Anti-Money Laundering Policy

This Anti-Money Laundering (AML) Policy establishes the framework by which Ascenda Enterprise Capital LLC identifies, prevents, and reports potential money laundering and suspicious financial activity. This policy applies to all capital commitments, investor relationships, and financial transactions involving AEC.

1. PURPOSE & SCOPE

Ascenda Enterprise Capital LLC is committed to full compliance with all applicable anti-money laundering laws and regulations, including the Bank Secrecy Act (BSA) and relevant provisions of the USA PATRIOT Act. This policy applies to all prospective and confirmed investors, capital commitments, and financial transactions processed through AEC.

2. CUSTOMER IDENTIFICATION PROGRAM (CIP)

Prior to accepting any capital commitment, AEC will collect and verify the following information for all investors: full legal name; date of birth (individuals) or date of formation (entities); residential or principal business address; government-issued identification number (SSN, EIN, or passport number); source of funds and source of wealth.

AEC reserves the right to request additional documentation to verify identity and the legitimacy of funds.

3. BENEFICIAL OWNERSHIP

For entity investors (LLCs, trusts, corporations, partnerships), AEC will collect beneficial ownership information for all individuals who own 25% or more of the entity, as well as the individual with significant managerial control. Each beneficial owner must complete AEC's Investor Questionnaire and provide government-issued identification.

4. PROHIBITED INVESTORS

AEC will not knowingly accept capital from: individuals or entities on the OFAC Specially Designated Nationals (SDN) list; individuals or entities subject to U.S. or international sanctions; individuals or entities known to be involved in illegal activities; shell companies or anonymous structures where beneficial ownership cannot be determined; or Politically Exposed Persons (PEPs) without enhanced due diligence review and senior approval.

5. ENHANCED DUE DILIGENCE

AEC will apply enhanced due diligence for investors presenting higher risk factors, including but not limited to: investors from high-risk jurisdictions as designated by FATF, unusually large capital commitments relative to stated income or net worth, complex ownership structures, or any investor relationship flagged during the CIP process.

6. SUSPICIOUS ACTIVITY

AEC personnel are required to monitor for and report suspicious activity, including: unusual or unexplained requests for cash transactions; investors who are reluctant to provide required identification information; capital commitments that appear inconsistent with stated investor profile; requests to transfer funds to unrelated third parties; or any activity that appears structured to evade reporting requirements.

Suspicious activity will be escalated to the Managing Member immediately for review and, where required by law, reported to the appropriate authorities.

7. RECORDKEEPING

AEC will maintain records of all investor identification documents, source of funds information, and transaction records for a minimum of five (5) years from the date of the investor relationship or transaction, whichever is later. Records will be maintained in a secure, confidential manner and made available to authorized regulatory authorities upon request.

8. WIRE TRANSFER POLICY

AEC will only accept capital transfers from bank accounts held in the name of the investor of record. Third-party wire transfers are not accepted without prior written approval from the Managing Member and completion of enhanced due diligence on the originating party. All wires must originate from a U.S.-domiciled FDIC-member institution unless specifically approved in writing.

9. TRAINING & OVERSIGHT

The Managing Member (Izaiah Cottle) is responsible for implementing, maintaining, and overseeing this AML Policy. AEC will review and update this policy annually and whenever there are material changes to applicable law or AEC's operations.

10. NON-RETALIATION

AEC strictly prohibits retaliation against any person who in good faith reports suspected money laundering or suspicious activity. Any individual who believes they have witnessed a violation of this policy is encouraged to report it directly to the Managing Member.

POLICY ADOPTION

Adopted By	Izaiah Cottle · Managing Member & CEO
Entity	Ascenda Enterprise Capital LLC
Effective Date	June 7, 2026
Next Review	June 2027

Ascenda Enterprise Capital LLC · Registered in the State of Georgia · Confidential Internal Policy Document
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This policy is subject to annual review and update · Questions: contact the Managing Member directly