

Statement of Compliance with the Bank Secrecy Act (BSA) and the Office of Foreign Assets Control (OFAC) Regulations

2025

Alloya Corporate FCU (“Alloya”) is a chartered corporate credit union regulated by the National Credit Union Administration (NCUA). As such, it adheres to 12 CFR 748.2, which mandates federally insured credit unions to establish and maintain a BSA Compliance program. Alloya’s BSA Compliance program encompasses the following essential attributes:

- **Internal Controls:** A robust system of internal controls to ensure ongoing compliance.
- **Independent Testing:** Regular independent testing for compliance, conducted by Alloya’s Internal Audit team or an external party.
- **Designated Compliance Officers:** Appointment of an individual or individuals responsible for coordinating and monitoring day-to-day compliance activities.
- **Training:** Comprehensive training programs for relevant personnel.
- **Customer Due Diligence (CDD):** Conducting CDD for members and Beneficial Owners, including understanding the nature and purpose of the relationship and ongoing risk-based monitoring.

Alloya integrates its OFAC compliance efforts within the BSA Compliance program. This includes screening all individuals, entities, and miscellaneous instructions within funds transfer instructions against vendor-provided OFAC SDN, Non-SDN (including FSE List, SSI List, etc.), and Sanctioned Country listings. Any rejected or blocked transactions are reported to OFAC within the required regulatory timeframe. It is important to note that Alloya’s interdiction screening process does not absolve natural person credit unions of their OFAC compliance responsibilities.

The BSA Compliance program at Alloya is subject to periodic examination by the NCUA.

For inquiries regarding Alloya’s BSA Compliance program, please email Compliance@alloyacorp.org.

Sincerely,

Lindsay Larson, ACPB, CRC, CCFC
AVP, BSA Officer
Alloya Corporate FCU