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1.0 POLICY OVERVIEW, PURPOSE AND SCOPE

OneMain (the "Company") complies with U.S. federal laws and regulations that require financial institutions to have programs in place to detect, prevent and report illicit criminal activities, including money laundering and terrorist financing. Reporting from financial institutions is a significant source of information used by law enforcement to help combat criminal activities.

The laws and regulations include, but are not limited to:

- The Bank Secrecy Act (BSA)
- The USA PATRIOT Act of 2001 (USA PATRIOT Act)
- Rules and regulations issued by the Office of Foreign Assets Control (OFAC)

These laws and regulations are collectively referred to in this Policy as the Bank Secrecy Act/Anti-Money Laundering (BSA/AML) laws and regulations.

This policy defines the principles and guidelines that govern the Company's BSA/AML Program ("Program"). Requirements for complying with the rules and regulations issued by OFAC are set forth in [Office of Foreign Assets Control Policy, 6230](#).

The extent to which the various provisions of the BSA and USA PATRIOT Act apply to the Company is based on the rules and regulations issued by the U.S. Treasury Department and the Financial Crimes Enforcement Network (FinCEN) for the different categories of financial institutions defined under the acts. Under the current definition, OneMain is broadly defined as a "nonbank financial institution" (NBFI) under the subcategory of "loan or finance company."

FinCEN has not defined BSA/AML requirements for loan or finance companies, except those that are engaged in Residential Mortgage Loan Origination (RMLO). The Company therefore maintains, as good business practice and corporate responsibility, a Program.

To the extent OneMain provides services to a company that is expressly subject to BSA requirements, the Company maintains policies, procedures and processes designed to assist that company to comply with all applicable provisions of the BSA as defined herein.

This policy applies to all team members and other authorized personnel involved directly or indirectly in carrying out the requirements as defined herein.

2.0 RELATED POLICIES, PROCEDURES, STANDARDS AND FORMS

This policy assumes a familiarity with the following:

POLICY/PROCEDURE/STANDARD/FORM	Reference	POLICY/PROCEDURE/STANDARD/FORM	Reference
Enterprise Third Party Risk Management	5100	Auto Purchase Program (APP) – Centralized Verification	CCO-VF.003
Money Laundering and Terrorist Financing Red Flags	6159	Centralized Verification	CCO-VF.001

Office of Foreign Assets Control Policy	6230	Information Sharing with Product Partner	CCP-PROC.002
Application Verification	A-302	Sanctions Screening	CCP-PROC.001
Credit Report Alerts	A-307	Suspicious Activity Monitoring	CCP-PROC.003
Processing Loan Payments	B-201		

3.0 POLICY REQUIREMENTS

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3.1 BSA/AML PROGRAM

To promote compliance with this Policy, the Company maintains a Program that is integrated into the overall framework of the Business. The Program is composed of the following key elements:

- A. Designated BSA/AML Officer
- B. Internal controls designed to maintain BSA/AML compliance
- C. BSA/AML training for team members and non-team members Board members
- D. Customer Identification
- E. Cash Payments and Reporting
- F. Law Enforcement Inquiries and Requests
- G. Roles and Responsibilities

3.2 BSA/AML OFFICER

The Chief Compliance Officer (CCO) is the designated BSA/AML Officer and may delegate duties to other team members; however, the BSA/AML Officer remains responsible for the overall management of the Program and its results.

The BSA/AML Officer is responsible for:

- A. Establishing and communicating the overall BSA/AML risk management strategy for the Company.
- B. Providing guidance and subject matter expertise.
- C. Reviewing and updating BSA/AML policies, procedures and Program controls.
- D. Performing periodic risk assessments during the Compliance Annual Risk Assessment to determine the Company's BSA/AML risk profile and develop appropriate risk mitigation strategies.
- E. Coordinating day-to-day Program activities.
- F. Escalating to Management key BSA/AML initiatives, identified compliance deficiencies and required corrective action or remediation.
- G. Maintaining such documentation as required by this Program in a manner that supports effective testing, audit and examination activities.

3.3 INTERNAL CONTROLS

The Company maintains an effective BSA/AML internal control structure through the implementation of written policies, procedures and processes designed to limit and control BSA/AML risks and achieve compliance with BSA/AML laws, regulations and guidance.

