

## **(AML) ANTI-MONEY LAUNDERING POLICY**

MoneyBlock recognizes that The International Money Laundering Abatement and Anti-Terrorist Financing Act of 2001 ("Act") imposes important new obligations on all financial firms for the detection, deterrence and reporting of money laundering activities. Under the Act, money laundering is defined as any financial transaction using income derived from criminal activity including, but not limited to, drug trafficking, fraud, illegal gambling and terrorism. MoneyBlock has established the following policies to ensure thorough compliance with all laws and regulations regarding money laundering. Prior to the opening of any new account, MoneyBlock shall document the identity, nature of business, income, source of assets, and investment objectives of each prospective customer. Accounts for persons or entities from countries that do not cooperate with the Financial Action Task Force (FATF) guidelines on money laundering shall be subject to a heightened level of scrutiny. Accounts in the name of, or related to, any person or entity on the Office of Foreign Asset Control (OFAC) Specially Designated Nationals and Blocked Person list shall not be permitted. On an ongoing basis, MoneyBlock shall review account activity for evidence of suspicious transactions that may be indicative of money laundering activities. This review may include surveillance of: 1) money flows into and out of accounts, 2) the origin and destination of wire transfers, 3) non-economic transactions, and 4) other activity outside the normal course of business. Every officer, employee and associated person ("AP") of MoneyBlock shall be responsible for assisting in the firm's efforts to uncover and report any activity that might constitute, indicate or raise suspicions of money laundering. To this end, MoneyBlock shall provide continuing education and training of all such persons. Should any officer, employee or AP of MoneyBlock have any knowledge, suspicions or information regarding potential money laundering activities, that individual shall immediately notify MoneyBlock Compliance Department. MoneyBlock Compliance Officer shall document the reported activity, investigate fully, and, if warranted, report such activity to the senior management of MoneyBlock. MoneyBlock shall comply with all trade and economic sanctions imposed by OFAC against targeted foreign countries and shall cooperate fully with government agencies, self-regulatory organizations and law enforcement officials. As provided by the Act, MoneyBlock may supply information about former, current or prospective customers to such bodies. Any officer, employee or AP who fails to comply with MoneyBlock policies and procedures on money laundering may be subject to disciplinary action, including termination of employment. In addition, such failure may expose the individual to civil and criminal penalties under the Act.