

Moelis Australia Group Privacy Policy and Client Statement

Introduction

This policy applies to personal information collected by Moelis Australia Holdings Pty Ltd and all of its wholly-owned subsidiaries, together referred to in this Policy as “Moelis”, “us”, “our” or “we”. It outlines how Moelis collects and uses your personal information in accordance with the Privacy Act 1988 and the Australian Privacy Principles.

What information do we collect?

Moelis will collect and hold your personal information for the purposes of:

- Providing products and services to you
- Managing and administering the products and services
- Letting you know about our other products and services

The type of information collected from you includes information necessary to operate your account or for us to provide financial services to you. We may ask you to provide personal information such as:

- name
- email address
- residential and/or postal address
- date of birth
- contact details
- bank account details
- financial details

How personal information is collected?

The personal information we collect about you comes primarily from your account application forms, engagement letters or other product forms and through our ongoing communications with you. Moelis may collect information about you in addition to what you voluntarily provide to us in order to comply with the relevant laws and regulations. Wherever there is a legal requirement for us to ask for information about you, we will inform you of the obligation and the consequences of not giving us the requested information. For example, in addition to obtaining personal information from

you when you acquire a new product or service from us, we will need to obtain certain documentary evidence from you as to your identity. Such evidence may include items such as a certified copy of your driver's licence, passport or birth certificate.

We will not collect any personal information about you except where you have knowingly provided that information to us or we believe you have authorised a third party to provide that information to us. Any information collected from publically available sources will be treated in the same way as the information you voluntarily disclose with strict confidence.

How do we use and disclose your personal information?

We only use and hold your personal information for purpose of providing you with the financial service or products you have sought from us or for any other matters that are directly related with that purpose that you would reasonably expect.

The types of external organizations to which we often disclose your personal information include:

- any organizations involved in providing, managing or administering our products or services such as settlement agents, custodians or external dispute resolution services;
- your financial adviser;
- any fund administrator and custodian where you have invested in one of our funds;
- any financial institution who holds an account for you;
- any professional advisers appointed by us;
- businesses that may have referred you to us; and
- other Moelis associated entities located globally.

Like other financial services companies, there are situations where we may also disclose your personal information where it is:

- required by law (such as to the Australian Securities and Investments Commission or AUSTRAC)
- required by the relevant operating exchange such as ASX or Chi-X under the respective market operating rules and that information may be used by the market for its purposes (for example, in the course of compliance activities)
- authorised by law (such as where we are obliged to disclose information in the public interest or to protect our interests)
- necessary in discharging obligations (such as to foreign governments for the purposes of foreign taxation)
- required to assist in law enforcement (such as to a police force).

Security of Collected Information

We endeavor and use reasonable efforts to maintain physical, electronic, and administrative safeguards to protect your personal information from misuse, interference, loss and unauthorized access, modification or disclosure. We restrict access to information about you to those Moelis personnel on the need-to-know basis for purpose of provision of service you have engaged us for.

Although Moelis endeavors to take steps to provide a secure environment to hold your personal information, there is no guarantee that the electronic information about you stored on the internet is totally secure due to the nature of the internet. However, once we detect any unauthorized access or any kind of potential abuse, we will notify you and at the same time take the appropriate remedial steps as early as practicably possible.

Once your relationship with Moelis comes to an end and the service you have sought from us has been provided and completed or upon your request, Moelis will destroy your personal information physically and electronically or de-identify your personal information unless it is contained in a Commonwealth record or Moelis is required or authorized by an Australian law or a court or tribunal order to retain such information. For instance, your transaction records will be retained for a certain period of time after the transaction completes during which you may have already ceased to be our client.

Destruction of your personal information will be irretrievable. Depending on how we hold your information, paper records containing your personal information will be shredded before it is recycled. If is in the electronic form, the way we destroy your personal information will vary depending on the kinds of hardware used to store the personal information. It includes sanitizing the hardware to completely remove the stored information. For hardware that cannot be sanitized, we may instead de-identify your personal information or put the information beyond use.

If your information is stored in the cloud storage of our third party vendors, we will notify our vendor promptly to destroy or de-identify your personal information in the same or significant similar way.

Cookies

A "cookie" is a small text file that may be placed on a computer by a web server. Our websites may use cookies which may enable us to identify you or your browser while you are using our site. These cookies may be permanently stored on a computer or are temporary session cookies. They are used for a variety of purposes, including security and personalisation of services. They are frequently used on websites and you can choose if and how a cookie will be accepted by configuring your preferences and options in your browser.

All browsers allow you to be notified when you receive a cookie and you may elect to either accept it or not. If you wish not to accept a cookie, this may impact the effectiveness of the website. Your internet service provider or other IT service provider should be able to assist you with setting your preferences.

Cross-Border Disclosure

Depending on the type of service or product we provide to you, your personal information may be disclosed to our associated entities, contractors and unaffiliated service providers located in other overseas jurisdictions such as U.S, Europe, the Asia Pacific region (including, but not limited to China, Hong Kong and Singapore). The overseas jurisdictions that your personal information is subject to cross border disclosure may change from time to time.

Where Moelis discloses your personal information to an overseas recipient, Moelis will take steps to ensure the overseas recipient does not breach the obligations outlined in the Privacy Policy, however Moelis may be unable to ensure the overseas recipient does not breach the Australian Privacy Principles in relation to your information.

This may mean for information sent overseas you do not have the protections of, or any redress under, the Privacy Act. The overseas recipient may not be subject to privacy obligations equivalent to those under the Privacy Act and could be compelled by foreign law to make disclosure of the information. By using Moelis services you consent to Moelis making the disclosure to overseas recipients on this basis. We may also disclose your personal information when such disclosure of the information is required or authorized by or under an Australian law or a court/tribunal order.

Access to and Correction of Personal Information

We will give you access to your personal information within a reasonable time period in a manner requested by you. We may charge a reasonable fee to cover our costs. We may decline the access in the exceptional circumstances that are permitted under the Privacy Act. If this is the case we will inform you and explain the reasons why.

We will take reasonable steps to ensure that the personal information we collect, hold, use or disclose is accurate, complete, up to date, relevant and not misleading.

Reasonable steps that we may take include updating your personal information from public sources such as a telephone directory.

Please be aware that you are also responsible to notify us of any incorrect personal information we may hold as promptly as possible.

We will respond to your request to correct your personal information we hold within 30 calendar days after the request is made. There will be no charge for the making of

request. We may refuse to correct your personal information we hold about you if we do not agree with the corrections you have supplied. When we refuse your request, we will give you a written notice to that effect and an information statement if requested.

Complaints Handling

If you believe that we have mishandled your personal information, you may lodge a complaint with our Privacy Officer in writing, by mail or fax to the address or fax number set out at the end of this Policy. The Privacy Officer will acknowledge the receipt of your complaint as promptly as possible after we receive your complaint. We will endeavor to investigate and resolve your complaint within 30 calendar days. If we are unable to resolve your complaint, you can lodge a complaint with the Australian Information Commissioner by:

- Submitting an online form through the Information Commissioner's website: www.oaic.gov.au
- Submitting a hard copy form which can be obtained at http://www.oaic.gov.au/images/documents/privacy/privacy-complaints/making-a-privacy-complaint/Privacy_Complaint_Form.docx
- fax to 02 9284 9666
- email at enquiries@oaic.gov.au

Changes to This Policy

This Policy is subject to change from time to time as Moelis considers necessary. We will publish material changes by making them available on our website.

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