**Surveillance and Monitoring Policy**

Purpose: The purpose of surveillance and monitoring is to identify and flag potentially suspicious or unusual activity for review and provide for the timely reporting of such activity, if ultimately determined suspicious or unusual.

Summary: The Surveillance and Monitoring Policy identifies the specific alert routines developed by Acme, LLC dba Smartcashpay Vending (“Smartcashpay”) to screen customer and transactional information for potentially suspicious or unusual activity. The alert routines monitor customers for unusual volume, size, or pattern of transactions, taking into account risk factors and “red flags” appropriate to its business model.

Process: Alerts are generated internally and/or via third-party software vendor. The alerted information is then exported to the Dedicated Compliance Officer of Smartcashpay. Review and disposition of each alert should be completed by the Dedicated Compliance Officer and/or designee within fifteen (15) calendar days of receipt.

Upon review, the Dedicated Compliance Officer and/or designee will document customer and transactional information, the decision as to whether a SAR was filed, and any supporting research.

Alerts: Smartcashpay has developed and implemented the following alert routines:

*Routine Name: Customer Identification – Threshold Aggregate – Cash In*

*Alert Routine Threshold*: Multiple transactions in a 24-hour period; transactions initiated with cash; same SMARTCASH address and/or same name; aggregate total denomination between $1,000 and $5,000.

*Description*: Customer transacts multiple exchanges of U.S. Dollar-denominated cash for SMARTCASH-denominated cryptocurrency in an aggregate amount equal to the threshold for customer identification ($1,000), but no greater than $5,000.

*Routine Name: Customer Identification – Threshold Aggregate – Cash Out*

*Alert Routine Threshold*: Multiple transactions in a 24-hour period; transactions initiated with SMARTCASH; same SMARTCASH address and/or same name; aggregate total denomination between $1,000 and $5,000.

*Description*: Customer transacts multiple exchanges of SMARTCASH-denominated cryptocurrency for U.S. Dollar-denominated cash in an aggregate amount equal to the threshold for customer identification ($1,000), but no greater than $5,000.

*Routine Name: Currency Transaction Report – Threshold Aggregate – Cash In*

*Alert Routine Threshold*: Multiple transactions in a 24-hour period; transactions initiated with cash; same SMARTCASH address and/or same name; aggregate total denomination greater than or equal to $10,000.01.

*Description*: Customer transacts multiple exchanges of U.S. Dollar-denominated cash for SMARTCASH-denominated cryptocurrency in an aggregate amount exceeding the threshold that would trigger a Currency Transaction Report (>$10,000).

*Routine Name: Currency Transaction Report – Threshold Aggregate – Cash Out*

*Alert Routine Threshold*: Multiple transactions in a 24-hour period; transactions initiated with SMARTCASH; same SMARTCASH address and/or same name; aggregate total denomination greater than or equal to $10,000.01.

*Description*: Customer transacts multiple exchanges of SMARTCASH-denominated cryptocurrency for U.S. Dollar-denominated cash in an aggregate amount exceeding the threshold that would trigger a Currency Transaction Report (>$10,000).

*Routine Name: SMARTCASH Address/Customer – Transaction Velocity – Cash In*

*Alert Routine Threshold*: Four (4) or more transactions in a 24-hour period; transactions initiated with cash; same SMARTCASH address and/or same name.

*Description*: Customer transacts multiple exchanges of U.S. Dollar-denominated cash for SMARTCASH-denominated cryptocurrency in excess of average individual expected volume.

*Routine Name: SMARTCASH Address/Customer – Transaction Velocity – Cash Out*

*Alert Routine Threshold*: Four (4) or more transactions in a 24-hour period; transactions initiated with SMARTCASH; same SMARTCASH address and/or same name.

*Description*: Customer transacts multiple exchanges of SMARTCASH-denominated cryptocurrency for U.S. Dollar-denominated cash in excess of average individual expected volume.

*Routine Name: SMARTCASH Address/Customer – Transaction Volume – Cash In*

*Alert Routine Threshold*: Four (4) or more transactions in a 15-day period; transactions initiated with cash; same SMARTCASH address and/or same name; individual denominations between $2,000 and $3,000.

*Description*: Customer transacts multiple exchanges of lower U.S. Dollar-denominated cash for SMARTCASH-denominated cryptocurrency which aggregates to a substantial sum of money.

*Routine Name: SMARTCASH Address/Customer – Transaction Volume – Cash Out*

*Alert Routine Threshold*: Four (4) or more transactions in a 15-day period; transactions initiated with SMARTCASH; same SMARTCASH address and/or same name; individual denominations between $2,000 and $3,000.

*Description*: Customer transacts multiple exchanges of SMARTCASH-denominated cryptocurrency for lower U.S. Dollar-denominated cash which aggregates to a substantial sum of money.

*Routine Name: SMARTCASH Address – Multiple Customers – Cash In*

*Alert Routine Threshold*: Multiple transactions; transactions initiated with cash; single wallet address; multiple names.

*Description*: Multiple customers transacting exchanges of U.S. Dollar-denominated cash for SMARTCASH-denominated cryptocurrency using a single SMARTCASH address.

*Routine Name: SMARTCASH Address – Multiple Customers – Cash Out*

*Alert Routine Threshold*: Multiple transactions; transactions initiated with SMARTCASH; single wallet address; multiple names.

*Description*: Multiple customers transacting exchanges of SMARTCASH-denominated cryptocurrency for U.S. Dollar-denominated cash using a single SMARTCASH address.

Records: Smartcashpay will retain all records relating to generated alert routines, including its decision as to whether a SAR was filed, and any supporting documentation. Smartcashpay will retain these records for at least five (5) years from the date of review disposition. These records will be filed or stored in such a way as to be accessible within a reasonable period of time.

Approval: Smartcashpay’s Senior Management has approved the Surveillance and Monitoring Policy. This approval is indicated by the signature below.

Signed:

Name:

Title:

Date: