



GLASS LEWIS

Anti-Money Laundering and Office of Foreign Assets Control (OFAC) Policy

The U.S. Department of the Treasury Office of Foreign Assets Control (OFAC) administers and enforces economic and trade sanctions based on U.S. foreign policy and national security goals against targeted countries, terrorists, international narcotics traffickers, and those engaged in activities related to the proliferation of weapons of mass destruction. OFAC acts under U.S. Presidential wartime and national emergency powers, as well as authority granted by specific legislation, to impose controls on transactions and freeze non-U.S. assets under U.S. jurisdiction. Many of the sanctions are based on United Nations and other international mandates, are multilateral in scope, and involve close cooperation with allied governments. OFAC regulations require financial institutions to take certain actions to prevent prohibited transactions and to address potentially prohibited transactions when identified.

Glass Lewis will not knowingly engage in financial transactions that involve proceeds from unlawful activity or that support terrorist activities (commonly referred to as “money laundering” or “terrorist financing” respectively). Additionally, Glass Lewis will not engage in financial transactions with individuals, entities and restricted countries designated by The U.S. Department of the Treasury Office of Foreign Assets Control (OFAC) or similar sanctions regulations in other countries where Glass Lewis does business.

Glass Lewis will file government reports, including those concerning suspicious activities, as required by applicable law.

For any questions or concerns regarding this policy, or to report any suspected or actual violations of this policy, please email compliance@glasslewis.com.