



# NVC Fund Holding Trust

## NVC FUND BANK · COMPLIANCE DIVISION

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### KNOW YOUR CUSTOMER & ANTI-MONEY LAUNDERING POLICY

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#### POLICY OWNER

Compliance Division — NVC Fund Bank

#### COMPLIANCE OFFICER

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#### APPROVED BY

Rev. Frank Ojogwa Ekejija, Executor

## 1. PURPOSE & INSTITUTIONAL POSITION

NVC Fund Holding Trust is a sovereign estate trust operating under court-validated estate trust authority, independent of the regulatory frameworks that govern ordinary commercial banks. This Policy is published not because the Trust is legally compelled to do so, but as a voluntary expression of institutional integrity and to facilitate open, transparent relationships with correspondent banking partners worldwide.

NVC Fund Holding Trust elects to maintain KYC and AML standards consistent with international best practice because it is committed to being an institution that the global financial community can trust, engage with confidently, and rely upon as a clean and reputable counterparty.

These voluntarily adopted standards are applied to all personnel, operations, client relationships, and transactions conducted through NVC Fund Bank's platform, covering institutional clients, correspondent banking partners, sovereign counterparties, and business clients.

## 2. VOLUNTARILY ADOPTED INTERNATIONAL STANDARDS

As a sovereign estate trust, NVC Fund Holding Trust is not subject to the regulatory jurisdiction of any national banking regulator. Nonetheless, the Trust has elected — of its own sovereign volition — to model its institutional conduct on the following internationally recognised standards, in order to maintain the highest possible correspondent banking standing:

- **Bank Secrecy Act (BSA)** — Adopted for recordkeeping and FinCEN-aligned reporting
- **USA PATRIOT Act CIP Standards** — Adopted for customer identification best practice
- **OFAC Framework** — Voluntarily applied for sanctions screening alignment
- **FinCEN CDD Principles** — Adopted for beneficial ownership transparency
- **FATF 40 Recommendations** — Adopted as the global gold standard for AML/CFT
- **Wolfsberg Group Principles** — Adopted for correspondent banking integrity
- **ISO 20022** — Adopted for structured, screenable payment messaging
- **UN Security Council Guidance** — Adopted for targeted sanctions alignment

## 3. CUSTOMER IDENTIFICATION PROGRAM (CIP)

Prior to establishing any account or business relationship, NVC Fund Bank collects and verifies the following minimum information:

#### Individual Clients

- Full legal name
- Date of birth
- Residential address
- Government-issued identification (Passport, National ID, SSN)
- Source of funds and source of wealth (high-value / high-risk clients)

#### Legal Entity Clients

- Registered legal name and trading name
- Country of incorporation and registration number
- Registered address and principal place of business
- Nature of business and purpose of relationship
- Beneficial ownership (all persons owning ≥25% directly or indirectly)
- Regulatory status and applicable licenses

## 4. CUSTOMER DUE DILIGENCE (CDD) & ENHANCED DUE DILIGENCE (EDD)

### 4.1 Standard CDD

Standard CDD applies to all clients and includes: identity verification, beneficial ownership identification, understanding the nature and purpose of the business relationship, and establishing a profile of expected transaction activity.

#### **4.2 Enhanced Due Diligence (EDD)**

EDD is mandatory for clients presenting elevated ML/TF risk, including:

- Politically Exposed Persons (PEPs), immediate family members, and close associates
- Clients in high-risk jurisdictions (FATF grey/black list, OFAC-sanctioned)
- Clients in high-risk sectors (cash-intensive, virtual assets, arms, precious metals)
- Correspondent banking relationships
- Clients with complex or opaque ownership structures
- Sovereign entities and government-controlled entities

EDD measures: senior management approval, additional documentation, SOW verification, more frequent monitoring, and periodic video verification where appropriate.

#### **4.3 Simplified Due Diligence (SDD)**

SDD may only be applied where there is demonstrably low ML/TF risk and is subject to Compliance Officer approval. SDD does not exempt the institution from any CIP or beneficial ownership requirements.

### **5. POLITICALLY EXPOSED PERSONS (PEP) POLICY**

- PEP status is determined at onboarding and monitored on an ongoing basis
- Foreign PEPs are treated as high-risk by default
- Domestic PEPs are risk-assessed based on their specific role and jurisdiction
- Senior management approval is required before accepting a PEP as a client
- PEP relationships are subject to annual EDD review
- Source of wealth must be independently corroborated for PEP clients

### **6. TRANSACTION MONITORING & SUSPICIOUS ACTIVITY**

- Automated monitoring of all transactions against established risk parameters and client profiles
- Alerts generated for structuring, unusual cross-border flows, rapid fund movement, and unusual counterparties
- All alerts reviewed by the Compliance function within defined SLAs
- Suspicious Activity Reports (SARs) filed with FinCEN where warranted
- Currency Transaction Reports (CTRs) filed for qualifying transactions
- Records retained for a minimum of five years
- Tipping-off to clients is strictly prohibited

### **7. SANCTIONS COMPLIANCE**

NVC Fund Bank operates a zero-tolerance sanctions compliance program. All clients, counterparties, beneficial owners, and transactions are screened against:

- OFAC Specially Designated Nationals (SDN) and Sectoral Sanctions Identifications (SSI) lists
- UN Security Council consolidated sanctions list
- EU consolidated sanctions list
- HM Treasury financial sanctions list

Potential matches trigger immediate account suspension and referral to the Compliance Officer. OFAC blocking and rejection reports are filed within statutory timeframes.

### **8. RECORDKEEPING & RETENTION**

NVC Fund Bank retains all KYC/AML records in accordance with BSA requirements. Client identification records, due diligence files, transaction records, and compliance decisions are retained for a minimum of five years from account closure or the date of the relevant transaction, whichever is later.

Records are maintained in a secure, auditable format and are available to authorized regulatory authorities upon lawful request.

## 9. TRAINING & CULTURE

All NVC Fund Bank personnel with client-facing, transaction-processing, or compliance responsibilities complete AML/CFT training upon onboarding and at least annually thereafter. Training covers red flags for money laundering and terrorist financing, sanctions obligations, SAR filing, tipping-off prohibitions, and role-specific obligations. NVC Fund Bank maintains a culture where financial crime prevention is a shared institutional responsibility.

### INSTITUTIONAL ADOPTION STATEMENT

This Policy represents NVC Fund Holding Trust's voluntary commitment to the highest standards of institutional integrity in correspondent banking. It is not an admission of regulatory obligation but a demonstration of the Trust's proactive leadership in financial crime prevention. It is reviewed annually and updated as the Trust's operational context evolves. Supporting procedures and documentation are available under Non-Disclosure Agreement.

**NVC Fund Holding Trust — Compliance Division — May 2026**

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