

AML/CTF Policy

Last Updated: Jan 6th, 2026

1. Background and Introduction

High Rollers of Saint Lucie, Inc dba FortunaRush.com is a Sweepstakes (Sweeps) merchant. The Company offers games on two separate platforms: (i) a standard, social casino format ("Standard Play Mode") which offers game play via "Gold Coin Games," and (ii) a sweepstakes-based promotional format ("Sweep Token Mode") which offers game play via "Sweep Token Games" to players in the United States (with the exception of certain states, as per legal counsel). FortunaRush.com is 100% B to C, e-commerce and utilizes the NMI gateway (PCI-L1). Merchant operates and manages his business domestically with staff and brick and mortar office in Florida.

On October 26, 2001, the USA PATRIOT Act (the "Act") became law (amending certain provisions of the Bank Secrecy Act of 1970). Section 352 of the Act requires every "financial institution" to establish an anti-money laundering (AML) program, which includes at a minimum:

- The development of internal policies, procedures, and controls
- The designation of a compliance officer
- An ongoing employee training program
- An independent audit function to test the program

2. FortunaRush.com Policy

FortunaRush.com is committed to full compliance with all applicable laws and regulations regarding Money Laundering & Terrorist Financing. FortunaRush.com consider Integrity as a key commitment on the part of the firm to uphold strict standards of ethical conduct and hence preservation of a stable value for society confidence. These policies endorse the strict compliance with the legal framework governing the prevention of money laundering and terrorism financing.

3. Key Definitions

3.1. Money Laundering

Money laundering is generally defined as engaging in acts designed to conceal or disguise the true origins of criminally derived proceeds in a way to make those proceeds appear to have been derived from legitimate origins or constitute legitimate assets. Generally, money laundering occurs in three stages.

3.2. Placement

Cash first enters the financial system at the "placement" stage, where the cash generated from criminal activities is converted into monetary instruments, such as money orders or

traveler's checks, or deposited into accounts at financial institutions.

3.3. Layering

At the "layering" stage, the funds are transferred or moved into other accounts or other financial institutions to further separate the money from its criminal origin.

3.4. Intergation

At the "integration" stage, the funds are reintroduced into the economy and used to purchase legitimate assets or to fund other criminal activities or legitimate business.

4. Customer Due Diligence Procedures

FortunaRush.com. has an established Customer Due Diligence Procedures (CDD) which requires customer to provide following information at minimum:

- Customer Full Name
- Date of Birth
- Full Address with Zip Code
- Telephone Number
- Email address

Customers who refuse any of these items will not be able to open an account.

5. Sanctions Screening

FortunaRush.com will screen customer name against OFAC list to ensure customer is not in SDN list. If there is an indication of a possible match, transaction will put on hold and reviewed by the MLCO and will only be processed, if approved by MLCO.

6. Enhanced Due Diligence Procedures

6.1. High-Risk Clients

FortunaRush.com will take enhanced measures for identifying customers, keeping records, and monitoring financial transactions in respect of the activities that pose the high risk. FortunaRush.com must periodically conduct ongoing monitoring of the business relationship with its customers based on risk. The level of monitoring which is conducted varies depending on the customer's risk assessment results.

Based on risk assessment, if there is a need for any additional information about the user or the transaction purpose, FortunaRush.com may perform enhanced due diligence which

include:

- Obtaining additional information on a client i.e. public database and the internet)
- Obtaining information on the client's source of funds or source of wealth

6.2. Politically Exposed (PEP)

Politically Exposed Persons (PEP) is defined as “a person entrusted with a prominent position that typically comes with the opportunity to influence decisions and the ability to control resources. The influence and control a PEP have, puts them in a position to impact policy decisions, institutions, and rules of procedure in the allocation of resources and finances, which can make them vulnerable to corruption.”

As part of KYC Process, FortunaRush.com is required to make the PEP determination when entering a business relationship with customers whether a person is a foreign PEP, a domestic PEP, a Head of International Organization (HIO), or a family member or close associate of one of these people. Also required to conduct periodic monitoring of business relationships and determine when a fact is detected about an existing business relationship and determine if they become a PEP or HIO, or a close associate.

FortunaRush.com will ensure the required PEPs are identified, and that CEO/CCO approval is obtained for establishing a business relationship with a PEP.

