

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

Richard H. Girgenti, Timothy P. Hedley



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Bank Secrecy Act/Anti- Money Laundering Examination Manual Federal Financial Institutions Examination, 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/052070074833> Operationalizing Counter Threat Finance Strategies can be found at this link <http://bookstore.gpo.gov/products/sku/008000011311> Economic Security Neglected Dimension of National Security can be found at this link <http://bookstore.gpo.gov/products/sku/008020016179> also available as an ebook at this link <http://bookstore.gpo.gov/products/sku/999000444409> Armed Groups Studies in National Security Counterterrorism and Counterinsurgency can be found at this link <http://bookstore.gpo.gov/products/sku/008020015733> 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/008001002254> Trade Based Money Laundering Reference Guide Spanish Language Edition package of 5 Controlled Item can be found here <https://bookstore.gpo.gov/products/sku/008001002262> Corporate Counsel's Guide to Economic Sanctions and Embargoes, 1996 Profit Magic Myril Shaw, 2025-11-10 Profit Magic helps you add and protect an additional six figures on your bottom line profit Recreational luxury dealers and their employees often very often and way too often leave six figures of profit on the table Beyond that they risk much more in fines and penalties for behaviors that they could easily correct and easily document the correction Profit Magic is all about adding six figures or more of F I profit to the bottom line by doing the right things with buyers as they come in and move through the process and not just settling for minimal profits Beyond that Profit Magic helps dealers ensure that they are not risking potentially substantial fines legal fees or even jail time through compliance failures and the FTC and CFPB are on the hunt Nominations of Claude Allen, Thomas Scully, Piyosh Jindal, Linnet F. Deily, Peter Allgeier, Peter R. Fisher, and James Gurule United States. Congress. Senate. Committee on Finance, 2001 **Federal Register**, 2003

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