



# Anti-Money Laundering and Sanctions Policy

## Introduction

Glass Lewis is firmly committed to participating in and complying with international efforts to combat money laundering, as well as to deter a range of activities, such as political or military aggression, providing sanctuary for criminals and terrorists, developing nuclear or other weapons programs, and abusing human rights.

Any failure to comply with this policy can expose Glass Lewis to significant reputational damage, legal and regulatory actions, as well as financial loss. Therefore, anyone acting for, or on behalf of, Glass Lewis, including, but not limited to, Glass Lewis' officers, directors, employees, and agents, are required to fully comply with this policy at all times. Violating this policy may result in disciplinary action by Glass Lewis, in addition to substantial fines and imprisonment.

## Anti-Money Laundering

Glass Lewis will not conduct business with individuals or corporations whose conduct may give risk to suspicions of involvement with illegal activities. This includes knowingly engaging in financial transactions that involve proceeds from unlawful activity or that support terrorist activities (commonly referred to as "money laundering"). For the purposes of this policy, the following conducts shall be regarded as money laundering:

- The conversion or transfer of property, knowing that such property is derived from criminal activity or from an act of participation in such activity, for the purpose of concealing or disguising the illicit origin of the property or of assisting any person who is involved in the commission of such an activity to evade the legal consequences of that person's action.
- The concealment or disguise of the true nature, source, location, disposition, movement, rights with respect to, or ownership of, property, knowing that such property is derived from criminal activity or from an act of participation in such activity.
- The acquisition, possession or use of property, knowing, at the time of receipt, that such property was derived from criminal activity or from an act of participation in such activity.
- Participation in, association to commit, attempts to commit and aiding, abetting, facilitating and counselling the commission of any of the above-mentioned actions.



## Sanctions Compliance

Glass Lewis complies with the sanctions administered and enforced by the Office of Foreign Assets Control of the U.S. Department of the Treasury (“OFAC”), as well as with any applicable sanctions and restrictive measures which may apply across the EU, the United Kingdom and in any other countries in which Glass Lewis operates. Therefore, neither Glass Lewis nor as anyone acting for, or on behalf of, Glass Lewis, will engage in any commercial relationship or financial transaction with a sanctioned individual, a sanctioned entity, and/or a restricted country.

## Reporting a Suspicious Activity or Concern

There are several ways to report a suspicious activity, or raise a concern. Reporting can be done anytime 24/7, by either sending an email to [compliance@glasslewis.com](mailto:compliance@glasslewis.com), or by calling +1-415-906-3872 and leaving a voicemail. Glass Lewis strictly prohibits intimidation or retaliation against anyone who shares a suspicious activity, in good faith, or assists with an investigation or inquiry.

## Reporting and Co-operation

Glass Lewis agrees to carefully assess any reports it receives and, if required, will contact relevant regulatory and law enforcement authorities. Moreover, Glass Lewis is committed to and will co-operate with any lawful request for information made by government or law enforcement agencies during their investigations of any such reported activities.

## Questions

Any questions regarding this policy should be directed to the Vice President of Compliance or the Chief Legal Officer by sending an email to [compliance@glasslewis.com](mailto:compliance@glasslewis.com).