



D. BORAL CAPITAL'S AML PROGRAM STATEMENT

D. Boral Capital's leadership and staff are fully committed to complying with the BSA¹, the USA PATRIOT Act², related FINRA³ rules, other applicable United States' anti-financial crime rules and regulations, as well as the economic sanctions and embargoes administered by the U.S. Department of the Treasury's OFAC⁴.

Pursuant to this commitment, D. Boral Capital has developed and implemented a risk-based BSA/AML⁵/CFT⁶/CPF⁷ and OFAC Sanctions Compliance Program (AML Program) designed to maintain an efficient and sustainable risk-and-control environment. With the help of our AML Program, we are supporting our regulators and law enforcement agencies in their efforts to safeguard the U.S. and international financial systems by combatting money laundering, financing of terrorism, proliferation financing, bribery and corruption, sanctions evasion, and other illicit finance threats.

¹ Bank Secrecy Act

² Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act

³ Financial Industry Regulatory Authority

⁴ Office of Foreign Assets Control

⁵ Anti-money laundering

⁶ Countering financing of terrorism

⁷ Countering proliferation financing