

Anti-Money Laundering Program

ABN AMRO Clearing USA LLC (“AAC-USA”) is a registered securities broker-dealer with the Securities and Exchange Commission (“SEC”) and is also regulated by the Commodity Futures Trade Commission (“CFTC”), Chicago Board Options Exchange (“CBOE”), Financial Industry Regulatory Authority (“FINRA”), National Futures Association (“NFA”) and the CME Group.¹

AAC-USA has established and maintains an Anti-Money Laundering (“AML”) program pursuant to AML laws and regulations including, but not limited to, the Bank Secrecy Act (“BSA”) as amended by the Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism (“USA PATRIOT”) Act, and the Office of Foreign Assets Control (“OFAC”) regulations. To this end, AAC-USA has adopted a written AML program that is comprised of the following essential requirements:

- AML governance characterized by the designation of an AML Officer responsible for maintaining senior leadership commitment, establishing AML compliance processes, and setting and directing AML strategy.
- Policies and procedures that set corporate standards pertaining to the detection and reporting of money laundering and terrorist financing.
- Awareness, training, and communication to promote a risk culture that supports AML compliance.
- Audit and testing that provides independent evaluation of the AML program and validates and tests AML process and procedure effectiveness.

AAC-USA has also implemented policies, procedures, and internal controls reasonably designed to comply with the regulations and economic sanctions programs as administered by OFAC.

September 2023

¹ This representation is not intended to be, and should not be used as, a reliance contract or reliance agreement.