

AML Policy Statement

To whom it may concern

HSC have only internal business member of corporate treasury funds and is an exempted non-bank depository under FFIEC [1010.315](#), for TMS banking as Treasury Bank for its Administrator, Merchants and investors accountholders (collectively called its members) However in respect to national policy the HSC has developed a straightforward sound and reasonable AML policy for its members.

Although HSC is open to work with all enforcement agencies including FinCEN, DOJ, and OFAC as well as federal, state, and local regulators, by being subject to the BSA/AML requirements should therefore take care to develop, implement, and maintain procedures covering the following areas:

- Asset Risk Assessment
- Members' identification
- BDD
- Funding risk rating
- Monitoring
- Investigation
- SARs
- CTRs

AML policies, procedures, and internal controls that are reasonably designed to assure compliance with the BSA, including procedures to:

- Independent review to monitor and maintain an adequate program.
- Verify member identification
- File reports
- Maintain records, and
- Respond to law enforcement requests.
- A designated person to assure day-to-day compliance with the program.
- Education and training of appropriate personnel; and

Compliance Person

The company has designated

Hillery Marcellus Scott

Chief Financial Officer and Treasurer
1900 North 1900 St
Monroe, LA 71201
mail@hillscott.com

Hillery M. Scott is the Anti-Money Laundering Program Compliance Person (AML Compliance Person), with full responsibility for the firm's AML program.

Hillery has a working knowledge of the BSA and its implementing regulations and is qualified by experience, knowledge, and training, including. The duties of the AML Compliance Person will include monitoring the firm's compliance with AML obligations, overseeing communication and training for employees. Also ensure that the firm keeps and maintains all the required AML records and will ensure that Suspicious Activity Reports (SARs) are filed with the Financial Crimes Enforcement Network (FinCEN) when appropriate. The AML Compliance Person is vested with full responsibility and authority to enforce the firm's AML program.

Registration.

The HSC is registered with SEC and FinCEN; and under is states exemption from registering due to all transactions are non-state consumers with a direct solicited to any state consumer residents. All treasures are proprietary, as disregarded trading partners which generally do not have to register.

It will promptly notify regulatory authorities of any change in this information through FinCen and will review, and if necessary, update, this information within 17 business days after the end of each calendar year. The annual review of information will be conducted by Hillery Scott and will be completed with all necessary updates being provided no later than 17 business days following the end of each calendar year. In addition, if there is any change to the information, Hill Scott will update the information promptly, but in any event not later than 30 days following the change.

Reporting.

HSC report currency transaction reports (CTRs) on cash transactions exceeding \$10,000 and suspicious-activity reports (SARs) on suspicious transactions exceeding \$2,000. MSBs must retain CTRs and SARs for five years from the date of filing.

HSC may disclose SARs to only a limited group: FinCEN; a federal authority (such as the IRS) or state authority with power to examine the MSB for compliance with the BSA; and federal, state, and local law enforcement. Strict confidentiality requirements apply, with criminal penalties for unauthorized disclosure. The business may share facts, transactions, and documents underlying a SAR with other institutions and, in limited circumstances (permitted by regulation or regulatory guidance), may share the actual report within the organization. MSBs are protected from civil liability extending from SAR filings. FinCEN and its delegates are responsible for examining MSBs for compliance with these requirements.

Reporting AML Information to Federal Law Enforcement Agencies and

Other Financial Institutions under FinCEN Requests Under USA PATRIOT Act Section 314(a)

HSC will respond to a Financial Crimes Enforcement Network (FinCEN) request concerning accounts and transactions (a 314(a) Request) by immediately searching our records to determine whether we maintain or have maintained any account for, or have engaged in any transaction with, each individual, entity or organization named in the 314(a) Request as outlined in the Frequently Asked Questions (FAQ) located on FinCEN's secure website.

HSC c/o Treasury Bank understand that we have 14 days (unless otherwise specified by FinCEN) from the transmission date of the request to respond to a 314(a) Request. Treasury Management will designate through one or more persons to be the point of contact (POC) for 314(a) Requests and will

promptly update the POC information following any change in such information. Unless otherwise stated in the 314(a) Request or specified by FinCEN, we are required to search those documents outlined in FinCEN's FAQ.

If HSC find a match, it will report it to FinCEN via FinCEN's Web-based 314(a) Secure Information Sharing System within 14 days or within the time requested by FinCEN in the request. If the search parameters differ from those mentioned above (for example, if FinCEN limits the search to a geographic location), HSC will structure our search accordingly. If HSC searches our records and does not find a matching account or transaction, then the Administrator will not reply to the 314(a) Request.

HSC will

- ✓ not disclose the fact that FinCEN has requested or obtained information from us, except to the extent necessary to comply with the information request.
- ✓ review, maintain, and implement procedures to protect the security and confidentiality of requests from FinCEN similar to those procedures established to satisfy the requirements of Section 501 of the Gramm-Leach-Bliley Act with regard to the protection of customers' nonpublic information.
- ✓ direct any questions we have about the 314(a) Request to the requesting federal law enforcement agency as designated in the request.
- ✓ unless otherwise stated in the 314(a) Request, we will not be required to treat the information request as continuing in nature, and we will not be required to treat the periodic 314(a) Requests as a government provided list of suspected terrorists for purposes of the customer identification and verification requirements.

Training Courses

HSC has an AML training processes that determine which transactions are potentially suspicious and implement a strong BSA and AML compliance program that uses comprehensive Customer Due Diligence (BDD) policies, procedures, and processes for all customers, particularly those that present a higher risk for money laundering and terrorist financing.

Who Is Responsible for the Training?

Hillery M. Scott is Chief Financial Officer and Fiduciary

What are the Key Elements Of Training?

- Identify at least a beneficial owner under the control criterion for each legal entity customer.
- Provide for annual independent testing for compliance to be conducted by member personnel or by a qualified outside party (or every two years if the firm does not execute transactions with members or otherwise
- holds funds by name, title, mailing address, e-mail address, telephone number, and facsimile number)
- an individual or individuals responsible for implementing and monitoring the day-to-day operations and internal controls of the program.

- Such individual or individuals are associated persons of the firm with respect to functions undertaken on behalf of the firm.
- Each member must review and, if necessary, update the information regarding a change to its AML compliance person within 30 days following the change and verify such information within 17 business days after the end of each calendar year

Further, the program must be approved in writing by a member of senior management and be reasonably designed to achieve and monitor the member's ongoing compliance with the requirements of the Bank Secrecy Act and the implementing regulations promulgated thereunder.

What is taught in the Training Courses

What's, how's, and preventative measures for money laundering, including red flags, customer due diligence, and information-sharing policies. They may also help you meet anti-money laundering / AML certification requirements in your state. The criteria that constitute a high-risk person, product or service, and geographic location

- High Risk Geographic Locations
- Business Due Diligence (BDD)
- Information Sharing
- Office of Foreign Assets Control (OFAC)
- High Risk Persons and Entities
- High Risk Products and Services

Note: the BSA does not require, and neither FinCEN nor the federal banking agencies expect banks to serve as the de facto regulator of any Money transmitted or it's individual customer. Furthermore, while banks are expected to manage risk associated with all accounts, including NBFI accounts, banks or clearing houses will not be held responsible for the Administrator's compliance with the BSA and other applicable federal and state laws and regulations. Administrator compliance objectives are to assess the adequacy of a professional financial systems and to manage the risks associated with accounts of the office ability to implement effective monitoring and reporting systems.



Hillery M. Scott, CFO and Treasurer