



Anti-Money Laundering, Sanctions, and Customer Due Diligence Program

RIVERRUN BUSINESS INC. maintains a risk-based BSA/AML program for Individual End-Users, Corporate Entities, and Institutional Participants.

1. Program overview

This program applies to personnel, RFQ matching and routing, participant onboarding, sanctions screening, monitoring, reporting, training, independent testing, and recordkeeping. The company is a FinCEN-registered Money Services Business, not a bank, exchange, custodian, or market maker. It does not hold customer funds.

2. OFAC and multi-jurisdiction sanctions screening

Applicants, beneficial owners, control persons, authorized traders, and required transaction parties are screened against OFAC, United Nations, and other applicable sanctions lists. Screening occurs at onboarding, when lists or risks change, and before required activity. Potential matches are investigated; unresolved matches are blocked or escalated.

3. Individual End-User “KYC / CIP

Individuals provide full KYC: identity, residential address, source of funds and description, tax residency and TIN where applicable, PEP status, transaction purpose, expected monthly volume, and contact details. Government-issued photo ID and proof of residential address are collected through a secure follow-up channel.

4. Corporate Entity “Corporate-KYB

Corporate applicants provide legal name, jurisdiction, Tax ID/EIN, registered address, business description, directors and control persons, full UBO ownership details for natural persons holding 25% or more ownership or control, settlement-authorized account information, expected volume, and contact details. Formation documents and UBO charts are collected through secure follow-up.

5. Institutional Participant “Institutional-KYB with mandatory EDD

Institutional applicants inherit all Corporate-KYB requirements and provide regulatory licenses, authorized trading personnel, a dedicated compliance officer's information and email, and an internal AML policy excerpt. Enhanced due diligence is mandatory and may include source-of-wealth review, regulatory verification, adverse media, senior-management approval, and additional controls.

6. Unified sanctions and Travel Rule controls

Equally strict sanctions controls apply across all categories. Where the Travel Rule applies, required originator, beneficiary, entity, beneficial-owner, and settlement information is collected, shared, or retained as law requires.

7. Monitoring, SAR, and retention

Compliance monitors applications, RFQs, routing records, participant behavior, and public information. A Suspicious Activity Report (SAR) is filed where required. Applications, follow-up documents, audit logs, RFQ and routing records, and reports are retained for five years or longer where law requires.