



Tradition America LLC

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Anti-Money Laundering Policy Statement

Tradition America LLC ("Tradition") is a broker of financial instruments and is headquartered in New York, New York. The Firm has developed an effective anti-money laundering ("AML") program.

Tradition's efforts include knowing the clients that it introduces to other clients in compliance with the U.S. Department of the Treasury Office of Foreign Assets Control ("OFAC").

Tradition has established policies and procedures designed to be in compliance with OFAC in terms of anti-money laundering and anti-terrorism.

Tradition operates strictly as a "finder" and has no customer accounts on its books. The firm does not hold or pass-through any funds on behalf of any client.

While the firm does not have customers on its books, the firm does perform OFAC checks on clients that the firm introduces to other clients. This check is made at the time that a client engages Tradition as a finder.

Were Tradition to accept customer accounts, the Firm would apply a "customer identification program" ("CIP"), which is designed to acquire and maintain documentation of a client's identity.

Senior management of the Firm has designated an AML / BSA Compliance Officer, who is responsible for overseeing the Firm's AML program.

Tradition conducts business in conformity with the highest ethical standards and adheres to policies designed to prevent money laundering and terrorist financing.

Eric M. Earnhardt
Chief Compliance Officer
AML/BSA Compliance Officer