



Global Anti-Money Laundering Policy

2023

Ethics & Compliance



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1 PURPOSE

The purpose of this Policy is to provide guidance and minimum standards and expectations regarding certain Anti-money Laundering controls that should be implemented to effectively mitigate money-laundering risk and to comply with country's Anti-money Laundering laws and regulations.

Millicom will not engage in or assist any person or entity engaging in any activity reasonably believed to involve Money Laundering, Terrorist Financing avoidance of disclosures to authorities, or other suspicious or criminal activity. Millicom works diligently to prevent criminals from abusing its business systems to further unlawful activities. Money Laundering (as defined below) is a global problem requiring a global approach.

The key risks that this policy seeks to address are:

- Unusual or illicit activities identified in Millicom's financial products (Tigo Money).
- Non-compliance with local regulatory requirements.
- Potential materialization of money laundering.

2 SCOPE AND APPLICABILITY

This Policy applies to all Employees (including contracted staff) and management of Millicom, Tigo, and Millicom Group Companies including its joint ventures.

This is a Global Policy. A Spanish language version of this is also available.

3 DEFINITIONS

Term	Definition
Dealer / Agent	An independent Third Party engaged by Millicom on a contractual basis to provide MFS products and services to Millicom's customer base.
Employee	Direct employees of Millicom and/or employees from all entities that Millicom owns or controls, including Directors and contracted staff.
Know Your Customer (KYC)	Know Your Customer is the process to establish the identity of an individual conducting business with Millicom.
MFS	A broad range of mobile financial services that Millicom offers, including e-payments, money transfers (P2P), international remittances, and lending.
Suspicious Transactions	Transactions that fall outside of the normal or known pattern of a customer's transaction. These transactions could be linked to illicit activities, including money laundering and/or terrorism financing.
Telco	Telecommunication services, including residential, B2B, Pay-Tv, OTT, fixed, mobile and/or wireless internet, mobile and/or fixed telephony services.
Terrorist Financing	Involves the provision, collection, or receipt of funds with the intent or knowledge that the funds will be used to carry out an act of terrorism.
Transaction Monitoring	The process by which customer's transactions are analyzed on an ongoing basis with the purpose of detecting unusual or suspicious activities and to comply with AML and CTF laws and regulations. Transaction monitoring will also assist AML personnel understand customer and dealer/agent

Term	Definition
	transactional behavior, as well as to report unusual activities to the appropriate local regulatory entity.
Specially Designated Nationals (SDN)	Individuals or entities located throughout the world that are blocked or sanctioned pursuant to the various sanctions programs administered by OFAC.
Office of Foreign Assets Control (OFAC)	Is a U.S. Treasury agency that enforces sanctions imposed by the U.S. government against individuals, nations and/or groups.
Know Your Agent (KYA)/ Know Your Dealer (KYD)	Know Your Agent/Know Your Dealer is a process to identify agents and dealers conducting business with Millicom.
Local AML Policies / Manuals	Operations local AML Policies and/or Manuals, elaborated in-country based on local AML regulatory requirements regarding elements of the AML Program, including, but not limited to: Know Your Customer (KYC), AML Training, Transaction Monitoring, Independent Review/Audit, AML Officer, among others.

4 ROLES AND RESPONSIBILITIES

Role	Responsibilities
Global AML Director	<ul style="list-style-type: none"> • Development and implementation of an effective AML and regulatory compliance program for the entire enterprise, with minimum required AML elements to Millicom’s businesses, including, but not limited to, the MFS and Telco business. • Serves as liaison with the MFS regional team in the development and implementation of new products and services, to ensure alignment with country’s AML regulatory requirements. • Develops, updates, and provides AML training at a global level, including in-person, remote, and workshops. • Operates as the MFS group Global AML Officer. • Conducts AML Reviews to operations AML Programs based on the Global AML Review schedule (regular AML reviews, follow-up AML reviews, special circumstances AML reviews, and discovery AML reviews). • Informs Ethics & Compliance EVP/VP of potential AML issues identified in the region during multiple AML-related controls and oversight exercises. • Presents AML-related information to Millicom’s Board of Directors and Executive Committee. • Develops, implements, and conducts additional oversight of country’s AML Programs controls AML risk reviews, Regional AML/MFS committees, and ad-hock upper management meetings. • Provides support to multiple business areas to ensure strong and sound Anti Money Laundering and Know Your Customer policies are implemented, as well as performing ongoing oversight with compliance requirements with local AML regulations. • Performs ongoing review of AML risk mitigation controls at a global level to ensure improvements are implemented to increase efficacy.

