



## **Policy Against Money Laundering**

ROIC is committed to minimizing the risk of our operations being used by money launderers and to preventing any financing of terrorism. We will comply with all applicable anti-money laundering laws and we will not knowingly do business with anyone who we suspect of being connected with criminal or terrorist activity or who is subject to applicable trade sanctions. We will never knowingly participate in a scheme to launder money, under-report the size of a cash transaction or wrongfully avoid tax liability.

Furthermore, we will take reasonable steps to know our clients in order to reduce the chance that we will be unwittingly used to assist in money laundering. When engaging in any type of financial transaction including, but not limited to, movements of funds for or on behalf of ROIC, the relevant employee, officer or director must ensure that he or she obtains and maintains adequate supporting documentation to identify the legitimate and legal source or recipient of all funds sent or received by ROIC. Systems are in place to identify individuals and organizations which represent a higher risk to the Company of money laundering, such as persons identified on lists maintained by the Office of Foreign Assets Control "OFAC". Appropriate procedures operate to mitigate these risks. Purchase agreements, sale agreements, and leases with tenants restrict ROIC from doing business with persons identified on lists maintained by OFAC.

The Company's employees, officers and directors are required to immediately report any suspicious activities to the Compliance Officer.