Group Anti-Money Laundering and Counter-Terrorist Financing Policy

In accordance with the Act on Reporting and Using Specified Financial Transaction Information and other relevant laws and regulations, iM Financial Group operates basic principles and systems to prevent and manage money laundering and terrorist financing risks that may arise within the financial holding company and its subsidiaries.

1. Know Your Customer (KYC)

When a customer opens a new account or engages in an occasional financial transaction above the legal threshold, we verify customer identity, purpose of transaction, source and origin of funds, and ultimate beneficial ownership through credible documents. For non-face-to-face customers, we fulfill our customer due diligence obligations in compliance with regulatory guidelines, such as ID capture and video calls. Even after establishing a customer relationship, we conduct continuous customer due diligence, including assessing money laundering and terrorist financing risks at appropriate intervals while the business relationship is maintained.

2. Risk Management System

Prior to executing financial transactions, iM Financial Group checks whether customers or beneficial owners match watchlists under the following categories. If identified as high-risk individuals, we perform Enhanced Due Diligence (EDD) and obtain approval from senior management:

A. Persons subject to restrictions on financial transactions as announced by the Financial Services Commission under the Counter-Terrorism Financing Act
B. Sanctioned individuals and entities designated by the United Nations
C. Nationals (individuals, legal entities, and organizations) or residents of high-risk and non-cooperative jurisdictions identified by the FATF
D. Persons on financial transaction restriction lists issued by foreign governments where overseas branches, etc., are located due to concerns over money laundering risks
E. Politically Exposed Persons (PEPs) lists, among others

3. Know Your Employee (KYE)

To prevent internal employees from engaging in money laundering and terrorist financing activities, iM Financial Group conducts background checks on newly hired personnel, including obtaining signed pledges, and performs regular KYE procedures, such as watchlist filtering for existing employees.

4. Education and Training

iM Financial Group conducts education and training programs tailored to respective roles and responsibilities at least once a year for all officers and employees (including executives and outside directors).

5. Independent Audit

An independent department, separate from the AML operational unit, conducts a review and evaluation of the adequacy and effectiveness of AML operations at least once a year. The audit results, including deficiencies identified and areas for improvement, are reported to the Board of Directors.

6. Transaction Monitoring and Reporting System

To prevent money laundering and terrorist financing activities, iM Financial Group monitors customer transactions by analyzing financial transaction patterns. The Reporting Officer reports suspicious transactions and large cash transactions to the Korea Financial Intelligence Unit (KOFIU).

7. Record Keeping

iM Financial Group retains records of customer due diligence, financial transaction records, internal and external reports—including reports on suspicious transactions and large cash transactions—and related documents for five years from the termination of the financial transaction relationship.