

ANTI-MONEY LAUNDERING & ANTI-BRIBERY

It is the policy of St. George's Group to enter into client relationships with reputable individuals. We will not knowingly assist in the contravention of the laws and regulations of any country, nor will we accept any business, the nature of which would, or might, for any reason, call into question the integrity of the Group or the jurisdictions in which we operate. It is our legal and regulatory obligation to "know our client", and this will help to ensure that our clients enjoy the advantages of a reputable service provider.

In accordance with our obligations under the laws of Bermuda and/or the Cayman Islands (as applicable), every prospective customer as well as certain other individuals and entities associated with a given structure will be required to provide in advance of the commencement of the business relationship a number of customer due diligence documents. We understand that such information may be sensitive and we undertake to hold same in confidence. Once established, trusts and companies under the administration of our Group are subject to ongoing monitoring obligations, which may require us to request updated information and/or documentation from you from time to time.

Bribery is the offering, giving, receiving or soliciting of something of value for the purpose of influencing the actions of another person. A bribe can consist of an immediate cash payment, a promise of later payment, services or anything else that the recipient views as valuable. In accordance with our legal and regulatory obligations, St. George's Group has an anti-bribery policy which prohibits, amongst other things, the making, offering or promising to make a payment or provide a service for any improper purpose or business advantage. This policy applies to dealings with our clients, as well dealings with third parties on behalf of our clients.

COMPLAINTS

St. George's Group strives to provide each of our trust and corporate services clients high quality, personalised service. In the event you wish to express dissatisfaction with the service received, or to make a formal complaint, please submit your concerns in writing to our President, Kevin Gunther. Upon receiving information regarding your issue, we will make every effort to bring a satisfactory resolution to your complaint within a reasonable time period.

CONFLICTS OF INTEREST

St. George's Group acknowledges that, although unlikely, there are circumstances in which a conflict of interest could arise in connection with the provision of our services. The types of conflicts that might arise are those in which there is (a) a conflict between your interests and the interests of our Group, and/or (b) a conflict between your interests and the interests of another one of our clients. In the event that such a conflict of interest might arise, it shall be the responsibility of the senior management team of St. George's Group to disclose the conflict to you, obtain your

consent for the continued provision of services to you, and undertake such measures as may be appropriate in the particular circumstances to manage the conflict and mitigate any risks which might be associated therewith.

In the event you feel that a conflict of interest has not been managed to your satisfaction, please refer to our complaints procedure.