Role	Responsibilities
	<ul style="list-style-type: none"> • Shares AML best practices with all MFS operations through in-person and/or remote interactions with operations AML and upper management personnel. • Performs oversight of internal, external, and regulatory audits to ensure findings are resolved within the regulatory-provided time frame. • Provides guidance to key MFS stakeholders to ensure compliance with country’s AML regulatory requirements regarding communications with local regulators. • Participates in the selection and appointment of country’s Local AML Officers, providing support and input during the interview process. • Collaborates with MFS Technical stakeholders in the development and implementation of new AML controls technologies. • Elaborates Global AML controls and guidance playbooks. • Updates Millicom’s AML related policies and procedures.
<p>AML Regional AML Program Manager</p>	<ul style="list-style-type: none"> • Conduct local AML Program reviews for MFS and Telco (regulated countries). • Assess and analyze information and documentation gathered prior, during, and post AML Program Reviews to identify any AML gaps and provide recommendations to the local operation. • Provides ongoing oversight to action plans identified during AML Program Reviews. • Communicates to local AML teams, local upper management teams, and global AML teams the results of the AML Program Reviews. <p>Escalates issues to Global AML and local upper management teams AML-related issues through multiple channels of communication, including Regional AML/MFS Committee, direct electronic communication (e-mail).</p> <ul style="list-style-type: none"> • Provides AML training (general aspects AML) to local operations. • Provides support to operations with AML regulatory issues (as required). • Obtains statistical information from LAMLOs, regarding operation’s Know Your Customer, Know Your Agent, and Know Your Dealer compliance. • Provides support to the Global AML Director.
<p>AML Risk Manager</p>	<ul style="list-style-type: none"> • Conduct local AML Program reviews for MFS and Telco (regulated countries) related to transaction monitoring, AML risk, AML training, audits. • Assess and analyze information and documentation gathered prior, during, and post AML Program Reviews to identify any AML gaps and provide recommendations to the local operation. • Provides ongoing oversight to action plans identified during AML Program Reviews. • Communicates to local AML teams, local upper management teams, and global AML teams the results of the AML Program Reviews. • Escalates issues to Global AML and local upper management teams AML-related issues through multiple channels of communication, including Regional AML/MFS Committee, direct electronic communication (e-mail). • Provides necessary AML Risk related training and support to local operations. • Provides operation’s on-site /remote support with the Regional MFS Technical Team in the implementation of Transaction Monitoring tools/systems.

