

Kellogg Holdings LLC

Anti-Money Laundering (AML) and Know Your Customer (KYC) Compliance Program

Effective Date: January 1, 2026

Company: Kellogg Holdings LLC

Principal Place of Business: Birmingham, Alabama

Compliance Officer: Travis Kellogg

1. Purpose

This document outlines the Anti-Money Laundering (AML) and Know Your Customer (KYC) policies and procedures implemented by Kellogg Holdings LLC to comply with the requirements of:

- The **Bank Secrecy Act (BSA)**
- The **USA PATRIOT Act**
- **FinCEN regulations applicable to Money Services Businesses (MSBs)**
- Applicable federal and state laws governing financial transactions

The purpose of this program is to prevent the use of Kellogg Holdings LLC's services for:

- Money laundering
- Terrorist financing
- Fraud
- Sanctions violations
- Other illicit financial activity

Kellogg Holdings LLC maintains internal procedures designed to identify customers, monitor transactions, and ensure compliance with applicable regulatory obligations.

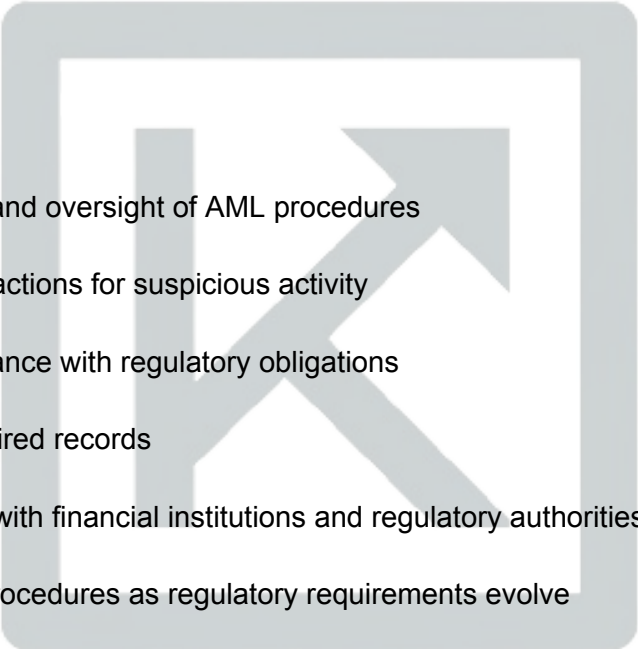
2. Designation of Compliance Officer

Kellogg Holdings LLC has designated a Compliance Officer responsible for the administration and oversight of the AML/KYC program.

Compliance Officer

Travis Kellogg
Kellogg Holdings LLC
Phone: (205) 202-1093

Responsibilities include:

- Implementation and oversight of AML procedures
 - Monitoring transactions for suspicious activity
 - Ensuring compliance with regulatory obligations
 - Maintaining required records
 - Communicating with financial institutions and regulatory authorities when necessary
 - Updating AML procedures as regulatory requirements evolve
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3. Customer Identification Program (KYC)

Kellogg Holdings LLC maintains a Customer Identification Program designed to verify the identity of customers prior to conducting transactions.

Customers may be required to provide:

- Full legal name

- Residential address
- Date of birth (for individuals)
- Government-issued identification
- Contact information

Acceptable forms of identification include:

- Passport
- Driver's license
- National identification card
- Other government-issued identification

Identification documents are reviewed to confirm the identity of the customer before transactions are completed.

4. Customer Due Diligence

Kellogg Holdings LLC conducts reasonable due diligence on customers prior to executing transactions.

This process includes:

- Verification of customer identity
- Review of transaction purpose
- Confirmation that funds originate from legitimate sources

Customers may be asked to provide information regarding:

- Source of funds

- Purpose of the transaction
- Nature of the customer's financial activity

Direct communication with customers is often used to verify the legitimacy of transactions and confirm that funds originate from lawful activities.

5. Enhanced Due Diligence

Enhanced due diligence may be conducted in situations where elevated risk is present.

Examples include:

- Large transaction volumes
- High-risk jurisdictions
- Unusual transaction patterns
- Transactions involving politically exposed persons (PEPs)

Additional documentation or verification may be requested before proceeding with such transactions.

6. Transaction Monitoring

Transactions are reviewed to identify potentially suspicious activity.

Monitoring includes:

- Reviewing transaction size and frequency
- Identifying unusual transaction patterns
- Monitoring for activity inconsistent with the customer's stated purpose

Transactions that appear inconsistent with normal financial behavior may be subject to additional review.

7. Suspicious Activity Reporting

If Kellogg Holdings LLC identifies activity that appears suspicious or indicative of illegal activity, appropriate steps may be taken including:

- Refusing or delaying the transaction
- Requesting additional information from the customer
- Filing a Suspicious Activity Report (SAR) when required by law

All suspicious activity reviews are documented internally.

8. Sanctions Screening

Kellogg Holdings LLC takes reasonable measures to ensure compliance with U.S. sanctions laws.

Customers and counterparties may be screened against:

- **OFAC sanctions lists**
- Other relevant government watchlists

Transactions involving sanctioned individuals or entities are prohibited.

9. Recordkeeping

Kellogg Holdings LLC maintains records relating to customer identification and transactions as required by applicable regulations.

Records may include:

- Identification documents
- Transaction details
- Customer communications
- Due diligence documentation

These records are maintained securely and retained for the period required by law.

10. Internal Controls

Kellogg Holdings LLC maintains internal controls designed to ensure compliance with AML requirements.

These controls include:

- Customer verification procedures
- Transaction monitoring practices
- Documentation and recordkeeping standards
- Compliance oversight by the designated Compliance Officer

These controls are reviewed periodically and updated as necessary.

11. Independent Review

The AML compliance program may be periodically reviewed to ensure effectiveness and compliance with regulatory standards.

Reviews may include:

- Evaluation of internal procedures
 - Assessment of transaction monitoring practices
 - Updates to policies when regulatory guidance changes
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12. Employee Training

Because Kellogg Holdings LLC currently operates with limited personnel, AML responsibilities are overseen directly by the Compliance Officer.

Training and awareness regarding AML obligations are maintained through:

- Ongoing regulatory review
 - Monitoring updates from FinCEN and other regulatory authorities
 - Consultation with compliance professionals when necessary
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13. Program Updates

This AML/KYC program will be updated as necessary to reflect changes in:

- Regulatory requirements
 - Business operations
 - Risk management practices
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Approved By:

Travis Kellogg
Compliance Officer/CEO
Kellogg Holdings LLC