Money Services Business Duty to Inform

Money Services Businesses are at potentially higher risk of being used by bad actors to facilitate money laundering and/or terrorist financing. Financial institutions serving MSBs are required to take certain actions to mitigate their risk in servicing such potentially higher risk businesses. As a condition to account opening / retention, the MSB is being required to:

- Proactively notify the credit union in writing within 30 days of reportable events
- Certify annually by each December 31 whether any reportable events have or have not occurred.

Regardless of whether also communicated to the credit union in conversation or by other means, notice to the credit union must be given in writing with physical copy delivered to:

Platinum Federal Credit Union
Attention: Compliance Department
4794 Lawrenceville Hwy NW
Lilburn, GA  30047

While not intended to be exhaustive, “Reportable Events” include:

- Indictment and/or prosecution against the Company, any Director or Officer.
- Regulatory disciplinary action against the Company, any Director or Officer.
- Licensing application denied by a State or the District of Columbia.
- Change of control or ownership
- Expanding financial products / services available to members
- Change in key business relationships, e.g. switching principal money transmitters
- Change in named BSA/AML Compliance Officer
- Change in the manner / purpose with which credit union account(s) / relationship will be used

Any event that may reasonably impact potential risk to the credit union in serving the business is expected to be proactively disclosed; the credit union’s MSB member has a duty to inform as condition of account opening / maintenance. While the occurrences of a reportable event will not in and of itself result in action to close an account relationship, each MSB is expected to take prompt, appropriate corrective action to mitigate its risks. If issues are not addressed promptly to the credit union’s satisfaction, action may be taken to sever the relationship.

ATTESTATION
By signing below, I hereby certify that the Business will (or the undersigned will cause the business to) provide notice promptly in the manner instructed. I understand the Credit union is under no obligation to establish and/or maintain a relationship and may, in its sole discretion, choose whether to permit the establishment and ongoing maintenance of an account relationship. While providing the required written notices does not guarantee the retention of any account(s) and/or service(s) relationship for the Business, failure to provide timely, accurate notification may result in disciplinary action such as increased oversight, imposition of higher fees or termination of the account relationship.

☐ Initial attestation upon requesting establishment of account relationship.
☐ Annual Certification by December 31
  ☐ NO reportable events have occurred during the prior year.
  ☐ YES; reportable events occurred but were not previously reported (details attached).
  ☐ YES; reportable events occurred and were properly reported in writing (copy attached).

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<th>Printed Name:</th>
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