Role	Responsibilities
	<ul style="list-style-type: none"> • Conducts oversight of operations with compliance requirements of Millicom’s global AML KPI’s. • Conducts oversight of annual global AML training schedules and activities with Millicom’s Compliance teams. • Provides statistical information to the Global AML Director of operation’s Transaction Monitoring, AML Risk, training, audits status. • Works directly with the Regional MFS Technical Team in the resolution of Transaction Monitoring issues in the region.
<p>Local AML Officer (LAMLO)</p>	<ul style="list-style-type: none"> • Ensures processes and procedures are in place to comply with local AML regulatory requirements. • Elaborates and updates local AML Policies and Procedures in line with local regulatory requirements. • Elaborates and updates local AML Risk Matrix with the variables required by local AML regulations, as well as those related to the product and services offered in the operation. • Conduct ongoing oversight of local AML regulatory compliance. • Elaborates, plan, and schedule ongoing AML training to the operation’s personnel, including agents, dealers, and merchants. • Analyze and implement action plans of internal, external, and/or regulatory AML audits. • Serves as a liaison between the company and the regulator for AML matters. • Organizes quarterly (or as required by local regulations) local AML Committees, in compliance with local regulatory requirements. • Participates in Regional AML/MFS Committees. • Manages the AML team regarding the transaction monitoring and suspicious activity reporting activities. • Communicates AML issues to the Regional and Global AML teams, composed by the Global AML Director and the Regional AML Program Manager.
<p>MFS HQ Senior Management (Tigo Money GM/CFO/Fraud Director/AML Director)</p>	<ul style="list-style-type: none"> • Responsible for the escalation and information sharing with the Global AML Director and/or the Regional AML Team the results of local regulatory, internal, and external AML audits identified in each operation. • Elaboration of a documented and formal process for the validation and sign-off of the Global AML Director of new MFS/Tigo Money products/services when these products and/or services require compliance of a local AML regulation and/or law. • Participation in the quarterly Regional AML/MFS Committee.
<p>MFS HQ IT Team</p>	<ul style="list-style-type: none"> • New AML-related I.T. systems shall be shared with the Global AML Team for review and approval. • Information sharing regarding IT/system implementations impacting AML activities with relevant stakeholders (MFS regional, local MFS teams, local AML officers, Global AML team) to ensure alignment and support in its effective implementation. • Participation in the quarterly Regional AML Committee.

Role	Responsibilities
	<ul style="list-style-type: none"> Information sharing regarding the status of AML IT projects, including roadmaps, issues, gaps, detailed activities, etc. Responsible for the adequate operation and performance of the in-house transaction monitor tool.
Regional AML/MFS Committee	<ul style="list-style-type: none"> Composed of members of the Global AML Team, the MFS management team, and local AML teams (Local AML Officers). The purpose of the AML/MFS Committee is to create synergy between the two organizations and contribute to an efficient operation. Information shared during the committees include, but is not limited to statistics regarding transaction monitoring, audits action plans and status, regulatory changes, AML Reviews status, among others. Members of the Committee have voting rights, when and if applicable. The committee is held quarterly.
Global AML Team	<ul style="list-style-type: none"> Composed by the Global AML Director, the Regional AML Program Manager, and the AML Risk Manager.

5 POLICY REQUIREMENTS

5.1 AML Program Elements

- To face the risks of the digital era, the components of the AML Program Strategy must be strengthened in the same way that the environment and its risks evolve.



5.1.1 Know Your Customer Program

Minimum Standards. All Millicom’s operations must establish written guidelines and procedures to comply with local KYC AML regulatory requirements. Millicom requires all MFS and Telco customers, dealers/agents, merchants, and/or any other third party involved in a commercial agreement with both MFS and Telco operations to be identified based on local KYC requirements.

For more information on country specific KYC minimum requirements, please refer to local AML/CTF manual or policy.

5.1.2 Training and Communication Awareness

AML training is a key component of Millicom’s Global AML program. AML training includes, but is not limited to Employees, AML department staff, dealers, and agents. Depending on the audience, the AML training content can include definitions of key terms, practical examples of money laundering and terrorist financing activities, AML statutory requirements, and issues escalation process.

The LAMLOs will develop and conduct AML training at least on an annual basis, or as required by local AML regulations. Topics can include identification requirements and related obligations to which Millicom’s operations are subject to in local jurisdictions. LAMLOs must accurately track training efforts consistent with the company’s record retention requirements. For more information on Training, Communication and Awareness, please refer to local AML/CTF manuals/policy.

5.1.3 Risk Analysis and Transaction Monitoring

An effective risk assessment process is essential to identify and address the company’s AML program risks. Assessments are conducted on an ongoing basis by the Global AML team via multiple control processes, including local AML Program reviews and local Transaction Monitoring reviews. Results of the assessments are shared with Millicom’s Ethics and Compliance upper management team, MFS upper management team, local AML teams, and additional required stakeholders (responsible for non-AML processes, such as the commercial team, I.T. team, etc.). Depending on the finding or recommendation, members of the above-mentioned teams are required to provide action plans to resolve or close the finding and to mitigate identified risks.

Transaction Monitoring. Operations with MFS business shall have written guidelines and procedures regarding transaction monitoring. Also, operations must implement an automated transaction monitoring system to ensure ongoing monitoring of transactions is performed to effectively detect unusual activities and to comply with local AML regulatory requirements.

