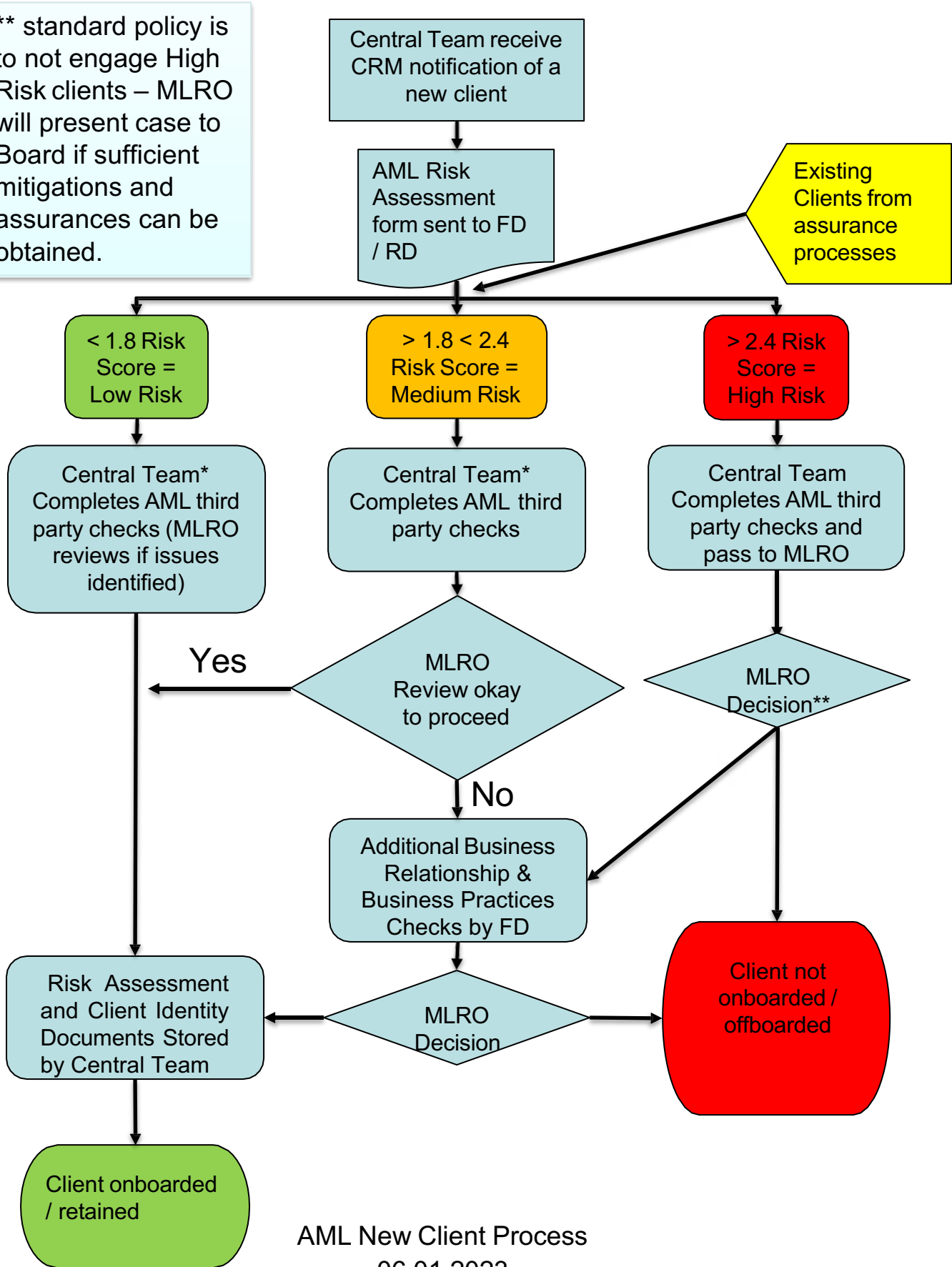
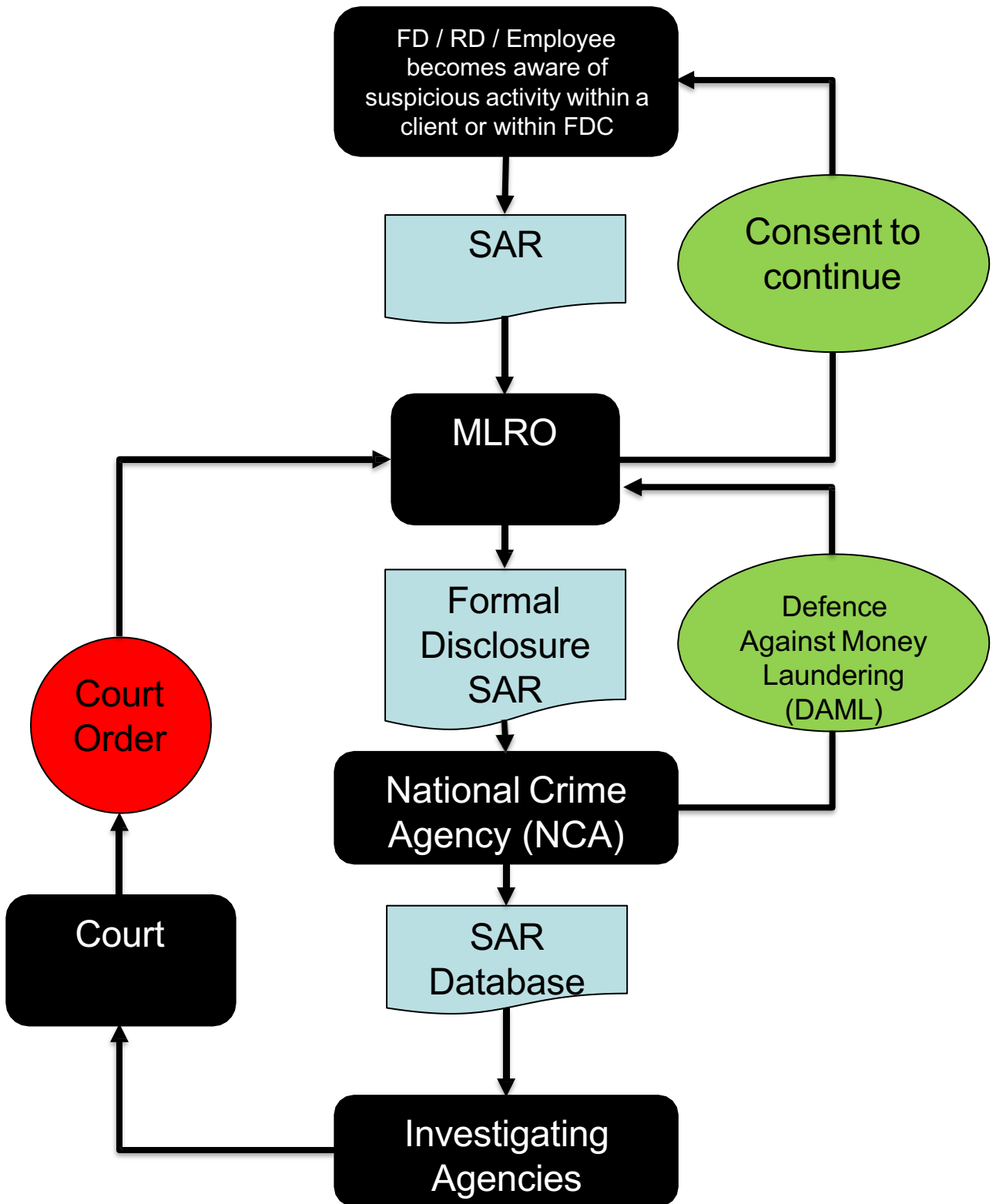


New Client Anti-Money Laundering Risk Assessment & Client Due Diligence Process

** standard policy is to not engage High Risk clients – MLRO will present case to Board if sufficient mitigations and assurances can be obtained.





Existing Client Anti-Money Laundering Risk Assessment & Due Diligence– Assurance Process

