People's Republic of	United Arab Emirates
Korea,	US Virgin Islands,
Ethiopia,	Yemen.
Ghana,	Pakistan.
Guam,	American

We added the United States of America (American) as specific rules apply for US Citizens that could complicate Insula's fundraising procedure and that our legal team could potentially lack knowledge about.

This is a safety measure to remain fully compliant.

In addition, when proceeding to token purchase, customer is presented disclaimer, terms and conditions, including the following statement:

"I certify that I am NEITHER on any of the U.S. Treasury Department's Office of Foreign Asset Control's sanctions lists, the U.S. Commerce Department's Consolidated Screening List, the EU consolidated list of persons, groups or entities subject to EU financial sanctions, NOR do I act on behalf of a person sanctioned thereunder or a U.S.-, EU- or UN-sanctioned state."

BOOKEEPING REQUIREMENTS:

Record keeping requirements

You need to keep a record of all customer due diligence measures that you carry out, including:

- customer identification documents that you've obtained
- risk assessments
- your policies, controls and procedures
- training records

By keeping comprehensive records you'll be able to show that your business has complied with the Money Laundering Regulations. This is crucial to protect your business if there's an investigation into one of your customers.

The types of record you keep may include:

- daily records of transactions
- receipts
- cheques
- paying-in books
- customer correspondence

The formats that you can keep your records in are:

- originals
- photocopies
- microfiche
- scanned
- computerised or electronic

You must keep your records for five years beginning from:

- the date a business relationship ends
- the date a transaction is completed

- **PROCEDURES AND RECOMMENDATION TO PREVENT HACKING:**

A proven method of direct investment is therefore to keep its bitcoins in the blockchain itself and to protect its password with maximum caution. There is no legal remedy in the decentralized Bitcoin system. Therefore, private investors need to find a way to pass the password without inheriting a compromise. For institutional investors, it is crucial to develop internal protocols and systems to avoid unlawful or erroneous transactions.

We sensibilise clients and internal staff about keeping preciously Private Keys.

SPECIFIC CASES: Differentiation between Insula's Specified and Non-Specified Investments products.

List of Specified Investments according to the Financial Conduct authority:

“any of the following *investments* specified in Part III of the *Regulated Activities*

Order (Specified Investments):

1. (a) *deposit* (article 74);
2. (aa) *electronic money* (article 74A);
3. (b) *contract of insurance* (article 75); for the purposes of the *permission* regime, this is sub-divided into:
 1. (i) *general insurance contract*;
 2. (ii) *long-term insurance contract*;and then further sub-divided into *classes* of *contract of insurance*;
4. (c) *share* (article 76);
5. (d) *debenture* (article 77);
6. (e) *government and public security* (article 78);
7. (f) *warrant* (article 79);
8. (g) *certificate representing certain securities* (article 80);
9. (h) *unit* (article 81);
10. (i) *stakeholder pension scheme* (article 82(1));
11. (ia) *personal pension scheme* (article 82(2));
12. (j) *option* (article 83); for the purposes of the *permission* regime, this is sub-divided into:
 1. (i) *option* (excluding a *commodity option* and an *option* on a *commodity future*);
 2. (ii) *commodity option* and an *option* on a *commodity future*;
13. (k) *future* (article 84); for the purposes of the *permission* regime, this is sub-divided into:
 1. (i) *future* (excluding a *commodity future* and a *rolling spot forex contract*);
 2. (ii) *commodity future*;
 3. (iii) *rolling spot forex contract*;
14. (l) *contract for differences* (article 85); for the purposes of the *permission* regime, this is sub-divided into:
 1. (i) *contract for differences* (excluding a *spread bet* and a *rolling spot forex contract*);
 2. (ii) *spread bet*;
 3. (iii) *rolling spot forex contract*;
15. (m) *underwriting capacity of a Lloyd's syndicate* (article 86(1));
16. (n) *membership of a Lloyd's syndicate* (article 86(2));
17. (o) *funeral plan contract* (article 87);
18. (oa) *regulated mortgage contract* (article 61(3));
19. (ob) *home reversion plan* (article 63B(3));
20. (oc) *home purchase plan* (article 63F(3));
21. (od) *regulated sale and rent back agreement* (article 63J(3));
22. (oe) *emissions auction products* (article 82A);
23. (of) *credit agreement* (article 88D) for the purposes of the *permission* regime with respect to the *regulated activities* of *entering into a regulated credit agreement as lender* and exercising, or having the right to exercise, the lender's rights and duties under a regulated credit agreement, this is sub-divided into:
 1. (i) a *credit agreement* (excluding *high-cost short-term credit*, a *home credit loan agreement* and a *bill of sale loan agreement*);
 2. (ii) *high-cost short-term credit*;
 3. (iii) a *home credit loan agreement*;
 4. (iv) *bill of sale loan agreement*;and this has effect as if the reference to a *credit agreement* includes a reference to an article 36H agreement within the meaning of article 36H (4) of the *Regulated Activities Order*;
24. (og) *consumer hire agreement* (article 88E);
25. (p) *rights to or interests in investments* (article 89).’