Reporting Suspicious Transactions (SARs). LAMLOs must report unusual or suspicious activities following local regulatory requirements and time frames. LAMLOs must keep customer and dealer/agent information regarding the unusual transactional activity confidential and shall not share such information with external parties, except when explicitly required by the local regulations.

Record Retention. Local operations should maintain records according to local AML regulatory requirements, or at least for a period of five years, whichever is greater.

For specific country requirements or information on risk analysis and transaction monitoring, please refer to the local AML/CTF manual/policy.

5.1.4 Millicom's AML Reviews

Local AML programs must be reviewed on an ongoing basis, taking a risk-based approach. Operations identified as high-risk for identified issues with their AML program, may be subject to increased reviews, on an ongoing basis, until AML issues are resolved, including by implementing action plans and/or closing high-risk AML findings. The Global AML team must conduct such reviews.

Findings and recommendations resulting from AML Reviews will be formally communicated to the local AML team, local upper management team, HQ MFS upper management team, Millicom's Ethics and Compliance upper management team, Global AML Director, Regional AML- MFS Committee members, and Millicom's Board of Directors (in a summarized version).

5.1.6 Staffing

All of Millicom's operations must ensure AML departments are appropriately staffed considering the size and complexity of the operation to effectively mitigate AML/CTF risks. Local AML Officers are responsible for analyzing workload and ensuring the operation is sufficiently staffed to mitigate AML risks. The Global and/or Regional AML Team will set company AML strategy and, while performing ongoing AML Reviews, will identify risk areas and provide recommendations based on specific issues affecting the performance of the local AML team. These activities include non-AML related activities and/or responsibilities that could affect an effective risk mitigation effort.

5.1.7 MFS New Products and Services

New products and/or services may be subject to local regulatory requirements. Therefore, it is mandatory that the Global AML team is informed during the initial phases or planning of new products and services, with the objective of analyzing regulatory requirements and preventing non-compliance with AML-related regulatory requirements.

The development plans of new products and services in local operations and MFS HQ team shall include the following process:

- The Local AML Officer must be informed by the Commercial or Product Development MFS Team and be included in initial discussions of developments of new products and services.
 - o The commercial team or responsible parties in the product and/or service development must provide detailed information regarding the product, implementation timeline, including target dates and personnel roles and responsibilities in this process.
- The Local AML Officer must perform a regulatory AML analysis to inquire about the potential applicability of local AML regulatory requirements of the new product or service.
- The Local AML Officer must inform the Regional AML team and/or the Global AML Director about the new product and/or service to be launched, including:
 - o Product details, including purpose, timeline, stakeholders, target users, and AML Regulatory applicability.
- The Global AML Director will share the new product and/or services information, plans, and status with Millicom's EVP Ethics and Compliance, VP Ethics and Compliance, and/or Millicom's Board of Directors for review and feedback.

- The Global AML team, and the Local AML Officer will provide feedback, recommendation, and regulatory requirement information to the appropriate stakeholders during the new product and/or services deployment and implementation process.

5.1.8 Audits

Millicom MFS and Telco operations are subject to multiple AML audits, including internal, external, and regulatory. In the events of being subject to these types of audits, LAMLOs must:

- Immediately inform the Global AML team when the operation is subject to an AML audit (internal, external, or regulatory).
- Prioritized action plans on findings, especially those resulting from a regulatory audit, which poses a higher risk for the organization.
- Provide details of the AML audit, such as:
 - o Type of audit (internal, external, or regulatory).
 - o Date of the audit.
 - o Documentation request details.
 - o Length of the expected audit.
 - o Any additional relevant information.
- The LAMLO must keep a tracking document of relevant findings and action plans, including, but not limited to, the following details:
 - o Finding details.
 - o Responsible party/stakeholder/department of elaborating and implementing the action plan.
 - o Date of expected resolution.
- The LAMLO must, on an ongoing basis (at least monthly), share the above-mentioned information with the AML Risk Manager.
- The Regional AML Risk Manager will provide the updated status of the AML audits to the Regional AML/MFS Committee.
- The LAMLO must share audit responses and audits action plan status with the Global AML Risk Manager

5.1.9 AML Regulatory Communications

AML matters communications between the MFS business and local regulators must be informed and shared with Local AML Officers and the Global AML Team as soon as they are received.

