BEST HOLDINGS

Financial Crime Compliance Program Statement

Document Code: BH-FCCS-2026-01
Version: 1.0
Effective Date: August 26, 2026
Classification: Public
Document Owner: Compliance Function

CONTROLLED DOCUMENT

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Document Control

This page records the Statement's authority, ownership, review cycle, classification, distribution, governing publications, and revision history.

Field	Details
Document Title	Financial Crime Compliance Program Statement
Document Code	BH-FCCS-2026-01
Publication Type	Public Program Statement - Derived External Disclosure
Version	1.0
Status	Final / Approved
Document Owner	Compliance Function
Approved By	Managing Partners
Effective Date	August 26, 2026
Review Frequency	At least annually and upon material change
Next Scheduled Review	August 26, 2027
Classification	Public
Distribution	Best Holdings website and authorized institutional distribution
Governing Publications	Compliance Documentation Standard (BH-CDS-2026-01); Compliance Governance Framework (BH-CGF-2026-01)
Primary Source	AML & Financial Crime Compliance Manual (BH-AML-2026-01)
Related Publications	Responsible Sourcing Manual (BH-RSM-2026-01); Anti-Bribery & Corruption Policy (BH-ABC-2026-01); Code of Business Conduct & Ethics (BH-COC-2026-01)

Revision History

Version	Date	Description	Prepared By	Approved By
1.0	August 26, 2026	Initial public release	Compliance Function	Managing Partners

Document Status

This Statement is the approved public derivative disclosure of selected elements of the Best Holdings Compliance Management System. It is authoritative as the current public Statement but does not replace the governing internal publications or transaction-specific decisions, create independent control authority, constitute regulatory approval or certification, or provide independent assurance of operating effectiveness.

Program Framework

Best Holdings is a United States-based, mandate-led strategic intermediary and transaction coordinator. The firm evaluates and supports selective engagements involving real assets, precious metals, strategic minerals, energy commodities, financial instruments, and related cross-border opportunities. Best Holdings maintains a formal, risk-based Financial Crime Compliance Program within its Compliance Management System to address the risks arising from those activities.

1. Purpose, Status, and Scope

The Program is designed to prevent Best Holdings from knowingly facilitating money laundering, terrorist or proliferation financing, sanctions evasion, fraud, corruption, tax crime, smuggling, theft, trade-based money laundering, or other serious financial misconduct. It applies to covered relationships and transactions and is calibrated to the firm's role, the stage of the engagement, the parties and jurisdictions involved, the asset or product, the payment path, and the quality of available evidence.

This Statement is a public, derivative description of selected program architecture. The approved internal publications, records, and transaction-specific decisions remain authoritative. This Statement does not authorize regulated activity, modify contractual obligations, or replace any counterparty's independent legal, compliance, or diligence responsibilities.

In this Statement, "may" denotes permitted discretion or option.

2. Governance and Accountability

The Managing Partners retain ultimate accountability for risk appetite and material financial-crime decisions. The Compliance Function administers the Program and may require information, impose conditions, pause onboarding or execution, escalate concerns, preserve records, and coordinate qualified external advice. Commercial urgency, prestige, revenue, sunk cost, relationship value, or senior sponsorship does not override diligence, restrictions, or stop authority.

A person who originates, sponsors, or economically benefits from a transaction may participate in diligence but is not the sole approver of a high-risk acceptance, material exception, payment deviation, or suspicious-activity disposition. Best Holdings uses second-person review and external legal, sanctions, forensic, technical, or local expertise where the nature of the risk, independence, or internal capability warrants it.

CORE RULE: No relationship or transaction is approved merely because an introduction has been made, a nondisclosure agreement has been signed, a mandate has been represented, a bank instrument has been proposed, or commercial terms appear attractive. Approval is specific to the documented parties, facts, structure, conditions, and period.

3. Risk-Based Program Architecture

The Program follows a staged lifecycle: opportunity and role mapping; qualification; counterparty due diligence; enhanced due diligence where warranted; transaction review; pre-execution confirmation; monitoring and change control; and close, suspension, rejection, or exit. Material changes in ownership, parties, banks, payment instructions, route, custody, destination, economics, documents, or risk may suspend the affected approval pending review.

