

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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Table of Contents Ofac Policy And Procedure Guide

1. Understanding the eBook Ofac Policy And Procedure Guide
 - The Rise of Digital Reading Ofac Policy And Procedure Guide
 - Advantages of eBooks Over Traditional Books
2. Identifying Ofac Policy And Procedure Guide
 - Exploring Different Genres
 - Considering Fiction vs. Non-Fiction
 - Determining Your Reading Goals
3. Choosing the Right eBook Platform
 - Popular eBook Platforms
 - Features to Look for in an Ofac Policy And Procedure Guide
 - User-Friendly Interface

4. Exploring eBook Recommendations from Ofac Policy And Procedure Guide
 - Personalized Recommendations
 - Ofac Policy And Procedure Guide User Reviews and Ratings
 - Ofac Policy And Procedure Guide and Bestseller Lists
5. Accessing Ofac Policy And Procedure Guide Free and Paid eBooks
 - Ofac Policy And Procedure Guide Public Domain eBooks
 - Ofac Policy And Procedure Guide eBook Subscription Services
 - Ofac Policy And Procedure Guide Budget-Friendly Options
6. Navigating Ofac Policy And Procedure Guide eBook Formats
 - ePub, PDF, MOBI, and More
 - Ofac Policy And Procedure Guide Compatibility with Devices
 - Ofac Policy And Procedure Guide Enhanced eBook Features
7. Enhancing Your Reading Experience
 - Adjustable Fonts and Text Sizes of Ofac Policy And Procedure Guide
 - Highlighting and Note-Taking Ofac Policy And Procedure Guide
 - Interactive Elements Ofac Policy And Procedure Guide
8. Staying Engaged with Ofac Policy And Procedure Guide
 - Joining Online Reading Communities
 - Participating in Virtual Book Clubs
 - Following Authors and Publishers Ofac Policy And Procedure Guide
9. Balancing eBooks and Physical Books Ofac Policy And Procedure Guide
 - Benefits of a Digital Library
 - Creating a Diverse Reading Collection Ofac Policy And Procedure Guide
10. Overcoming Reading Challenges
 - Dealing with Digital Eye Strain
 - Minimizing Distractions
 - Managing Screen Time
11. Cultivating a Reading Routine Ofac Policy And Procedure Guide
 - Setting Reading Goals Ofac Policy And Procedure Guide
 - Carving Out Dedicated Reading Time

12. Sourcing Reliable Information of Ofac Policy And Procedure Guide
 - Fact-Checking eBook Content of Ofac Policy And Procedure Guide
 - Distinguishing Credible Sources
13. Promoting Lifelong Learning
 - Utilizing eBooks for Skill Development
 - Exploring Educational eBooks
14. Embracing eBook Trends
 - Integration of Multimedia Elements
 - Interactive and Gamified eBooks

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