

Moelis

Moelis & Company

Anti-Money Laundering Policy Statement

Moelis & Company (together its subsidiaries, “Moelis” or the “Company”) is committed to complying with all applicable anti-money laundering (“AML”) laws and regulations and to taking appropriate measures to prevent, detect and report known and suspected money laundering and terrorist financing. Moelis’ AML Program applies to all officers, registered representatives and employees of the Company in addition to any temporary employees, interns, consultants, and independent contractors providing services to the Company (referred to herein for the purposes of this AML Policy Statement as “representatives”). Moelis has a legal and ethical obligation to combat money laundering and terrorist financing. The Company conducts due diligence consistent with regulations on its clients and on its third-party vendors and suppliers and expects them to be in compliance with all applicable AML laws and regulations. Moelis reserves the right to terminate any business relationship that violates any applicable AML regulation or the Company’s related internal policies.

The Company’s AML Program includes: 1) designation of an AML Compliance Officer; 2) internal policies and controls (including Client Identification Procedures to ensure appropriate due diligence of clients); 3) a risk assessment framework; 4) record keeping and reporting requirements (including suspicious activity reports); 5) ongoing monitoring and sanctions screening; 6) independent testing; and 7) an employee training program.

All Moelis representatives are required to act in compliance with all applicable AML laws, regulations, sanctions programs, and lists, and adhere to Moelis’ AML policies and procedures. Non-compliance with any applicable AML laws and regulations and/or violation of Moelis’ related internal policies will result in disciplinary action.