

THE LEHMAN ANTI-MONEY LAUNDERING PROGRAM

LEHMAN Capital LIMITED

Lehman is committed to combating money laundering, terrorist financing, securities fraud and other financial crimes (collectively "money laundering") and complying fully with all applicable laws and regulations relating to combating money laundering. Lehman is also committed to complying with economic and trade sanctions administered and enforced by governments and supranational bodies, including, among others, the sanctions programs and designated sanctions lists administered by the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"), the United Nations Security Council, the European Union and Her Majesty's Treasury. Compliance with all applicable anti-money laundering laws and regulations and sanctions programs and lists (collectively, "AML") is strictly required. Any individual who engages in money laundering, or who fails to comply with all applicable AML laws, regulations, and Lehman's AML policies, will be subject to disciplinary action. With respect to Lehman's clients or counterparties, the firm reserves the right to terminate immediately any business relationship that violates or presents the risk of violating such laws, regulations or policies of the firm.

The Lehman AML compliance program contains the following components:

1. Designation of a Global AML Compliance Officer
2. Risk Assessment
3. Internal Policies and Procedures, including the following:
 - Customer identification and customer due diligence programs and enhanced due diligence of customers presenting higher risk
 - Government sanctions-list screening program
 - Suspicious activity monitoring and reporting
 - Reporting and recordkeeping requirements
 - Receipt and response to information requests
4. Training
5. Independent Testing