

Last Update May 2026

Zenus Bank Anti-Money Laundering Compliance Program

Zenus Bank is firmly committed to supporting international efforts to combat money laundering, terrorist financing, fraud, sanctions evasion, and other illicit financial activities.

Zenus Bank has implemented a risk-based Anti-Money Laundering (“AML”) Compliance Program designed to comply with applicable U.S. laws and regulations, including the Bank Secrecy Act (“BSA”), as amended by the USA PATRIOT Act, and other applicable anti-money laundering and counter-terrorist financing requirements.

Our AML Compliance Program includes, among other elements:

- Designated compliance leadership responsible for overseeing and administering the AML program;
- Risk-based policies, procedures, and internal controls designed to promote ongoing compliance with applicable laws and regulations;
- Customer Identification Program (“CIP”) and Customer Due Diligence (“CDD”) procedures designed to verify customer identity and understand the nature and purpose of customer relationships;
- Enhanced due diligence procedures for higher-risk customers and activities;
- Risk-based transaction monitoring and screening systems;
- Identification, investigation, and reporting of suspicious activities in accordance with applicable laws and regulations;
- Ongoing AML and sanctions compliance training for appropriate personnel;
- Independent testing and review of AML controls and procedures;
- Policies prohibiting relationships with prohibited shell banks;
- Recordkeeping and reporting procedures consistent with regulatory requirements;
- Sanctions compliance measures designed to support compliance with regulations administered by the U.S. Department of the Treasury’s Office of Foreign Assets Control (“OFAC”).

Zenus Bank continuously reviews and enhances its compliance framework to address evolving regulatory expectations and emerging financial crime risks. We cooperate with law enforcement and regulatory authorities to the fullest extent permitted by applicable law.

Compliance with AML, sanctions, and financial crimes regulations is fundamental to protecting the integrity of the global financial system and maintaining the trust of our customers, partners, and regulators.

Sincerely,



Gabriel Viera

Zenus Bank