



Anti-Money Laundering (AML) Policy

Introduction

This AML Policy complies with applicable U.S. laws, regulations, and directives intended to prevent money laundering and the financing of terrorism. Atlas Capital is committed to upholding the highest ethical and professional standards and has implemented measures to safeguard against misuse by criminal entities.

The firm has instituted a comprehensive Know Your Customer (KYC) framework as an integral component of its risk management and internal controls. Key components include:

- Risk-based customer acceptance policy
- Identity verification and due diligence
- Continuous monitoring of high-risk accounts
- Structured risk assessment practices

Atlas Capital is obligated to verify the identity of clients and actively monitor account activity to detect suspicious or non-conforming transactions. The extent of KYC measures applied is proportional to the risk level associated with each client.

1. Customer Acceptance Policy

Atlas Capital maintains a documented customer acceptance policy, particularly focused on identifying higher-risk clients. Prior to onboarding any client, the firm conducts KYC and due diligence assessments based on:

- Client's background and source of funds
- Country of residence and/or origin
- Politically exposed status (PEPs)
- Age (must be 18 or older)
- Associated accounts or third-party relationships
- Business type and economic activity



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- Other relevant risk indicators

Enhanced due diligence is mandatory for individuals from high-risk jurisdictions, politically exposed persons, and high-net-worth clients with unclear sources of wealth. All initial funding must come through established U.S. financial institutions subject to AML compliance. Senior management reviews and approves any relationship with high-risk clients.

Client Onboarding Procedures Include:

- Verification of identification and supporting documentation
- Review of deposit methods to identify anomalies or potential red flags
- Strict adherence to AML protocols for funding and withdrawals

2. Customer Identification Program (CIP)

As part of the CIP, Atlas Capital defines a "customer" to include:

- Individuals or entities maintaining accounts with the firm
- Beneficial owners of such accounts
- Individuals involved in transactions who may pose legal or reputational risks

The firm will not establish a client relationship until identity verification is satisfactorily completed.

Verification Process Includes:

- Collection of government-issued photo ID and address verification documents
- Enhanced procedures for non-resident clients
- Refusal to onboard clients unable to meet KYC requirements

Regular reviews ensure information remains accurate and up to date. This is particularly enforced when:

- A significant transaction occurs
- Regulatory requirements evolve



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- Account usage materially changes
- Gaps in customer information are detected

If deficiencies are found during periodic reviews or supervisory audits, corrective actions are implemented immediately.

3. Due Diligence and Risk Management

Atlas Capital understands the reputational risks associated with private and confidential accounts, whether personal, business, or trust-based. The firm applies enhanced due diligence and ensures all accounts, particularly high-risk or private structures, receive appropriate scrutiny.

All new accounts are approved by compliance personnel or the firm's AML Officer. High-risk client approvals are escalated to executive management. Confidentiality is protected internally, while enabling independent audit and regulatory review.

4. Recordkeeping

Atlas Capital follows strict record retention policies:

- Identification records are kept for at least seven years after account closure
- Transaction records are retained for a minimum of seven years after termination or completion

These practices are essential to support transaction analysis, dispute resolution, compliance audits, and potential legal investigations.