

ANTI-MONEY LAUNDERING/COUNTER FINANCING OF TERRORISM POLICY (AML/CFT POLICY)

Value Care Health Systems, Inc. (“ValuCare” or the “Company”) is committed to maintaining high ethical standards, honesty, and full compliance with all laws and regulations., thus the creation of the Anti-Money Laundering/ Counter Financing of Terrorism Policy (AML/CFT Policy). The AML/CFT Policy is a set of guidelines and procedures implemented by ValuCare to detect, prevent, and report suspicious activities related to money laundering and terrorist financing. This policy will help ValuCare comply with legal requirements and global efforts to combat financial crime and compliance to Anti-Money Laundering Act of 2001 (Republic Act No. 9160), which establishes the Anti-Money Laundering Council (AMLC).

ValuCare demonstrates its full commitment and support to the requirements and compliance with the law by establishing robust and comprehensive policy, procedures and systems for the prevention and detection of money laundering and terrorist financing activities.

Purpose of AML/CFT Policy:

- **Prevention:**

AML/CFT Policy aims to prevent criminals from disguising the source of illicit funds, making it appear legitimate.

- **Detection:**

This policy includes procedures for monitoring transactions and identifying red flags that may indicate suspicious activity.

- **Reporting:**

ValuCare have a legal obligation to report any suspicious transactions or activities to the authorities, through the AMLC.

- **Compliance:**

AML/CFT Policy ensure that financial institutions meet regulatory requirements and avoid potential penalties for non-compliance.

Key Components of the AML/CFT Policy:

Know Your Customer (KYC):

This involves verifying the identity of customers and understanding their business, including their risk profile.

- **Customer Due Diligence (CDD):**

This involves ongoing monitoring of customer transactions and relationships to detect suspicious activity.

- **Suspicious Transaction Reporting (STR):**

Institutions must report STRs to the AMLC.

- **Sanctions Screening:**

Identifying and screening customers and transactions against sanction lists of sanctioned individuals and entities.

- **Transaction Monitoring:**

Analyzing transactions to identify patterns or anomalies that may indicate money laundering or other financial crimes.

Importance of AML/CFT Policy:

- **Protecting the Financial System**
- **Combating Financial Crime**