



## Anti-Money Laundering & Asset Blocking Policy

### I. STATEMENT OF POLICY

Daiwa Capital Markets America Inc. ("DCMA" or the "firm") and its senior management are firmly committed to compliance with all laws, rules and regulations relating to combating money laundering, including those rules and regulations requiring the reporting of currency transactions, certain monetary instruments and suspicious activity. As a registered broker-dealer and futures commission merchant, DCMA is subject to numerous anti-money laundering and asset freezing statutes, rules and regulations. DCMA's policy is to comply fully with all of these requirements and to cooperate fully with all governmental instructions regarding these subjects. The key imperatives, which are discussed more completely in DCMA's detailed policies and procedures, may be summarized as follows.

1. **DCMA does not transfer or permit the withdrawal of any funds or other assets we 'know' to be the proceeds of some form of unlawful activity.** For this purpose, "knowing" includes having enough facts to reach a reasonable conclusion; certainty is not required, and "turning a blind eye" is not permissible.
2. **We are alert to suspicious activity suggestive of possible money laundering, and file Suspicious Activity Reports (SARs) when warranted.** SARs will be filed on a confidential basis, without notifying the non-Daiwa parties involved.
3. **We freeze and block the transfer of any assets identified with persons or entities on the US Government's (OFAC) list of designated persons or entities subject to asset freezing restrictions.** To comply with these rules, we review names associated with new and existing accounts, wire transfers and payments against the designated person lists.
4. **DCMA does not accept currency deposits or make payments in currency.** In the unlikely event that an exception to this policy is made, we will file currency transaction reports for any transaction, or series of transactions, equal to or exceeding \$10,000 or appearing to be part of a larger set of transactions equaling or exceeding \$10,000.
5. **DCMA maintains records containing detailed information regarding all transfers of funds into or out of the firm.** The "travel rules" require such information for all transfers, including checks and wires, with some exceptions, and require a five year retention.
6. **We conduct annual internal training sessions and an annual independent audit to promote and assess compliance with these policies and procedures.**
7. **DCMA's ongoing customer due diligence is risk-based including the nature and purpose of customer relationships for development of a customer risk profile, ongoing monitoring to identify and report suspicious transactions, and maintaining and updating customer information. Customer information shall include beneficial owners of legal entity customers.**

All employees are required to know this policy and related procedures. All employees are required to report violations, suspected violations or suspicious activity to their supervisor or directly to the Chief AML Officer, the Compliance or Legal Departments. Supervisors, in turn, are required to report such matters to a member of the Chief AML Officer or to the Chief Compliance or Chief Legal Officer.

Employees who violate these procedures may be subject to severe penalties, including discipline and dismissal.



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#### Certified AML Officer Designation

DCMA has designated the individual identified below, as its Chief Anti-money Laundering Officer (“Certified AML Officer”) .The Compliance Department promptly updates the FINRA and other SRO contact systems when the designation of the Certified AML Officer changes.

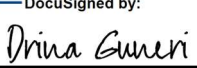
**DCMA has designated Drina Guneri as Chief AML Officer effective January 11, 2021.**

#### Senior Management Approval of Policies

I, Mr. Keiji Machida, the Chief Executive Officer of DCMA, confirm having received, reviewed, and approved a copy of the document titled ANTI-MONEY LAUNDERING AND ASSET BLOCKING POLICIES.

**Print Name:** Keiji Machida      **Signature:** S/       **Date:** May 25, 2023  
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I, Drina Guneri, an Executive Director of DCMA and DCMA’s Certified AML Officer, confirm having received, reviewed, and approved a copy of the document titled ANTI-MONEY LAUNDERING AND ASSET BLOCKING POLICIES.

**Print Name:** Drina Guneri      **Signature:** S/       **Date:** May 25, 2023  
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