

Renaissance Capital's Anti-Money Laundering Policy

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

- We have established comprehensive anti-money laundering programs that meet applicable rules and regulations in the jurisdictions where it conducts business
- We have appointed money laundering compliance officers to oversee the Firm's anti-money laundering efforts
- We monitor transactions within the Firm for suspicious activity
- We have established a program to train our 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
- We evaluate the Firm's anti-money laundering program on an annual basis

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 us, 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. We 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.

We are required to verify the identity of our 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.

Dated: November 24, 2014