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# STATEMENT ON AML/CFT & SANCTION COMPLIANCE

## Statement on Anti-Money Laundering (AML) and Counter-Financing of Terrorism (CFT) Compliance

BankPro Limited (“BankPro” or “the Bank”) is unequivocally committed to the prevention of financial crime and the comprehensive combating of money laundering and the financing of terrorism. The Bank has a strict intolerance regarding the participation in financial crime with respect to its customers, vendors, employees, contractors or other third parties and transactions in which it serves as intermediary.

BankPro maintains a robust but practical risk culture, strategically embracing well-managed risk to achieve its goals and deliver exceptional client satisfaction. Its Board of Directors and Management prudently assess and monitor the levels of risk exposed to the institution.

### AML/CFT Compliance Program

BankPro, operating as a licensed bank and securities firm in the Commonwealth of The Bahamas, is regulated by the Central Bank of The Bahamas and the Securities Commission of The Bahamas. The Bank is legally obligated to adhere to all applicable AML/CFT laws, regulations, and guidelines, including the Proceeds of Crime Act (POCA), Financial Transactions Reporting Act (FTRA) and the Anti-Terrorism Act (ATA).

To meet these obligations, BankPro has developed and implemented a robust, enterprise-wide Anti-Financial Crime (AFC) framework and a risk-based AML/CFT Compliance Program. This program is designed to comply with the legal requirements of The Bahamas and align with international best practices and standards, such as those issued by the Financial Action Task Force (FATF). The program’s core objective is to protect the Bank, our customers, our partners, and the integrity of the Bahamian and international financial systems from illicit activities.

As a cornerstone of our AML/CFT Compliance Program, BankPro has instituted comprehensive written policies, procedures, and internal controls that include, but are not limited to, the following key areas:

- **Appointment of a Money Laundering Reporting Officer (MLRO):** The designation of a qualified and independent MLRO who is responsible for the oversight of the AML/CFT program.



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- **Customer Due Diligence (CDD):** The implementation of rigorous Know Your Customer (KYC) principles, including mandatory customer identification and verification (ID&V) for all clients prior to establishing a business relationship. Additionally, economic sanctions screening against both clients and transaction counterparties are conducted to mitigate the risk of transacting or facilitating prohibited business with, on behalf of, or for the benefit of individuals or entities who are the target of sanctions.
- **Enhanced Due Diligence (EDD):** The application of more stringent due diligence measures for customers identified as presenting a higher risk, including Politically Exposed Persons (PEPs), their family members, and their close associates.
- **Transaction Monitoring:** The Bank uses varying IT systems, third-party providers and a dedicated transaction monitoring team to conduct ongoing monitoring of customer transactions to detect patterns and behaviors that may be indicative of suspicious activity.
- **Suspicious Activity Reporting:** The thorough investigation of unusual or potentially suspicious transactions and the timely reporting of any confirmed suspicious activity to Financial Intelligence Unit (FIU) as required by law.
- **Employee Training:** The training of all relevant employees and directors to ensure they are aware of their legal obligations and can effectively identify and manage financial crime risks.
- **Independent Testing:** The regular and independent testing of the AML/CFT program's effectiveness, conducted by the independent second line of defense along with internal and/or external auditors, to ensure its ongoing integrity and compliance.

The AML/CFT Program is subject to annual risk assessments, independent testing, and regulatory examinations. It is routinely enhanced to reflect changes to business activities, legal requirements, and regulatory expectations. For further details of the bank's Anti-Financial Crime framework, please review BankPro's Wolfsberg Group Financial Crimes Compliance Program Questionnaire.

*The information contained within this Statement is for informational purposes only and any questions regarding this statement or the AML/CFT Program should be directed to: [compliance@bankpro.com](mailto:compliance@bankpro.com).*



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