

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

**2026**

Alloya Corporate FCU (“Alloya”) is a chartered corporate credit union regulated by the National Credit Union Administration (NCUA) and, as such, complies with 12 CFR § 748.2, which requires federally insured credit unions to maintain a written program designed to ensure ongoing compliance with the Bank Secrecy Act and related Treasury regulations. Alloya’s AML/CFT & OFAC 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 incorporates OFAC compliance within its AML/CFT & OFAC Compliance Program through documented policies, internal controls, and ongoing monitoring. 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 AML/CFT & OFAC Compliance Program at Alloya is subject to periodic examination by the NCUA.

For inquiries regarding Alloya’s AML/CFT & OFAC Compliance Program, please email [Compliance@alloyacorp.org](mailto:Compliance@alloyacorp.org).

Sincerely,

**Lindsay Larson, ACPB, CRC, CCFC**  
*AVP, BSA/AML/CFT Officer*  
Alloya Corporate FCU