

**As of June 1, 2020**

**IMEX USA, Inc. and IBank, Inc.**

**Anti-Money Laundering Compliance Program**

IMEX USA, Inc. and ("IMEX") and each of its majority-owned subsidiaries (together with IMEX, the "FIRM") are firmly committed to participating in international efforts to combat money laundering and the funding of terrorist activities.

The Firm has implemented a risk-based global Anti-Money Laundering ("AML") Compliance Program ("AML Program") designed to comply with AML laws and regulations in the U.S., including the Bank Secrecy Act, as amended by the USA PATRIOT Act of 2001, and other applicable laws and regulations relating to the prevention of money laundering and terrorist financing in the jurisdictions where the Firm operates.

The AML Program consists of, among other things:

- AML Compliance Officers who are responsible for coordinating and monitoring day to day compliance with the AML Program for their businesses and regions respectively;
- AML risk assessments at the program, customer and product and service levels;
- Written policies, procedures, and a system of internal controls designed to facilitate ongoing compliance with applicable AML laws and regulations;
- A Customer Identification Program ("KYC") designed to identify and verify all customers and, where applicable, beneficial owners to the extent warranted by the risk of money laundering or terrorist financing or as required by regulation;
- Performance of customer due diligence and additional due diligence on higher risk customers, including corporate entities and those who are assessed to be politically exposed persons;
- Risk-based measures and systems for monitoring transaction activity through customers', including those who are considered to be politically exposed persons;

- Identification and reporting of suspicious activity to appropriate regulatory authorities in accordance with applicable laws;
- AML training for appropriate personnel;
- Independent audit and compliance testing functions to review and assess the Firm for compliance with the AML Program and applicable laws;
- Prohibition from conducting business with shell banks; and
- Record keeping and reporting requirements, including those for cash transactions and records obtained pursuant to the Customer Identification Program, which are maintained for at least 5 years after the termination of a customer relationship.

While the Firm is not currently subject to the regulations administered by the U.S. Treasury Department's Office of Foreign Assets Control ("OFAC") the Firm has implemented policies and procedures designed to comply with the prohibitions and restrictions mandated by OFAC and all other sanctions laws and regulations applicable in the jurisdictions where the Firm operates.

Compliance with the legal and regulatory requirements that govern the management of client relationships is critical for the Firm to protect itself and the international financial system from the abuses of illicit finance.

Moreover, compliance with our AML Program and internal procedures allows us to maintain good standing in the jurisdictions in which we transact business.

**The Firm cooperates to the fullest extent permitted by law with investigations and inquiries from law enforcement and regulatory authorities.**