Internal controls are designed to:

- A. Identify business operations more vulnerable to abuse by money launderers and criminals (i.e., products, services and customers).
- B. Provide for periodic updates to the Company's BSA/AML risk profile.
- C. Provide for a Program tailored to manage risks.
- D. Inform the Management of BSA/AML initiatives, identified compliance deficiencies and corrective actions or remediation through standard compliance reporting.
- E. Identify persons responsible for BSA/AML compliance and maintain staff sufficient to execute Program activities.
- F. Provide for Program continuity despite changes in management or team member composition or structure.
- G. Provide sufficient controls and monitoring systems for timely detection and reporting of suspicious activity.
- H. Meet all regulatory recordkeeping and reporting requirements. Provide for timely updates to policies, procedures and Program documents in response to changes in BSA/AML laws, regulation or regulatory guidance.
- I. Implement risk-based customer identification policies and procedures.
- J. Where appropriate, provide for dual controls and the segregation of duties to the extent possible.
- K. Train team members to be aware of responsibilities under BSA/AML laws, regulations and internal policy guidelines.

3.4 BSA/AML TRAINING

The BSA/AML Officer establishes and coordinates training for team members whose duties may require knowledge of BSA/AML.

- A. BSA/AML training is mandatory.
- B. Training is required within 60 days from date of hire and every other year thereafter.
- C. Training materials and attendance records are maintained by the OneMain Technical Learning Group.
- D. Additional information on training communications are provided to team members as applicable.

3.5 CUSTOMER IDENTIFICATION

- A. The Company maintains a customer identification process that establishes the requirement to verify the identity of each customer that opens a new account, to the extent reasonable and practicable, so that the Company may form a reasonable belief that it knows the true identity of each customer.
- B. For purposes of the customer identification process, "reasonable belief" means that identity information, as required, is obtained for each customer and that independent means are used to verify some or all of the identity. This includes viewing identification documents in conjunction with an in-person meeting with the customer and or using reliable third party websites and available government databases.
- C. The following are key customer information details required for review and verification:
 - 1. Full Legal Name
 - 2. Address
 - 3. Date of Birth
 - 4. Social Security Number (SSN) or Individual Tax Identification Number (ITIN)
- D. Requirements for the verification of customer identification take into consideration the relevant risks presented by the various types of account relationships maintained by the Company and provides reasonable belief that it knows the identity of its customers that may potentially present the greatest risk.

3.6 CASH PAYMENTS AND REPORTING

- A. The Company monitors, identifies and reports any payments received on a loan that are made in cash.
- B. Cash payments over \$10,000 trigger specific reporting requirements to the Internal Revenue Service by IRS Form 8300. Submission of IRS Form 8300 is handled by an individual designated by the BSA/AML Officer. The specific requirements and procedures for reporting such transactions are outlined in [Processing Loan Payments, B-201](#).

Note: Cash payments are not accepted for the Credit Card product.

- C. Any team member who suspects possible suspicious activity is required to immediately notify their manager and the BSA/AML Officer. If warranted, the BSA/AML Officer, in conjunction with the Legal Department, determines appropriate actions, which may include notifying the proper law enforcement agencies.

3.7 LAW ENFORCEMENT INQUIRIES AND REQUESTS

- A. Law enforcement inquiries and requests include grand jury subpoenas, National Security Letters (NSLs) and Section 314(a) requests.
- B. At present, a mechanism is not established by FinCEN for OneMain, as a loan or finance company, to participate in 314(a) information sharing. However, to the extent OneMain provides services to a company under a service provider arrangement where that company is required to comply with 314(a) information sharing, OneMain assists that company to perform account searches and reports the results of those searches to the company's BSA/AML Officer or other designated individual.
- C. When the Company identifies subjects of law enforcement requests, the account transaction activities are reviewed by the Legal Department and information shared with the BSA/AML Officer. If the activities involve the accounts or transactions of a serviced company under a BSA obligation, the BSA/AML Officer notifies that company so that a potential SAR may be filed.

3.8 ROLES AND RESPONSIBILITIES

- A. The Company's Management must ensure team members adhere to the standards and requirements defined in this Policy and to put into place sufficient system and process controls, including appropriate Quality Assurance and Control routines, to support compliance with all legal and regulatory requirements.
- B. The CCO is the BSA/AML Officer and is responsible for the overall administration of the Program and administers the day-to-day components of the Program.
- C. The CCO provides monthly status report management covering cash transaction monitoring.
- D. The General Counsel and Legal Department are responsible for advising Management and the CCO on matters related to BSA/AML law, regulation and supervisory guidance. The Legal Department also ensures that service provider arrangements, where AML compliance is involved, include contractual provisions and assurances regarding the service provider's obligations related to BSA/AML compliance.

4.0 AUTHORIZATION/APPROVALS

N/A

5.0 REVISION HISTORY

Revision Date	Revision Description
10/3/2022	This update renames Central Auto Purchase Program (CAPP) with Auto Purchase Program (APP) throughout.
2/7/2022	Holistic review is complete with no material changes.
7/19/2021	This update reflects changes required for the Card product in Sections 3.6 and 3.7.