



FINANCIERE PRIVEE JEAN DE MONTPELLIER & CIE LIMITED

Global Anti-Money Laundering Policy

Money laundering refers to those acts, such as criminals make proceeds derived from crimes clean money by disguising and/or concealing actual source and/or destination of proceeds. Terrorist financing refers to those acts, such as terrorist groups, etc. provide funds for terrorism activities through financial institution. (hereinafter collectively referred to as "money laundering, etc. ") In recent years, we have noted increasingly sophisticated combinations of criminal skills, and have taken into consideration the importance of the measures against financing of terrorism based on the international community's determination to combat terrorism and terrorist activities. Hereby we restate this written policy for anti-money laundering in order that funds are not channeled for criminal activities.

If money laundering is left untouched, those gains derived from such activity will be allowed to finance future crimes. Furthermore, not only will it increase organized crime such as financing to keep and/or enlarge criminal organizations, but it also might mean that criminal organizations will be able to exert an influence over legitimate economic activities.

We must take all measures to stop the flow of funds for terrorism and terrorist activities, as if it is unchecked it will be a serious threat to the international community.

Consequently, the major countermeasure against money laundering and financing of terrorism is for financial institutions to cooperate. For that purpose, everyone in the organization from management to employees must make every possible effort to prevent money laundering, etc.

As a global financial institution, FINANCIERE PRIVEE JEAN DE MONTPELLIER & CIE LIMITED recognizes the importance of countermeasures against money laundering, etc. In order to respond to calls made by the international community to fight money laundering, we will conduct business in compliance with our internal control system.

Management

We clearly prescribe roles within us for anti-money laundering, etc.

Customer Identification

- We implement and maintain appropriate measures to conduct customer identification
- Management will train employees in matters related to the prevention of money laundering so that employees can implement immediate and appropriate measures for customer identification.

Confirmation of measures for freezing assets

- We implement and maintain measures to confirm assets which are or are to be frozen in relation to terrorist activities
- We train employees in matters related to the prevention of money laundering, etc. so that employees can implement immediate and appropriate measures for confirming assets frozen or to be frozen in relation to terrorist activities.

Reporting of suspicious transactions, etc.

- We implement and maintain measures for handling suspicious transactions
- We report suspicious transactions to relevant authorities without delay
- We take appropriate actions against suspicious transactions without delay
- We train employees in matters related to the prevention of money laundering, etc. so that employees can take appropriate actions in a timely manner for handling suspicious transactions.

Check and Monitoring

We check and monitor whether we are compliant with regulations for anti-money laundering, etc. and continuously improve our system based on the results.

