# Regulatory Disclosures

Locke 27, LLC · Version 0.9 · Last updated October 14, 2026

Draft v0.9 pending review by counsel. Modeled on current practice among comparable private-markets platforms. Published as an interim measure so that no part of the site operates without governing terms; it will be replaced by the counsel-approved version, and members will be asked to re-accept any agreement whose terms change materially.

## Who we are

Locke 27, LLC is a Delaware limited liability company that operates a technology and administration platform for the ownership, administration and transfer of interests in private funds. Locke27 is not registered as a broker-dealer, investment adviser, exchange, alternative trading system, transfer agent, bank or trust company, and does not hold itself out as any of them.

## Who performs licensed functions

Where a licensed function is required, it is performed by a licensed third party. [Counsel to complete when partners are engaged: broker-dealer of record for private placements; secondary transfer facility or alternative trading system, if any; transfer agent for feeder interests, if any; program bank for member cash.] Until a partner is named here, Locke27 does not perform that function.

## The offerings

Interests in Locke feeder funds are offered privately under Rule 506(c) of Regulation D to verified accredited investors (and, where a fund requires it, qualified purchasers) in the United States only. They are not registered under the Securities Act of 1933 or any state law and are offered in reliance on exemptions. They cannot be resold except as permitted by law and by the fund's documents. Nothing on the public website is an offer; offers are made only through the member Platform and the offering documents.

## Cash

Cash on the Platform is a deposit at a program bank held for the benefit of members and spread across insured depository institutions through an insured cash sweep, within program limits. Locke27 is not a bank. See the Cash Program Terms.

## Conflicts

Locke27 earns fees on calls, distributions, transfers and cash interest as set out in the Fee Schedule. Locke27 does not earn fees from sponsors, does not take positions in the funds, does not use order

information for its own account, and does not pay or receive compensation for directing investments to any fund. Any change to this will be disclosed here.

## Complaints

Send complaints to legal@locke27.com or to Locke 27, LLC, 200 Clarendon Street, Boston, MA 02116. We acknowledge complaints within five business days.

## Business continuity

Member records are kept in redundant systems with backups in separate locations; feeder registers are maintained independently of the Platform's front end so that ownership records survive an outage. A summary of our business continuity plan is available on request.