



# USA Patriot Act

The USA PATRIOT Act, enacted in 2001, is designed to detect, deter, and punish terrorists in the United States and abroad. The USA PATRIOT Act imposes new antimoney laundering requirements on brokerage firms and financial institutions. By April 24, 2002, all brokerage firms were required to have new, comprehensive anti-money laundering programs.

To help you understand these efforts, we want to provide you with some information about money laundering and our steps to implement the USA PATRIOT Act.

## What is money laundering?

Money laundering is the process of disguising illegally obtained money so that the funds appear to come from legitimate sources or activities. Money laundering occurs in connection with a wide variety of crimes, including illegal arms sales, drug trafficking, robbery, fraud, racketeering, and terrorism.

## How big is the problem and why is it important?

The use of the U.S. financial system by criminals to facilitate terrorism or other crimes could well taint our financial markets. It is suspected that worldwide money laundering activity amounts to billions each year.

## Our Commitment

VectorGlobal WMG, Inc, (“VectorGlobal”) is committed to complying fully with all applicable laws and regulations relating to combating money laundering and any activity which facilitates the funding of terrorist or other criminal enterprises.

## Our Anti-Money Laundering Policies and Procedures

VectorGlobal has adopted policies and procedures to detect and prevent money laundering, which are summarized below:



- VectorGlobal has established comprehensive anti-money laundering programs that meet applicable rules and regulations in the jurisdictions where it conducts business.
- VectorGlobal has appointed money laundering compliance officers to oversee the Firm's anti- money laundering efforts.
- VectorGlobal utilizes automated systems provided through its clearing broker to monitor transactions within the Firm for suspicious activity.
- VectorGlobal has established a program to train all its relevant employees in the Firm's anti- money laundering policies and procedures.
- The Firm also trains all relevant employees in how to detect money laundering and to report any suspicious activity.
- VectorGlobal has established an independent audit function to evaluate the Firm's antimoney laundering program.

## **Our Customer Identification Procedures for New Accounts**

Government rules adopted to prevent money laundering and terrorist financing require all U.S. financial institutions to obtain, record, and verify information that identifies each individual or entity that opens an account.

When you open an account with or through VectorGlobal , we will ask you for your name and

address. We will also ask for an identification number. For U.S. individuals, this means a taxpayer identification number such as your social security number. For U.S. entities, it means your employer identification number. For non-U.S. individuals, you must supply a passport or other government-issued photo identification document. For non-U.S. entities, it means a taxpayer identification number.

In addition, you may be required to provide identification documents as necessary to enable the Firm to verify your identity. VectorGlobal may also screen your name against various databases to verify your identity. All information and documentation will be treated in a manner so as to protect your privacy.

VectorGlobal is required to verify the identity of its customers. In certain circumstances we may not be able to open an account or conduct any transactions for you until we have obtained and verified the necessary identification information.

If we have opened an account for you, we may have to restrict trading or close it if you do not supply the necessary information or documents or if we are unable to verify your identity.

Sincerely,

VectorGlobal WMG