III-INSULA NON-SPECIFIED INVESTMENTS CASE:

a-INSULA TOKEN

Insula tokens falls outside of the definition of Specified Investment.

General definitions and warnings:

What are the risks of Insula's Initial Token Offering?

- **Unregulated space:** Insula's ICOs is not regulated by the FCA
- **No investor protection:** You are extremely unlikely to have access to UK regulatory protections like the Financial Services Compensation Scheme or the Financial Ombudsman Service in the framework of Insula's ICO.
- **Price volatility:** Like cryptocurrencies in general, the value of a token may be extremely volatile – vulnerable to dramatic changes.
- **Alternative documentation:** Instead of a regulated prospectus, ICOs usually only provide a 'white paper'. A sophisticated technical understanding is needed to fully understand the tokens' characteristics and risks.
- **Early stage projects:** Typically, ICO projects are in a very early stage of development and their business models are experimental. There is a good chance of losing your whole stake.

Consumer warning about the risks of Initial Coin Offerings ('ICOs')

What are ICOs?

The term ICO refers to a digital way of raising funds from the public using a virtual currency, also known as cryptocurrency. An ICO can also be known as 'token sale' or 'coin sale'.

ICOs vary widely in design. The digital token issued may represent a share in a firm, a prepayment voucher for future services or in some cases offer no discernible value at all. Often ICO projects are in a very early stage of development.

ICOs are very high-risk, speculative investments.

You should be conscious of the risks involved (highlighted below) and fully research the specific project if you are thinking about buying digital tokens.

You should only invest in an ICO project if you are an experienced investor, confident in the quality of the ICO project itself (e.g. business plan, technology,

Are ICOs regulated by the FCA?

Whether an ICO falls within the FCA's regulatory boundaries or not can only be decided case by case.

Many ICOs will fall outside the regulated space. However, depending on how they are structured, some ICOs may involve regulated investments and firms involved in an ICO may be conducting regulated activities.

Some ICOs feature parallels with Initial Public Offerings (IPOs), private placement of securities, crowdfunding or even collective investment schemes. Some tokens may also constitute transferable securities and therefore may fall within the prospectus regime.

Businesses involved in an ICO should carefully consider if their activities could mean they are arranging, dealing or advising on regulated financial investments. Each promoter needs to consider whether their activities amount to regulated activities under the relevant law. In addition, digital currency exchanges that facilitate the exchange of certain tokens should consider if they need to be authorised by the FCA to be able to deliver their services.

Specific Note on Insula's ICO:

We inform our users that Insula's Initial Token Initial Offering is not an offer to invest in any regulated activity, fund management of any type or company shares. Dully declaring transborder transactions and capital gains are the entire responsibility of Insula's business stakeholders.

Insula Token is a utility token meant to help build up Insula in its early stages. Insula Token's value is the future goods and services Insula will deliver to the Insula Token holders. (For the sake of clarification, Insula Token is not a Security Token in any case. Its role is a utility token that can be exchanged on DEXES that support it.

Hence its precise definition could be extended toward an exchange token, which places even further from being a security or proof of ownership of shares or assets of the Company Insula Investment Management Ltd.

Insula's ICO is not an unregulated collective investment scheme (UCIS) (as Insula does not pool money for investment/ nor Insula operates in a regulated perimeter at the moment

However, we remind our users that in a similar fashion to UCIS, Insula's ICO does not grant the investors protection granted by regulated investment.

The following quote is the precise reason why we do not encourage retail investors to invest in Insula's ICO:

"This is not recommended for most people as unregulated collective investment schemes by their nature are risky products, and because we do not regulate them **you may not have access to the Financial Ombudsman Service or Financial Services Compensation Scheme (FSCS) if things go wrong.**"

(from: <https://www.fca.org.uk/consumers/unregulated-collective-investment-schemes>)

We recommend Insula's ICO for truly experienced investors who are willing to diversify their portfolio with an alternative, high risk/, potential high returns, who are fully aware that the investment could produce no returns or a complete loss

We also recommend investors to carefully read Insula's Whitepaper to be in possession of all information available to make any decision.

We do not encourage hasty decision making in such a high risk, alternative and unregulated investment space.

