



Cooley LLP AML Policy

To comply with applicable anti-money laundering, counter-terrorism financing, embargo, trade sanctions, and similar laws, rules, regulations, or policies, a Cooley Entity, as defined in the Engagement Agreement, may need to verify the identity of (i) the Client or prospective client; (ii) the instructing individual acting on the Client's behalf; and (iii) the Client's beneficial owners. We may also need to verify the legitimacy of the Client's wealth (i.e., how its assets were acquired) and the source of funds being used in the transaction (i.e., how and from where the money for the transaction was obtained).

To satisfy these obligations, and at our request, the Client may be required to provide documentation and other information, including copies of passports/drivers' licenses, company formation documentation, and dates of birth of company directors. We may need to run credit checks and search external identity verification providers and other databases.

Any data collected in connection with this Policy will be processed only for the purpose of complying with our legal obligations, including to prevent money laundering and terrorist financing, unless permitted by applicable law, regulation, or ethical rules.

In certain circumstances, we may be required by law to disclose suspicions of money laundering, prohibited transactions, or certain other activities to the relevant regulatory authorities without the Client's consent.

If we are unable to satisfy our regulatory obligations within a reasonable period of time, we must withdraw from representing the Client. In such circumstances, the Client will nevertheless be responsible for the fees, expenses and disbursements incurred up to the date of our withdrawal of representation.

We are not responsible for any losses or costs flowing directly or indirectly from our compliance with these duties.

The Client agrees to cooperate with us in satisfying these obligations.