Parties and ownership	Identity, authority, beneficial ownership, control, signatories, intermediaries, and mandates.
Integrity and restrictions	Sanctions, politically exposed person status, adverse information, fraud, corruption, conflicts, and prohibited conduct.
Funds and transaction purpose	Source of funds or wealth where risk warrants, economic purpose, commercial logic, commissions, and payment paths.
Assets and execution	Title, provenance, responsible sourcing, documents, logistics, custody, settlement, and material-change controls.

Controls, Assurance, and Boundaries

4. Counterparty, Transaction, and Sanctions Controls

Best Holdings applies proportionate diligence to relevant counterparties, beneficial owners, controllers, authorized signatories, intermediaries, banks, vessels, logistics providers, and other material participants. Review may include identity, authority, ownership and control, business legitimacy, reputation, politically exposed person status, adverse information, source of funds or wealth where risk warrants, economic purpose, commissions, mandates, payment instructions, and other facts necessary to understand the relationship or transaction.

Sanctions and integrity screening is performed before counterparty acceptance, before material execution, upon material change, periodically for active elevated or high-risk relationships, and when relevant sanctions programs or lists materially change. Screening supports decisions but does not replace identity verification or factual analysis. A potential match is placed on hold and escalated. Activity involving a likely or confirmed match does not proceed absent documented lawful authorization and qualified advice.

Transaction controls assess coherence across the parties, source and origin, title, quantity and specification, price and economic purpose, route, logistics, custody, insurance, payment path, settlement sequencing, and supporting documents. Unexplained third-party payments, personal accounts, changed banking instructions, paymaster or escrow anomalies, document inconsistencies, and requests to conceal, backdate, misdescribe, bypass, or destroy information are hold or escalation indicators. Responsible-sourcing and anti-corruption requirements apply where relevant under the related governing publications.

5. Monitoring, Escalation, and Program Assurance

Monitoring is proportionate to active risk and transaction activity. Best Holdings does not represent that it operates automated bank-style transaction monitoring. Monitoring is primarily event-driven and relationship-based, using documented comparisons between approved and actual facts before, during, and after material execution and during periodic or trigger-based review.

Where activity appears potentially prohibited, materially deceptive, connected to illicit source or serious abuse, unsupported after reasonable inquiry, non-cooperative, or beyond the firm's capability or risk appetite, Best Holdings may reject, suspend, restrict, or exit. Personnel are required to stop affected activity where continued performance could increase legal, financial, or evidentiary risk; preserve relevant records; notify the Compliance Function; protect review integrity; and document the disposition. External reporting and cooperation are coordinated with qualified counsel as authorized or required. Best Holdings does not represent that it files Suspicious Activity Reports unless it is legally authorized or required to do so as an applicable reporting institution.

Covered records are retained for at least five years after the later of transaction completion or relationship termination, unless a longer period applies. Relevant personnel receive role-appropriate training before independently performing covered functions and periodically thereafter. The Compliance Function monitors selected controls and arranges risk-based testing at least annually or more frequently where activity, findings, or risk warrants. Findings are documented, assigned, remediated, and escalated according to severity. The Managing Partners and Compliance Function review program alignment, material changes, limitations, resources, findings, exceptions, and remediation through scheduled and event-driven governance.

6. Regulatory Boundary and Public Notice

Best Holdings does not ordinarily receive customer deposits, transmit money for the public, take custody of client assets, or hold itself out as a regulated financial institution. The Program does not state or imply that Best Holdings is a bank, money services business, broker-dealer, investment adviser, futures commission merchant, commodity trading adviser, regulated precious-metals dealer, custodian, payment service, or other licensed financial institution. A formal applicability review and qualified legal advice are required before any material change involving funds, custody, title, inventory, principal risk, digital assets, new jurisdictions, materially different products, or potentially regulated activity.

This Statement is provided for general institutional information. It is not legal advice, a contractual commitment, a certification of compliance with every law in every jurisdiction, a guarantee of prevention or detection of financial crime, or independent assurance of program effectiveness. Best Holdings may provide additional approved summaries, redacted evidence, certifications, or controlled diligence access where appropriate and legally permissible.

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