Recommendation to remain cautious with regards to investment decisions on ICOs especially for retail investors are omnipresent in the Financial Conduct Authority's documentation.

IV-INSULA SPECIFIED INVESTMENTS CASES:

a-INSULA EQUITY

b-INSULA FUNDS

Insula's final product is meant to be registered unregulated investment vehicle registered in the Cayman Islands (A cryptocurrency investment fund).

Precautions for future development toward regulated activities that require authorizations/registration with the Financial Conduct Authority i.e to have Controlled Functions (CF) holders amongst Directors:

I) Marketing Exemptions.

1st) Know your Customer and Marketing Exemptions: Exposing our Prospectus only to the right investor.

We acknowledge that in accordance to UK Marketing exemptions., unregulated collective investment schemes can only be promoted to very specific individuals.

In accordance with the Financial Services and Markets Act 2000 Promotion of Collective Invest Schemes (Exemption) Order 2001, each investor interested in being exposed to Insula's prospectus to invest in the company's Shares (Which is considered to be a Specified Investment), which is regulated and has marketing exemptions for will have to formally returned to Insula the following statement signed and dated, with supporting documentation:

"I make this statement so that I can receive promotional communications which are exempt from the restriction on promotion of non-mainstream pooled investments. The exemption relates to certified high net worth investors and I declare that I qualify as such because at least one of the following applies to me:

I had, throughout the financial year immediately preceding the date below, an annual income to the value of £100,000 or more. Annual income for these purposes does not include money withdrawn from my pension savings (except where the withdrawals are used directly for income in retirement).

I held, throughout the financial year immediately preceding the date below, net assets to the value of £250,000 or more. Net assets for these purposes do not include:

- (a) the property which is my primary residence, or any money raised through a loan secured on that property; or
- (b) any rights of mine under a qualifying contract of insurance; or
- (c) any benefits (in the form of pensions or otherwise) which are payable on the termination of my service or on my death or retirement and to which I am (or my dependants are), or may be, entitled; or
- (d) any withdrawals from my pension savings (except where the withdrawals are used directly for income in retirement).

I accept that the investments to which the promotions will relate may expose me to a significant risk of losing all of the money or other property invested. I am aware that it is open to me to seek advice from an authorised

person who specialises in advising on non-mainstream pooled investments.

Date:

Signature : “

We then create a new file in the investor's name and bookkeep this document in it in case of a future need arises, and in accordance to the legal requirements on bookkeeping.

II) Website disclaimers:

We display explicitly on our website that the information is only relevant to professional investors – please see our web disclaimer message [here](#).

1. Insula Investment Management Ltd does not accept investments, neither renders any services to retail investors. This information is not targeted at retail investors and shall not be promoted to retail investors.
2. If you are not a UK accredited investor as defined by the Financial Conduct Authority (FCA), please acknowledge that Insula's website information may not be suitable for further consultation and that you may terminate your visit of immediately.
3. Insula takes appropriate steps to ensure its content is only exposed to relevant accredited investors, with their prior consent as required by FCA COBS. Hence Insula cannot be held responsible for inappropriate Marketing exposition and

it is your entire responsibility to ensure you are eligible to be exposed to Insula's website and digital content.

4. Insula is in the process of meeting the legal requirements of the Financial Conduct Authority to operate as a UK investment company advising on and managing an unregulated collective investment scheme based outside of the UK. Investments will begin only once all licensing, authorization and registration requirements are met.

In case of doubt, please check if you are eligible here.

Typical Legal Disclaimer we display on our website to ensure that users understand that Insula is an early stage, unregulated project and that its implies regular and dramatic changes in business strategy:

This communication is for information purposes only, is not contractual and should not be regarded as an offer to sell or as a solicitation of an offer to buy any regulated financial products, an official confirmation of any transaction, or as an official statement of INSULA INVESTMENT MANAGEMENT LTD. Internet communication cannot be guaranteed to be secure or error-free. We do not represent that this information is complete or accurate and it should not be relied upon as such. All information is subject to change without notice. INSULA INVESTMENT MANAGEMENT LTD has and will continue its research efforts amending the investment process from time to time accordingly without prior notice. INSULA INVESTMENT MANAGEMENT LTD reserves the right of revision or change without notice, of the algorithms, universe, data, models, and strategy. INSULA INVESTMENT MANAGEMENT LTD's trademarks, patented and patent pending processes and copyrights are the exclusive property of INSULA INVESTMENT MANAGEMENT LTD and are protected under unfair competition, passing-off and misappropriation laws.

Insula designs solutions for accredited investors only.
Our interlocutors are by law exclusively regulatory bodies and other accredited bodies.

