



# Wealth Enhancement<sup>®</sup>

## Wealth Enhancement Anti-Money Laundering Customer Notice

December 2024

Wealth Enhancement is required by law to collect identifying information, monitor transactions for suspicious activity, and report any potential money laundering activity to the appropriate authorities. The personal information of Wealth Enhancement customers will be kept confidential and only used for compliance purposes;

- **Purpose of AML compliance:**  
The AML program is designed to combat money laundering and terrorist financing by identifying and reporting suspicious activity.
- **Customer identification requirements:**  
Customers may be asked to provide identification documents when opening an account or conducting certain transactions to verify their identity.
- **Transaction monitoring:**  
Wealth Enhancement will monitor account activity for unusual patterns that may indicate suspicious activity.
- **Reporting suspicious activity:**  
Wealth Enhancement is obligated to report any suspicious transactions to the government.
- **Confidentiality:**  
Personal information will be kept confidential and used only for compliance purposes.

Wealth Enhancement Group located in Plymouth, Minnesota, United States of America, and its subsidiaries Wealth Enhancement Advisory Services, NorthCrest Asset Management, Wealth Enhancement Brokerage Services, Wealth Enhancement Trust Services, Wealth Enhancement Tax & Consulting Services (collectively “Wealth Enhancement Group”) make every effort to remain in compliance with laws and rules applicable to its business, including laws and rules relating to anti-money laundering and economic sanctions. The Federal Reserve, Office of the Comptroller of the Currency, Securities and Exchange Commission, Financial Industry Regulatory Authority, Financial Crimes Enforcement Network, Consumer Financial Protection Bureau and various other federal and state banking and securities agencies regulate Wealth Enhancement Group.

It is the policy of Wealth Enhancement Group, and as required by law, that it will not knowingly commit or facilitate financial crime by, at, or through its businesses; and, that it will fully cooperate within the bounds of the law, with authorities conducting investigations into financial crime. In fulfilling this policy, Wealth Enhancement Group may terminate customer

relationships based upon a suspicion of criminal activity, or upon a determination that a customer presents financial crimes risk outside the Company's risk appetite.

It is Wealth Enhancement Group's policy to make every effort to fully comply with laws, rules and regulations relating to financial crimes, wherever it does business. The AML Program Wealth Enhancement Group has developed and implemented is a risk-based Anti-Money Laundering ("AML") program designed to comply with AML laws and regulations in the U.S. and other applicable laws and regulations related to the prevention of money laundering in the jurisdictions where the firm operates.

Wealth Enhancement Group's AML program comprises AML policies, procedures, internal controls and systems, which include but are not limited to the following:

- Designation of a AML Compliance Officer and related AML Compliance officers who are responsible for coordinating and monitoring the day-to-day compliance with the AML Program for their areas;
- A customer identification program and procedures that include the identification and verification of the identity of beneficial owners of certain entity clients
- Procedures, processes and systems to collect and refresh customer due diligence information
- Processes to assess risk at both the program and customer level
- Risk-based procedures, processes and systems to monitor customer transactions and activity
- Procedures, processes and systems to identify and report suspicious activity to appropriate regulatory authorities in accordance with applicable laws
- Procedures, processes and systems to produce other required reports and keep required records and
- Training and education of appropriate employees and related third parties in applicable aspects of AML laws, rules and regulations, as well as processes and methodologies to mitigate the risk of money laundering.

Wealth Enhancement Group has implemented a risk-based compliance program reasonably designed to comply with applicable Sanctions requirements. To the extent permitted by local law, Wealth Enhancement Group's Sanctions compliance program requires the Company and its employees, wherever located, to comply with Sanctions requirements and to take necessary steps to prevent the opening of accounts or the execution or facilitation of transactions for, on behalf of, or for the benefit of, a sanctioned individual, entity, country, region, or organization in violation of Sanctions.

As part of its compliance program, Wealth Enhancement Group has established standards by which it conducts economic sanctions scanning of both customer and transaction data to ensure that the Company does not transact or facilitate prohibited business with, on behalf of, or for the benefit of individuals or entities who are the target of Sanctions. Wealth

Enhancement Group scans customer data against relevant economic sanctions and government lists upon account opening, at the commencement of a servicing relationship, upon changes to existing customer data, as well as upon updates to Sanctions programs. In addition, and on a risk-based approach, transactions, including but not limited to wire transfers, vendor payments, company-issued checks, deposits, transfers and settlements of securities or other assets, and international automated clearinghouse transactions, are scanned through economic sanctions filters.

Wealth Enhancement Group may, on a case-by case basis, request additional information about a transaction to confirm whether it is permissible to process such transaction under applicable sanctions regulations. Failure to provide requested information in a timely manner may delay Wealth Enhancement Group's processing of the transaction or could result in Wealth Enhancement Group refusing to process the transaction or blocking (i.e., freezing) funds and reporting them to relevant government authorities, as required by applicable regulations.

Wealth Enhancement Group's AML and Economic Sanctions programs are subject to independent testing pursuant to applicable rules regulations and laws.