

## Compliance Officer Designation

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Name of Person

Title

**is hereby designated as the Compliance Officer.**

### COMPLIANCE OFFICER RESPONSIBILITIES

The Compliance Officer (as well as senior management's) must, at a minimum, meet the following requirements and responsibilities.

#### Regulatory Compliance

- Commit to support and align to MoneyGram's *Global Partner Compliance Policy* and the Agent's Compliance Programs.
- Ensure ongoing compliance with federal and state AML, anti-fraud, sanctions, prevention of terrorist financing and consumer rights and privacy laws and regulations.
- Be authorized to ensure Independent Reviews of the Agent's AML Program.
- Ensure employees are trained on compliance requirements *before* conducting transactions and ensure existing employees are provided ongoing training in an effective manner.
- Ensure accurate recordkeeping as required by federal and state laws and regulations.
- Cooperate with law enforcement and MoneyGram on AML reviews, audits and investigations.
- Implement, review and update the Compliance Programs as necessary due to changes in the laws or regulations and ensure that affected employees have been advised of these changes.

#### Operational Compliance

- Determine if Agent is required to register as a Money Service Business (MSB) as outlined in the **FinCEN Registration and BSA E-Filing** section of MoneyGram's *Agent Compliance Resource Kit*.
- Have the appropriate authority to implement Compliance Programs throughout the network, if applicable.
- If the owner or manager is not the designated Compliance Officer, the Compliance Officer must have the support of the Agent's ownership and management and be titled as an officer or manager with direct lines of communication to ownership or management.
- Assure operations are conducted using a risk-based approach, as demonstrated by the adoption and implementation of transaction monitoring and referral systems.
- Be knowledgeable about the day-to-day business, including the offering of MoneyGram's products and services.
- Ensure there is sufficient staffing and resources to adequately implement the policies and programs the Agent has adopted.
- Notify MoneyGram of any changes to Agent ownership, compliance officer, or contact information.



**Action Required:** Please complete fields above and include this page with **RETURNED FORMS** packet.