

## **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.