Under no circumstances shall non-AML related stakeholders provide responses to local regulators prior review by local regulatory/legal team, local AML team, and Global AML Team.

Circumstances in which local regulatory teams must inform and share information with the Global AML team relating regulatory AML matters include, but limited to:

- AML-related regulatory requests.
- AML-related regulatory changes.
- AML-related regulatory examinations.
- Responses provided by local non-AML stakeholders regarding AML matters.

6 COMMUNICATION OF AML INFORMATION TO MILLICOM’S BOARD OF DIRECTORS AND EXECUTIVE COMMITTEE

6.1 The Global AML Director will share related information with Millicom’s Board of Directors and Executive Committee in regular respective meetings. The presentation will include relevant AML program information such as the following:

- a. AML Reviews: status and/issues of AML reviews performed in operations as part of the annual AML Review schedule.
- b. New products and services: regulatory issues with the implementation of new products and/or services (when applicable).
- c. Statistical information: KYC/KYA/KYD compliance data, transaction monitoring data (alerts, SAR’s, customers alerted).
- d. Internal/External/Regulatory audits: status regarding internal, external, or regulatory audits.
- e. AML Training status.

7 LOCAL AML POLICIES/MANUALS

7.1 As referenced in most topics in this document, below are links to all the local AML Policies and/or Manuals for reference:

COUNTRY	LINK TO AML POLICY/MANUAL
PARAGUAY	<ul style="list-style-type: none"> • https://protection.greathorn.com/services/v2/lookupUrl/6763d975-f1d5-4d80-87c2-4d168351eaae/222/a77191658984270613d7334e717234f72d754dcf?domain=millicom.sharepoint.com&path=/sites/ep-tigopy/Documents/Forms/AllItems.aspx
HONDURAS	<ul style="list-style-type: none"> • https://protection.greathorn.com/services/v2/lookupUrl/5450a10b-4fe8-4912-ad73-661fe14ce5aa/222/920b7a220eddae633ae00d3142201bdb5265bd75?domain=millicom.sharepoint.com&path=/sites/UnidadCumplimientoyRiesgosMFS • https://protection.greathorn.com/services/v2/lookupUrl/d859af3e-33d2-4d37-9ddd-e2a075dc08b2/222/920b7a220eddae633ae00d3142201bdb5265bd75?domain=millicom.sharepoint.com&path=/:f:/r/sites/UnidadCumplimientoyRiesgosMFS/Documentos%20compartidos/Manuales,%20politicas,%20procesos%20y%20procedimientos%20DINELSA%20vigentes%202023 • https://protection.greathorn.com/services/v2/lookupUrl/6fde7f51-441d-4619-b4a7-1e1a25992b0f/222/920b7a220eddae633ae00d3142201bdb5265bd75?domain=millicom.sharepoint.com&path=/:b:/r/sites/UnidadCumplimientoyRiesgosMFS/Documentos%20compartidos/Programa%20de%20Cumplimiento%20DINELSA%20Versión%205%20(Abril%202023).pdf
GUATEMALA	<ul style="list-style-type: none"> • http://tigospace/FMS/Documentos%20compartidos/MANUAL%20DE%20CUMPLIMIENTO%202021.pdf

BOLIVIA	<ul style="list-style-type: none"> https://protection.greathorn.com/services/v2/lookupUrl/65197cae-44bc-464b-91a4-22d693fbedb2/222/3ac57bb0a4b9000bf3aa69710ea53a30462e4585?domain=millicom.sharepoint.com&path=/sites/procesosbolivia/bpcxpoliticas/procedimientospoliticas/Forms/DocumentosAprobados.aspx
PANAMA	
EL SALVADOR Telco	<ul style="list-style-type: none"> https://millicom.sharepoint.com/sites/GerenciadeCumplimientoAML-Telco/Documentos%20compartidos/Forms/AllItems.aspx?id=%2Fsites%2FGerenciadeCumplimientoAML%2DTelco%2FDocumentos%20compartidos%2F1%2E%20Pol%C3%ADticas%20y%20Procedimiento%2FManual%20de%20PLDFT%2F2023&p=true&ga=1

8 EXCEPTIONS

Where a local operation is unable to comply with this Global Policy, the Global AML Director must pre-approve the exception in writing according to the provisions herein. Any deviation from this policy can be included in local policies or annexes to this global policy, only after approval by the Global AML Director.

