

# KYC / AML / CTF COMPLIANCE POLICY

*(Issuer – Regulation D Rule 506(c))*

**Effective Date:** 11-22-25

**Issued by:** TRAVALEO, LLC

**Last Review Date:** 12-25-25

## 1. PURPOSE AND REGULATORY CONTEXT

Travaleo, LLC and subsidiary TRYOI, LLC (the “Companies”) are a real estate operating company and issuer of securities that raises capital exclusively through private offerings conducted pursuant to **Regulation D, Rule 506(c)** under the U.S. Securities Act of 1933.

The Company is **not**:

- A bank or financial institution
- A broker-dealer or investment adviser
- A registered crowdfunding portal
- A cryptocurrency exchange or money transmitter

Nevertheless, the Company is committed to implementing commercially reasonable **Know Your Customer (KYC)**, **Anti-Money Laundering (AML)**, **Counter-Terrorist Financing (CTF)**, and **Sanctions Compliance** controls consistent with applicable U.S. laws, including:

- The Bank Secrecy Act (BSA)
- The USA PATRIOT Act
- FinCEN guidance applicable to issuers and capital-raising entities
- Sanctions programs administered by the U.S. Department of the Treasury

This Policy forms part of the Company’s broader AML/CTF Compliance Program and is designed to prevent the misuse of the Company’s platform or securities offerings for illicit financial activity.

## 2. SCOPE AND APPLICABILITY

This Policy applies to:

- All investors participating in the Company’s private securities offerings
- All users accessing the Company’s capital-raising or investor-relations platform
- Officers, directors, employees, and contractors involved in onboarding, compliance, finance, or investor communications
- Third-party service providers engaged to perform identity verification, AML screening, or related compliance services

### 3. COMPLIANCE GOVERNANCE

#### 3.1 Designated Compliance Officer

The Company has designated its **legal counsel** to serve as Compliance Officer for purposes of AML, KYC, CTF, and sanctions oversight.

- **Compliance Officer:** Stephen Czarnik
- **Role:** Legal Counsel & AML Compliance Officer
- **Responsibilities:**
  - Oversight of the Company's AML/KYC Program
  - Review and escalation of compliance matters
  - Coordination with third-party verification providers
  - Advising senior management on compliance risks

The Compliance Officer reports directly to **Senior Management and/or the Board of Directors**.

This designation is an internal governance matter and is **not intended as a public-facing disclosure**.

#### 3.2 Board and Senior Management Oversight

Senior Management and/or the Board of Directors maintain ultimate responsibility for AML/CTF compliance and:

- Approve this Policy upon adoption
- Review the AML Program at least annually
- Authorize remediation actions when deficiencies are identified

### 4. CUSTOMER IDENTIFICATION PROGRAM (CIP)

Prior to accepting any investment or onboarding any investor, the Company requires completion of identity verification procedures consistent with Rule 506(c) accredited investor verification standards and AML best practices.

#### 4.1 Individual Investors

The Company collects and verifies, directly or via third-party providers:

- Full legal name
- Residential address (no P.O. Boxes)
- Date of birth
- Government-issued identification (passport or driver's license)
- Tax identification number (SSN or equivalent, where applicable)
- Biometric or liveness verification, where supported

#### 4.2 Entity Investors

For legal entities, the Company collects:

- Formation and organizational documents
- Employer Identification Number (EIN) or equivalent
- Ownership and control structure
- Identification and verification of **beneficial owners** holding:
  - $\geq 25\%$  ownership (or  $\geq 10\%$  where applicable), and
  - All controlling persons and authorized signatories

## 5. THIRD-PARTY KYC / AML SERVICE PROVIDERS

The Company relies on reputable third-party service providers to perform identity verification, sanctions screening, and AML checks, including but not limited to:

- **Sumsu** or comparable investor verification providers

These providers perform:

- Identity verification
- Sanctions and watchlist screening
- Politically Exposed Person (PEP) checks
- Adverse media screening

Ultimate responsibility for compliance oversight remains with the Company.

## 6. RISK-BASED AML APPROACH

The Company applies a **risk-based approach** to investor onboarding and monitoring, considering:

- Investor type (individual vs. entity)
- Jurisdiction of residence or incorporation
- Source of funds
- Transaction behavior and size

### 6.1 Enhanced Due Diligence (EDD)

Enhanced Due Diligence may be applied to higher-risk profiles, including:

- Politically Exposed Persons (PEPs), their relatives, and close associates
- Investors from higher-risk jurisdictions
- Complex ownership structures
- Unusual or inconsistent investment behavior

## 7. SANCTIONS, PEP, AND ADVERSE MEDIA SCREENING

The Company screens investors against applicable sanctions and watchlists, including:

- U.S. Office of Foreign Assets Control (OFAC)
- United Nations sanctions lists
- European Union consolidated sanctions lists
- Other applicable international sanctions regimes

The Company prohibits participation by any person or entity subject to applicable sanctions.

## 8. TRANSACTION MONITORING

Given the Company's role as an issuer and not a financial intermediary:

- Monitoring focuses on investment subscriptions, capital inflows, and redemptions (if any)
- Reviews are conducted using a combination of **automated alerts and manual review**
- Blockchain analytics may be used where digital assets are involved

Transactions that appear suspicious or inconsistent with an investor's profile are escalated to the Compliance Officer.

## 9. SUSPICIOUS ACTIVITY ESCALATION

If potential suspicious activity is identified:

1. The matter is escalated to the Compliance Officer
2. Additional information may be requested
3. Legal counsel determines whether further action is required

Where applicable, the Company will comply with any legal obligation to report suspicious activity to relevant authorities.

## 10. RECORDKEEPING

The Company retains KYC, AML, and transaction records for **at least five (5) years** from the date of the last investor interaction, in accordance with applicable U.S. record retention requirements.

## 11. TRAINING AND AWARENESS

Employees and contractors involved in investor onboarding or financial operations receive AML/KYC awareness training upon onboarding and periodically thereafter. Training records are maintained internally.

## 12. OUTSOURCING AND VENDOR OVERSIGHT

The Company conducts reasonable due diligence on third-party compliance vendors and maintains oversight to ensure services are performed in accordance with this Policy.

## 13. POLICY REVIEW AND UPDATES

This Policy is reviewed **at least annually** and updated as necessary to reflect:

- Changes in regulatory guidance
- Business model changes
- Identified compliance risks

**Approved by:**

Senior Management / Board of Directors

By:  \_\_\_\_\_

Oscar Brito

12-22-25

CEO and Chairman of the Board of Directors