

Regulatory information

SGM Law is a trading style of SGM Law Ltd ("we", "us", "our") a limited company formed under the law of England & Wales (registered number 13665377) and a list of directors is available for inspection at the registered address at 30 Binney Street, London, W1K 5BW.

SGM Law Ltd is authorised and regulated by the Solicitors Regulation Authority ("SRA") with SRA number 832535. The SRA Handbook 2011 sets out our professional and ethical rules and obligations (including the SRA Code of Conduct and SRA Accounts Rules) and can be viewed at www.sra.org.uk. The word "partner" denotes a director of SGM Law or an employee or consultant with equivalent standing and qualifications.

We maintain professional indemnity insurance led by Endurance Worldwide Insurance Ltd. Our insurance covers our services globally and extends to acts and omissions wherever they occur in the world.

SGM Law is registered for Value Added Tax purposes with VAT number: 397035276.

Financial Services and Markets Act 2000

Some investment-related activities (including insurance distribution activities) of SGM Law are regulated under the Financial Services and Markets Act 2000 of the United Kingdom ("FSMA").

Like most law firms, we are not authorised by the Financial Conduct Authority (the "FCA") under FSMA. Instead, we are authorised and regulated by the SRA. The Law Society is a designated professional body for the purposes of FSMA, but responsibility for regulation and complaints handling has been separated from the Law Society's representative functions. The SRA is the independent regulatory body of the Law Society and the Legal Ombudsman deals with complaints about lawyers registered in England and Wales. In the light of this, we can provide investment-related services (including insurance distribution activities) if they are an incidental part of the professional services we have been engaged to provide, if they can reasonably be regarded as a necessary part of our professional services or if we are otherwise permitted to provide them under FSMA. For the purpose of insurance distribution activities (broadly, advising on, selling and the administration of insurance contracts), we are included on a register maintained by the FCA and are permitted by the FCA to carry on insurance distribution activities. This register can be accessed via the FCA website at www.fca.org.uk/register.

Anti-money laundering

We may require clients to provide documents and information concerning the contracting client entity and related persons, entities or affiliates, in order to comply with relevant anti-money laundering laws and regulations. We may be prevented from carrying out your instructions if we are unable to meet our requirements, which often include verifying the identities of the ultimate beneficial owners of companies and other corporate bodies.

We may be required by law or regulation to report to a governmental or regulatory authority our knowledge and/or suspicion that certain criminal offences have been committed,

regardless of whether such an offence has been committed by a client of ours or by a third party. We may not be able to discuss such reports with you because of restrictions imposed by those laws and regulations, and we may have to cease acting for you in those circumstances. You agree that we will not be responsible for any adverse consequences you may suffer as a result of our compliance with such laws and regulations, whether caused by our inactivity or otherwise.

Anti-bribery and corruption

Our policy is to act at all times in accordance with the highest professional, ethical and business standards, and we expect the same from our clients and their related persons, entities or affiliates. We have a zero-tolerance approach to bribery or corruption and you agree not to expect or request any conduct from us that might bring our name into disrepute or compromise our integrity and independence and that you or your related persons, entities or affiliates will refrain from any practices involving bribery or any other corrupt activities.

Client audit requests

If we are required by any governmental or regulatory body, or by your auditing accountants or any other service provider appointed by you, to produce documents or provide information on any engagement, we shall be entitled to bill you for the work involved (and any disbursements or expenses incurred) at the rates agreed for the relevant matter.

In response to any request to provide information to your auditors, our policy is to comply with the laws and regulations applicable to us and in particular with the guidance from the Law Society of England & Wales.

Managing complaints

If you wish to make a complaint about us then, in the first instance, please contact the person with whom you are working or corresponding to set out your concerns. We will do our best to resolve any issues at this stage and, if applicable, will confirm our complaints handling procedure in writing (which is available to clients at any time on request).

If you are not satisfied with our attempt to handle and resolve matters, you may be able to ask the Legal Ombudsman to consider the issue - write to:

- PO Box 6806, Wolverhampton, WV1 9WJ; or
- email: enquiries@legalombudsman.org.uk; or phone 0300 555 0333).

The Legal Ombudsman expects complaints to be made to them within one year of the date of the act or omission about which you are concerned or within one year of you realising there was a concern. You must also refer your concerns to the Legal Ombudsman within six months of our final response to you.

The Legal Ombudsman may refer your complaint to the SRA if they are not the correct body to consider the matter, as the Legal Ombudsman's services are only available for certain types of complaints and complainants. Further details can be found on the Legal Ombudsman's at www.legalombudsman.org.uk and on the SRA's website www.sra.org.uk.



Note also that if you are a client and your complaint is about our invoices, you may also apply to the court for an assessment of the bill under Part III of the Solicitors' Act 1974. If all or part of any bill remains unpaid, we may be entitled to charge interest.

Client Account and Interest

Pursuant to the SRA Accounts Rules, our policy is to account to our clients for a sum in lieu of interest on a fair and reasonable basis. If the total amount of interest calculated over the course of a matter is less than £50 no payment in lieu of interest will be paid. Client monies will be deposited in a general client account (an instant access account in which amounts for different clients are pooled) unless we are instructed to create a separate designated account. In any event, it is unlikely that a client will receive as much interest as might have been obtained had the funds been invested by the client itself.