

Anti-Money Laundering (AML) Policy 2025

1. Purpose This policy establishes procedures for monitoring and reporting suspicious financial transactions in accordance with AML regulations.
2. Large Cash Transaction Rule
 - Any single cash transaction greater than \$10,000 must be flagged for review.
 - Multiple cash transactions by the same customer within a 24-hour period that total more than \$10,000 must also be flagged.
3. High-Risk Country Rule
 - Transactions involving counterparties located in countries on the FATF blacklist must be blocked.
4. Politically Exposed Person (PEP) Rule
 - If a customer is identified as a PEP, all transactions over \$5,000 require human approval.
5. Audit Trail
 - All flagged or blocked transactions must be logged with a timestamp and reason for action.
6. Regulatory Citations
 - This policy is based on the Bank Secrecy Act (31 U.S.C. 5311 et seq.) and FATF Recommendations.

Example Transaction: - Customer: John Doe - Amount: \$12,500 - Method: Cash - Country: North Korea - PEP: Yes

Expected Actions: - Flag for review (large cash) - Block (high-risk country) - Require approval (PEP) - Log all actions