

# **Paramount Group Anti-Money Laundering (AML) Policy**

Paramount Group, Inc. (“*PGRE*”, and together with its subsidiaries and controlled affiliates, “*Paramount*”) is committed to preventing the misuse of its personnel and/or facilities by persons (including clients, counterparties and service providers) who seek to engage in money laundering. Accordingly, Paramount has adopted a *Paramount Group Anti-Money Laundering Policy* which includes various procedures designed to prevent, detect and provide for the reporting of money laundering. This policy applies to all Paramount companies, including but not limited to our registered investment advisory affiliates and all investment funds advised by them. Among other things, the policy includes “know your customer” (KYC) diligence requirements for investors (and potential investors) in our private investment funds.

PGRE encourages all of its personnel to be vigilant against money laundering and other illegal activities.

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The specific terms of the policies and procedures are confidential. Any questions concerning them should be directed to any member of the Paramount legal department.

*Summary last revised February 4, 2019.*