

EXHIBIT K

Bluestem Brands, Inc Credit Compliance Policy

Section 11.1

OFAC Policy

I. PURPOSE

The Office of Foreign Assets Control (OFAC) of the Department of the Treasury administers and oversees a series of laws that impose economic sanctions against hostile targets to further U.S. foreign policy and national security objectives. OFAC is responsible for promulgating, developing, and administering the sanctions for the Treasury under eight federal statutes. All of the financial institution regulatory agencies cooperate in ensuring financial institution compliance with the OFAC regulations. The OFAC laws and regulations promote national and international security by requiring asset freezing of oppressive governments, international terrorists, narcotic traffickers, and other specially designated persons.

The purpose of this policy is to ensure compliance with the OFAC regulations by identifying individuals who are on the OFAC Specially Designated Nationals (SDN) and Blocked Persons list so that we and our partner banks do not engage in business or facilitate any credit card account transactions with them.

II. OBJECTIVES

The objectives of this policy are to:

1. Identify by comparison to the OFAC SDN and Blocked Persons list a "true match" of any individual who:
 - a. applies for a new credit card account issued by our partner banks; or
 - b. is a current customer with a credit card account issued by one of our partner banks and serviced by Bluestem Brands, Inc ("Bluestem")
2. To verify that a true match exists in the event of a possible match.
3. If a true match exists, decline the credit card applicant, or if account has already been approved, block and close the account.
4. Report any true matches to our partner bank to be reported to the OFAC.

III. MATCHING PROCESS

New Credit Card Applications

All individuals applying for a new credit card account issued by our partner banks must be compared to the OFAC SDN for any true matches before application approval. This comparison process is completed through the Equifax product, OFAC Alert. OFAC Alert compares individual

Ofac Policy And Procedure Guide

William A. Hancock

Ofac Policy And Procedure Guide:

Bank Secrecy Act/Anti- Money Laundering Examination Manual Federal Financial Institutions Examinati,2015-05-20 NO FURTHER DISCOUNT ON THIS ITEM OVERSTOCK SALE Significantly reduced list price while supplies last This manual provides guidance to examiners for carrying out Bank Secrecy Act Anti Money Laundering and Office of Foreign Assets Control OFAC examinations An effective Bank Secrecy Act Anti Money Laundering compliance program requires sound risk management This manual also provides guidance on identifying and controlling risks associated with money laundering and terrorist financing Al Qaeda The Many Faces of an Islamist Extremist Threat Report June 2006 can be found here <https://bookstore.gpo.gov/products/sku/052-070-07483-3> Operationalizing Counter Threat Finance Strategies can be found at this link <http://bookstore.gpo.gov/products/sku/008-000-01131-1> Economic Security Neglected Dimension of National Security can be found at this link <http://bookstore.gpo.gov/products/sku/008-020-01617-9> also available as an ebook at this link <http://bookstore.gpo.gov/products/sku/999-000-44440-9> Armed Groups Studies in National Security Counterterrorism and Counterinsurgency can be found at this link <http://bookstore.gpo.gov/products/sku/008-020-01573-3> CONTROLLED ITEMS REQUIRE SPECIAL ORDERING PROCEDURES Please see links to the US Government Online Bookstore to find out how to order Controlled items Trade Based Money Laundering Reference Guide English Language Edition Package of 5 Controlled Item is available here <https://bookstore.gpo.gov/products/sku/008-001-00225-4> Trade Based Money Laundering Reference Guide Spanish Language Edition package of 5 Controlled Item can be found here <https://bookstore.gpo.gov/products/sku/008-001-00226-2>

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Corporate Counsel's Guide to Strategic Alliances Alan S. Guterman,1995

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