7. Roles and Responsibilities

7.1. Money Laundering Compliance Officer (MLCO) Designation and Duties

FortunaRush.com has designated Anti-Money Laundering Program Compliance Officer with full responsibility for the company's AML program. The duties of the AML Compliance Officer will include monitoring the company's compliance with AML obligations, overseeing communication, and training for Management, and employees in the areas of AML/BSA and OFAC compliance. The AML Compliance Officer will also ensure firm keeps and maintains all required AML records and will ensure Suspicious Activity Reports (SARs) are filed with the Financial Crimes Enforcement Network (FinCEN) when appropriate. Responsibilities of the MLCO include the following:

- Coordination and monitoring of FortunaRush.com day-to-day compliance with applicable Anti- Money Laundering Laws and Regulations and firm internal AntiMoney Laundering Policy and Procedures
- Conduct staff training programs for appropriate personnel related to the FortunaRush.com's anti-money laundering policy and procedures and maintaining records evidencing such trainings
- Receive and review any reports of suspicious activity from staff
- Sanction Screening of customer names before processing order to ensure compliance with OFAC and other applicable Sanctions lists
- Coordination of enhanced due diligence procedures regarding clients and respond to

both internal and external inquiries regarding FortunaRush.com AML/CFT policies and procedures

- Notify the Authority of any suspicious money laundering or financing of terrorism activity
- Report Filed With: Financial Intelligence Unit (FIU): U.S. Department of the Treasury; Local Law Enforcement: Federal Bureau of Investigation (FBI) and relevant Regulatory Authorities: U.S. Securities and Exchange Commission (SEC)

7.2. Employees

It is the policy of the firm that every member of staff shall pay attention to and report to the MLCO if any transactions made on behalf of a person whose identity has not been established or suspicious transaction.

8. Monitoring Accounts for Suspicious Activity

FortunaRush.com MLCO will monitor account activity for unusual size, volume, pattern or type of transactions, accounting for risk factors and red flags which are appropriate to our business.

On a risk-sensitive basis, we maintain and update customer information, including beneficial ownership information for legal entity customers. The customer risk profile serves as a baseline against which customer activity is assessed for suspicious transaction reporting. If suspicious activity is identified, the account may be flagged for manual review, and further actions may be taken, such as:

- Freezing the account
- Requesting additional documentation from the customer
- Escalating the issue to the Money Laundering Reporting Officer (MLRO) for further investigation

9. Suspicious Transaction Reporting (SAR) and BSA Reporting

FortunaRush.com will file a SAR with FinCEN for any transactions conducted or attempted by, at or through firm where we know, suspect, or have reason to suspect:

- The transaction involves funds derived from illegal activity or is intended or conducted to hide or disguise funds or assets derived from illegal activity as part of a plan to violate or evade federal law or regulation or to avoid any transaction reporting requirement under federal law or regulation
- The transaction is designed, whether through structuring or otherwise, to evade any requirements of the BSA regulations
- The transaction has no business or apparent lawful purpose or is not the sort in which the customer would normally be expected to engage, and after examining the background, the possible purpose of the transaction and other facts, we know of no reasonable explanation for the transaction; or

- The transaction involves the use of the firm to facilitate criminal activity
- FortunaRush.com. will retain copies of any SAR filed and the original or business record equivalent of any supporting documentation for five years from the date of filing the SAR. We will identify and maintain supporting documentation and make such information available to FinCEN, as well as any other appropriate law enforcement agencies, federal or state regulators upon request
- FortunaRush.com will not notify any person involved in the transaction, which is being reported except as permitted by BSA regulations
- Federal law (FinCEN) requires strict reporting of currency (cash or coin) transactions over \$10,000 conducted by, or on behalf of, one person, as well as multiple currency transactions that aggregate to be over \$10,000 in a single day. These transactions albeit impossible to originate on FortunaRush.com will be reported on Currency Transaction Reports (CTRs)

10. AML Recordkeeping

In accordance with AML/CFT regulations, FortunaRush.com retains detailed records of all customer information, transaction histories, and compliance-related documentation. These records are retained for a minimum of 5 years following the termination of the business relationship with a customer. Types of Records Retained:

- Customer Details: Full name, date of birth, address, contact information, and government-issued identification.
- Transaction Data: All deposits, withdrawals, and activity logs associated with sweepstakes participation.
- KYC and EDD Documentation: Proof of identity, proof of address, and any documentation related to the verification of source of funds.
- Suspicious Activity Reports: Documentation related to suspicious transactions, including the rationale for filing an STR.

11. Training Programs

Company Wide Training All employees are required to participate in a early training program which currently has the following components at minimum:

- Ethics
- Compliance Essentials
- Anti-Money Laundering
- Economic Sanctions

12. Independent Review of Compliance Program

FortunaRush.com to undertake an independent review of the compliance regime to test its effectiveness related to compliance with AML & KYC Policy. This independent effectiveness review shall include interviews, sampling, and testing of “KYC” processes, transaction monitoring and reporting, and their supervisors, to determine their knowledge of the legislative requirements and FortunaRush.com policies and procedures.

13. Periodic Review

This policy is to be reviewed on an annual basis.

Signed: _____

Syed Khalid- Compliance Officer

syedsaleem76@gmail.com

[nothing more follows]

