



**MONEYGRAM INTERNATIONAL Counter Quick Reference
FUNDAMENTAL REQUIREMENTS OF YOUR ANTI-MONEY LAUNDERING COMPLIANCE PROGRAM**

REQUIREMENT	CORRESPONDING AGENT COMPLIANCE TRAINING AND RESOURCE SECTION	INSTRUCTIONS*	TIMEFRAME	RECORD STORAGE REQUIREMENT**
AML Policies & Procedures	Section 2 <i>Agent Compliance Program</i>	<ul style="list-style-type: none"> • Create AML Policies & Procedures by following the Agent Compliance Training Resource • Have all employees who process MoneyGram products or services read your AML Compliance Policies & Procedures and Compliance Program • Have employees sign and date an acknowledgement as proof that this information was communicated to them 	Frequently review and update per changes in government regulations, your Compliance Program requirements, or MoneyGram procedures and policies. Annual review is minimally recommended	Live Document
Monitoring	Section 3 <i>Monitoring</i>	Compliance Officer or designee should use a checklist or other guide to document monitoring of all MoneyGram transactions	As Defined in Your Policies & Procedures (Daily, weekly, monthly etc.)	5 Years
Independent Review	Section 4 <i>Independent Review</i>	The Agent MUST arrange for a periodic independent reviews of its AML Compliance Program as required by Federal AML Regulations	At least once a year	
Employee Training	Section 5 <i>Training</i>	<ul style="list-style-type: none"> • Updated AML Training must be regularly provided to all employees (new and existing) before conducting MSB transactions • Document ALL employees training on the Agent Training Log 	Employee training should be ongoing (based on regulation and policy changes) and in the event of a performance issue related to an AML incident	5 Years
Currency Transaction Report (CTR)	Sections 2 and 7 CTR E-File	<ul style="list-style-type: none"> • A CTR must be E-Filed with the federal government for any cash transactions (whether single or multiple) by any person, or on behalf of any person, greater than \$10,000, including fees, in one business day • The reports must be E-Filed through the BSA E-Filing System at www.fincen.gov 	As Necessary	5 Years
Suspicious Activity Report (SAR)	Sections 2 and 8 <i>SAR E-File</i>	<ul style="list-style-type: none"> • A SAR must be E-Filed with the federal government ANYTIME a money transfer/order is at least \$2,000 and appears suspicious • The reports must be E-Filed through the BSA E-Filing System at www.fincen.gov 	As Necessary	5 Years
Money Order Record	Section 9 <i>Money Order Log</i>	Use the Money Order Transaction Log to document any Money Order purchases of \$3,000 or more by an individual in one business day	Document with EVERY money order transaction of \$3,000 or more	5 Years

* *This Counter Quick Reference is only provided as a reminder of some of the regular fundamental AML Program requirements and SHOULD NOT be considered a complete list of actions and instructions. Please consult the MoneyGram Agent Compliance Training Resource binder for further information available on EVERY Fundamental Requirement reviewed above.*

** NOTE: You must keep ALL MoneyGram transaction and Compliance Program related records in a secure location that is not accessible to the public.



Counter Quick Reference
U.S. Identification, Recordkeeping and Reporting Requirements - (In Person Transactions)
MONEY TRANSFER

Amount of Sale In One Business Day	Requirement	Source
Less than \$900	Send transactions - Record sender's name and sender's address (no ID required). Receive transactions - Photo ID or answer to the test question.	MoneyGram Policy
\$900 - \$2,999	Send transactions - Record sender's name and sender's address. Send and Receive transactions - Verify identity of Sender and Receiver by examining a currently valid government issued photo ID. Record ID type, the ID number, and state/country of issuance.	MoneyGram Policy
\$3,000 or more	Send and Receive transactions - Verify name and address of Sender and Receiver by examining a currently valid government issued photo ID. Record name, address, SSN (if consumer does not have a SSN, Tax identification number or passport number), ID type and number, and state or country of issuance, date of birth and occupation. Obtain Third Party Information if applicable.	Code of Federal Regulations 31 CFR Chapter X and MoneyGram Policy
\$9,100 or more in single transaction	Send transactions (cash) - Sender and Agent must complete an interview conducted by a MoneyGram Customer Service Representative, in addition to the \$3,000 requirements above.	MoneyGram Policy
More than \$10,000 in cash (include fees)	In addition to the \$3,000 requirements above, obtain information necessary to complete and file a Currency Transaction Report through the BSA E-Filing System within 15 days of detection. www.fincen.gov . Keep copies of CTRs for five years.	Code of Federal Regulations 31 CFR Chapter X and MoneyGram Policy
Suspicious Transactions (one or more suspicious transactions totaling \$2,000 or more in one or more days)	The SAR Report must be filed through the BSA E-Filing System within 30 days of detection. www.fincen.gov . Do not "Tip Off" consumer. Keep copies of confirmation SARs for five years.	Code of Federal Regulations 31 CFR Chapter X and MoneyGram Policy

MONEY ORDER

Amount of Sale In One Business Day	Requirement	Source
\$3,000 to \$10,000	Verify identity of purchaser by examining a currently valid government issued photo ID. Record the type of ID examined, the ID number, and state/country of issuance. Record the purchaser's name, address, Social Security Number (or if the purchaser does not have a SSN, record the Alien Identification Number, Tax ID Number or passport number), date of birth, date of purchase, the serial numbers of the money orders purchased, and the dollar amount of each money order. Money Gram recommends using the money order transaction log. Keep records for five years.	Code of Federal Regulations 31 CFR Chapter X
More than \$10,000 in cash (include fees)	Verify identity of purchaser by examining a currently valid government issued photo ID and record the information described above. Obtain information necessary to complete and file a Currency Transaction Report (CTR) through the BSA E-Filing System within 15 days of detection. www.fincen.gov (Keep copies of CTRs for five years).	Code of Federal Regulations 31 CFR Chapter X and MoneyGram Policy
Suspicious Transactions (one or more suspicious transactions totaling \$2,000 or more in one or more days)	The SAR Report must be filed through the BSA E-Filing System within 30 days of detection. www.fincen.gov . Do not "Tip Off" consumer. Keep copies of confirmation SARs for five years.	Code of Federal Regulations 31 CFR Chapter X and MoneyGram Policy

** This Counter Quick Reference is only provided as a reminder of some of the ID requirements for money transfers and money orders and SHOULD NOT be considered a complete list for all situations. Please consult the MoneyGram Agent Compliance Training Resource binder for further information available on Requirement reviewed above.*

NOTE: You must keep ALL MoneyGram transaction and Compliance Program related records in a secure location that is not accessible to the public.

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