

Anti-Money Laundering Policy

Interval Recovery Services LLC

Effective Date: September 16, 2026

Interval Recovery Services LLC ("Interval," the "Company," "we," or "us"), a Utah limited liability company, is a licensed and bonded third-party debt collection agency. Interval is committed to conducting its business with integrity and to preventing its operations from being used, directly or indirectly, to facilitate money laundering, terrorist financing, sanctions evasion, or other financial crime. This Anti-Money Laundering Policy (this "Policy") sets out the risk-based policies, procedures, and internal controls the Company maintains to further that commitment and to comply with applicable law.

This Policy applies to all principals, owners, officers, managers, employees, and agents of the Company (collectively, "Covered Persons"). Adherence to this Policy is mandatory. It is intended to be reasonable and appropriate to the size, scope, and risk profile of a third-party debt collection business, and it is not a substitute for legal advice on any specific transaction.

1. Policy Statement and Scope. The Company prohibits money laundering and the financing of illegal activity in connection with any account it services. Although a third-party debt collection agency is generally not classified as a "financial institution" required to maintain a formal anti-money laundering program under the federal Bank Secrecy Act, the Company voluntarily maintains this Policy as a matter of sound business practice, to satisfy the expectations of its creditor clients, and to support its licensed and bonded status. All Covered Persons must conduct the Company's collection, payment-processing, and remittance activities in compliance with this Policy and all applicable federal and state laws.
2. Applicable Legal Framework. The Company designs and administers this Policy with reference to the principal legal authorities that bear on its business, including: (i) the criminal money laundering statutes, 18 U.S.C. §§ 1956 and 1957; (ii) the Bank Secrecy Act and its implementing regulations, 31 U.S.C. § 5311 et seq. and 31 C.F.R. Chapter X; (iii) the requirement to report the receipt of more than \$10,000 in cash in the course of a trade or business on IRS/FinCEN Form 8300, 31 C.F.R. § 1010.330 and 26 U.S.C. § 6050I; (iv) the prohibition on structuring transactions to evade reporting, 31 C.F.R. § 1010.314; and (v) the economic sanctions programs administered by the U.S. Treasury Department's Office of Foreign Assets Control ("OFAC"). The Company also complies with the licensing, bonding, and consumer-protection requirements applicable to third-party debt collectors in each jurisdiction in which it operates.
3. AML Compliance Officer. The Company designates Blake Moon, Head of Collections, to serve as its AML Compliance Officer (the "Compliance Officer"). The Compliance Officer has primary responsibility for administering this Policy, and his duties include:
 - (a) developing, implementing, and periodically updating this Policy and the Company's related procedures and internal controls;
 - (b) serving as the Company's point of contact for AML matters, including responding to lawful information requests from creditor clients, regulators, and law enforcement;
 - (c) overseeing sanctions screening, the review and escalation of red flags, and the filing of any reports required by law;
 - (d) establishing and maintaining the recordkeeping system described in this Policy;
and
 - (e) arranging employee training and the periodic independent review of this Policy.

4. Client and Account Due Diligence. Before accepting a new creditor client or a portfolio of accounts for collection, the Company will take reasonable, risk-based steps to understand the client and the source of the accounts, including:

- (a) verifying the identity, legal existence, and good standing of the creditor client or debt seller;
- (b) obtaining reasonable information about the nature and origin of the accounts placed for collection;
- (c) screening the creditor client (and its principals, where appropriate) against OFAC's list of Specially Designated Nationals and Blocked Persons (the "SDN List") and applicable sanctions programs; and
- (d) applying enhanced scrutiny to any client, account, or transaction that presents a higher risk of money laundering or sanctions exposure.

5. Consumer Payment and Sanctions Screening. When processing payments from consumers, the Company will apply reasonable, risk-based controls to detect and prevent misuse of its collection channels. The Company screens payees and remittance counterparties against the SDN List as appropriate and will not knowingly process a payment to or from a person or jurisdiction subject to blocking under OFAC sanctions. If a potential match is identified, the Covered Person must place the payment on hold and refer the matter to the Compliance Officer before proceeding.

6. Cash Handling and Currency Reporting. Consistent with its business model, the Company discourages the acceptance of cash and cash equivalents (e.g., currency, cashier's checks, bank drafts, traveler's checks, or money orders) and accepts them only with the prior approval of the Compliance Officer. The Company will report the receipt of more than \$10,000 in cash in one transaction (or in related transactions) on IRS/FinCEN Form 8300 within the time required by law. No Covered Person may structure, assist in structuring, or accept a payment structured to evade any currency-reporting requirement.

7. Red Flags. Covered Persons must remain alert to activity that may indicate money laundering or other financial crime. Red flags include, without limitation:

- payment of a debt with multiple money orders, cashier's checks, or cash in amounts structured to stay below \$10,000;
- overpayment of an account followed by a request to refund the excess to a third party or a different account;
- a consumer's or client's refusal or reluctance to provide identifying information;
- requests to remit funds to an account, person, or country unrelated to the account or the creditor client;
- payments from, or on behalf of, a person or jurisdiction subject to OFAC sanctions; and
- any transaction that lacks an apparent lawful business or economic purpose.

8. Reporting Suspicious Activity. A Covered Person who identifies a red flag or otherwise suspects money laundering or related misconduct must promptly report it to the Compliance Officer and must not discuss the report with the consumer, client, or any other person involved. The Compliance Officer will review each report, determine what further action is warranted (including consultation with counsel and the filing of any report required by law), and document

the review and its outcome. The Company prohibits retaliation against any Covered Person who reports a concern in good faith.

9. Employee Training. The Company will provide AML training to Covered Persons appropriate to their roles, both at onboarding and periodically thereafter. Training will cover this Policy, the recognition of red flags, sanctions-screening obligations, cash-reporting requirements, and the procedure for reporting suspicious activity. The Compliance Officer will maintain records of training completed.

10. Recordkeeping. The Company will maintain records supporting this Policy for at least five years, or longer where required by applicable law or client agreement, including:

- (a) client onboarding and due-diligence documentation;
- (b) records of sanctions screening conducted, including the name checked, the date, and the person who conducted the review;
- (c) any Form 8300 or other report filed with a governmental authority;
- (d) records of red flags identified and their disposition;
- (e) training records; and
- (f) copies of this Policy and all amendments, together with each independent-review report.

11. Independent Review. At least annually, the Company will arrange for an independent review of this Policy and its implementation by a person not responsible for day-to-day AML compliance. The reviewer will test the adequacy of the Company's procedures and controls and report findings to management, and the Compliance Officer will address any deficiencies identified.

12. Confidentiality. All communications and reports made under this Policy concerning suspected money laundering are confidential and will be handled in accordance with the Company's privacy policy and applicable law. Covered Persons may not disclose the existence or content of a suspicious-activity report except as permitted or required by law.

13. Licensing and Bonding. The Company maintains the licenses and surety bonds required to operate as a third-party debt collection agency in the State of Utah and in each other jurisdiction in which it does business. The Compliance Officer, together with management, will keep these licenses and bonds current and will treat compliance with this Policy as part of the Company's overall regulatory-compliance posture.

14. Ongoing Compliance and Amendments. The Compliance Officer will review this Policy periodically, and after any material change in the Company's business or in applicable law, and will amend it as necessary. This Policy does not create any third-party rights and may be revised by the Company at any time.

15. Effective Date. This Policy is effective as of September 16, 2026 and was adopted by the Company on that date.