9 ENFORCEMENTS

Under no circumstances should a Millicom employee violate this Policy or its related Policies. We have zero tolerance for knowingly facilitating financial crimes, including money laundering or terrorism financing. Any employee found to violate this provision will be subject to disciplinary action, up to and including termination of employment.

10 POLICY COMPLIANCE

The Global AML Policy is distributed to all operations. LAMLOs will be responsible for the distribution of this Policy in local operations and shall provide confirmation to the Global AML Director that the Policy has been distributed locally.

The Global AML team ensures compliance with the Global AML Policy thanks to multiple control activities performed by the team, including AML Reviews and assessment to local AML Programs (which include assessment of each element of the local AML Program and comparison with local regulatory requirements), and AML Transaction Monitoring control activities (which include assessment and testing of transaction monitoring systems, processes, and procedures).

11 DOCUMENT REVIEW

Reviewed by	Role	Date
Salvador Escalon	EVP Ethics and Compliance	05-SEP-2023
Cara Viglucci	VP Ethics and Compliance	05-SEP-2023

12 REVISION HISTORY

Version #	Description	Author	Date
1	Policy update	Jose Medinanazer	01-NOV-2021
2	Policy update	Jose Medinanazer	01-FEB-2022
3	Policy update	Jose Medinanazer	23-AUG-2023

13 NREFERENCES

13.1 Documents

Document	Description
AML local Regulations	AML local Regulations
FATF	Financial Action Task Force
OFAC	Office of Foreign Asset Controls
LOCAL AML Polices/Manuals	Local AML Policies

13.2 Controls

Control	Description
AML Review Sheet	On-site AML review tool to assess local AML Program’s compliance.
AML Transaction Monitoring Review Sheet	On-site AML review tool to assess local transaction monitoring systems and processes.

13.3 Risks

Risk	Description
Risk.GCR.026 Money Laundering Risk	The risk of materialization of money laundering. The likelihood of actual money laundering cases occurring remains low due to limits established in all operations by regulatory entities, in transactional value and quantity of transactions. All operations perform analysis and identification of unusual activities thanks to transaction monitoring systems. In cases of unusual activities resulted from transaction analysis (the final determination of actual money laundering is conducted by regulatory entities, not by Tigo operations), are reported to local regulatory entities.
Risk.GCR.024 MFS Regulatory Compliance	Noncompliance with local AML laws and regulations can have a negative impact to the MFS business, not only financially in the form of fines, but mostly reputational. At the same time, non-compliance with local regulatory requirements may lead to increased scrutiny by local regulatory entities to the operations overall AML program efficiency, therefore, increased costs to implement or expand current controls as a direct result of increased regulatory oversight.
Risk.GCR.032 Non-compliance with KYC rules and regulations - LATAM	– Lack of controls or process in operations that all locally regulatory required KYC information is captured/obtained at the time of onboarding, or shortly thereafter, could represent a financial and/or reputational risk. In cases of re-incidences can result in increased regulatory oversight, scrutiny to the operation's AML program, and additional control requests.

13.4 Tools

Tool	Description
AML Reviews	Ongoing AML reviews to operation's AML Programs compliance, including all the elements of the program.
AML Transaction Monitoring Review	Ongoing AML review to operation's transaction monitoring systems, including alerts, suspicious activity reports, and statistical information.

14 APPENDICES

Document	Description
AML Review - AML Risk Reviews	AML Review – AML Risk Reviews Playbook
MFS AML Committee Manual	MFS AML Committees Playbook