

ANTI-MONEY LAUNDERING POLICY

Version 1.0

1. LARGE CASH TRANSACTION REPORTING

All cash transactions exceeding \$10,000 must be reported to FinCEN within 15 days. Documentation must include transaction details, customer information, and purpose.

2. STRUCTURING DETECTION

Multiple transactions just below the \$10,000 reporting threshold within a short time period may indicate structuring or smurfing activities. These patterns must be flagged for review.

3. HIGH-RISK ACCOUNT MONITORING

Accounts classified as high-risk must undergo enhanced due diligence and continuous monitoring. Any unusual activity must be investigated within 24 hours.

4. SANCTIONS SCREENING

All customers and transactions must be screened against OFAC sanctions lists and PEP databases before account opening and on an ongoing basis.

5. CUSTOMER DUE DILIGENCE

Know Your Customer (KYC) procedures must be completed for all new accounts, including identity verification, beneficial ownership identification, and risk assessment.