



LGO’S GLOBAL AML, KYC, & CTF POLICY STATEMENT

LGO is committed to maintaining the integrity of the global financial marketplace and establishing an enterprise-wide culture of compliance in line with all laws, rules, and regulations applicable to its operations.

As an international organization with offices in the United States and France, LGO must comply with the mandates of these jurisdictions regarding anti-money laundering (“*AML*”), counter-terrorism financing (“*CTF*”), and prescribed sanctions lists.

It is the policy of the Company to maintain the highest level of compliance with these obligations, which require a robust internal framework that details how the Company plans to comply. This includes procedures for client due diligence (“*KYC*”), monitoring for suspicious activity, reporting and recordkeeping, and employee training.

Written AML Program

It is the policy of the Company to adopt the highest level of standards in the industry for preventing the laundering of illicit funds, the financing of terrorist activities, and sanctions lists violations. This is done through implementation of a written AML compliance program that is approved by the Board, regularly audited, and covered in employee training.

LGO’s AML Program includes policies, procedures, and internal controls designed to prevent it from being used to facilitate any illegal activities. Policies are the principles guiding the Company’s compliance and risk mitigation efforts. Procedures provide the step-by-step actions required to effectively implement the policies. Internal controls define the process for assuring of the Program’s effectiveness, efficiency, and continuity.

Designated Compliance Officers

The Company’s AML compliance program is directed by designated compliance officers who will be responsible for the day-to-day implementation of the Program and who will ensure it is updated to reflect any pertinent changes to laws and regulations.

Risk-Based Approach

The written AML Program is established and amended as needed based on the specific risks facing the Company. It is the policy of the Company to perform regular risk assessments no less than annually and make any necessary changes to its Program in order to effectively abate perceived risks with respect to money laundering and other illegal conduct.

Account Opening and Client Due Diligence

KYC can be defined as “what businesses do in order to verify the identity of their clients either before or during the time that they start doing business with them.” KYC checks are necessary to ensure that LGO only transacts with reputable individuals, as well as to meet the many statutory, organizational, and operational requirements of the business.

LGO’s Customer Identification Program (“*CIP*”) ensures its clients are not sanctioned parties and the LGO Services are not used to further any illegal transactions. It is the policy of the Company to verify and authenticate the identity of anyone wishing to enter into a business relationship with the Company. Potential clients are screened to ensure they do not appear on the OFAC or any other government watchlist applicable to LGO’s operations as part of initial onboarding and continuously throughout the relationship.

Monitoring and Reporting

It is the policy of the Company to have procedures in place to monitor client transactions and detect any suspicious or unusual activity. A suspicious transaction is often one that is inconsistent with a customer’s known and legitimate business, personal activities or personal means. LGO leverages its compliance department to review any such activity and determine if a regulatory filing is necessary.

Recordkeeping

LGO complies with all applicable reporting, recordkeeping, and record retention requirements. It is the policy of the Company to maintain all records and documentation related to its AML Program for no less than five (5) years.

Confidentiality

It is the general policy of the Company to not share confidential client information except to the extent required by our legal, regulatory, or contractual obligations or to which we have express consent. LGO will not share any client information except as described in the AML Program and further provided for in LGO’s Privacy Policy.

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