FAST TO FAST ENTERPRISE INC.

Master Compliance Manual 2026
AML • KYC • OFAC • Governance • Due Diligence

Executive Compliance Statement

FAST TO FAST ENTERPRISE INC. is committed to maintaining the highest standards of integrity, transparency, ethical conduct and regulatory compliance. The Company maintains a risk-based compliance framework designed to prevent money laundering, terrorist financing, sanctions violations, fraud, corruption, bribery and other financial crimes. Compliance considerations are incorporated into all significant business decisions.

Policy Requirements: Maintain records, cooperate with banking reviews, escalate unusual activity, document significant compliance decisions, and support lawful business operations.

Corporate Information

Legal Name: FAST TO FAST ENTERPRISE INC. Document Number: P24000004904. EIN: 99-0942746. Principal Office: 1011 Princenton Ave Lansing, MI 48915. Email: info@fasttofastenterprise.com. The Company is engaged in the international commercialization and distribution of merchandise, primarily food products and consumer goods, through retail and wholesale channels serving customers mainly in Panama, the Caribbean region, and other international markets. The Company manages sourcing, supplier relations, logistics, and distribution activities through established international trade networks.

Additionally, the Company coordinates and facilitates tourism-related services, including travel planning, accommodation arrangements, transportation logistics, excursions, and other travel support services. These activities are performed primarily for Latin American customers through a network of independent tourism service providers and strategic business partners. The Company's operations are predominantly international in nature and are not principally directed toward the United States domestic market.

Policy Requirements: Maintain records, cooperate with banking reviews, escalate unusual activity, document significant compliance decisions, and support lawful business operations.

Ownership and Governance

Alejandro Pestana Rosabal owns 100% of the shares and serves as President and Director. The Company currently has no employees and operates through its directors and independent contractors. The President serves as the Compliance Officer.

Policy Requirements: Maintain records, cooperate with banking reviews, escalate unusual activity, document significant compliance decisions, and support lawful business operations.

AML Program

The Company maintains a zero-tolerance approach toward money laundering and terrorist financing. All counterparties may be reviewed based on risk profile, ownership structure, business purpose, transaction activity and geographic exposure. The Company will not knowingly engage in transactions involving criminal proceeds or unlawful activity.

Policy Requirements: Maintain records, cooperate with banking reviews, escalate unusual activity, document significant compliance decisions, and support lawful business operations.

Risk Assessment Methodology

Risk reviews consider customer profile, industry sector, ownership transparency, source of funds, geographic exposure, sanctions risk, transaction volume and reputational concerns. Relationships may be classified as Low, Medium or High Risk and may be subject to enhanced review.

Policy Requirements: Maintain records, cooperate with banking reviews, escalate unusual activity, document significant compliance decisions, and support lawful business operations.

Customer Acceptance Policy

The Company reserves the right to reject, suspend or terminate any customer, supplier, contractor or business relationship presenting unacceptable legal, compliance, financial or reputational risk.

Policy Requirements: Maintain records, cooperate with banking reviews, escalate unusual activity, document significant compliance decisions, and support lawful business operations.

Customer Identification Program (CIP)

Before establishing a relationship, the Company may request legal name, address, registration records, government identification, beneficial ownership information and supporting commercial documentation.

Policy Requirements: Maintain records, cooperate with banking reviews, escalate unusual activity, document significant compliance decisions, and support lawful business operations.

Know Your Customer (KYC) Procedures

The Company seeks to understand ownership structure, business activities, expected transaction patterns, commercial rationale and source of funds. KYC information may be updated when material changes occur.

Policy Requirements: Maintain records, cooperate with banking reviews, escalate unusual activity, document significant compliance decisions, and support lawful business operations.

Beneficial Ownership Verification

Corporate counterparties may be required to disclose ultimate beneficial owners and controlling persons. Anonymous ownership structures are not accepted.

Policy Requirements: Maintain records, cooperate with banking reviews, escalate unusual activity, document significant compliance decisions, and support lawful business operations.

PEP Policy

Enhanced review may be conducted when dealing with politically exposed persons, senior government officials or related parties.

Policy Requirements: Maintain records, cooperate with banking reviews, escalate unusual activity, document significant compliance decisions, and support lawful business operations.

OFAC and Sanctions Compliance

The Company does not knowingly conduct business with sanctioned individuals, organizations, governments or restricted parties. Screening may be conducted before onboarding and periodically thereafter.

Policy Requirements: Maintain records, cooperate with banking reviews, escalate unusual activity, document significant compliance decisions, and support lawful business operations.

Source of Funds and Source of Wealth

The Company may request contracts, invoices, purchase orders, banking records, tax documentation and supporting commercial records to establish the lawful origin of funds.

Policy Requirements: Maintain records, cooperate with banking reviews, escalate unusual activity, document significant compliance decisions, and support lawful business operations.

International Payments Policy

International payments must relate to legitimate commercial activities and be supported by contracts, invoices, service agreements, commission agreements, reimbursement obligations or other documented business purposes. The Company does not provide public money transmission services.

Policy Requirements: Maintain records, cooperate with banking reviews, escalate unusual activity, document significant compliance decisions, and support lawful business operations.

Related Party Transactions

The Company may provide services to affiliated companies and strategic partners. Transactions must be commercially reasonable and supported by appropriate records and agreements.

Policy Requirements: Maintain records, cooperate with banking reviews, escalate unusual activity, document significant compliance decisions, and support lawful business operations.

Restricted Activities

The Company is not a bank, money transmitter, Money Services Business (MSB), escrow provider, payment processor, cryptocurrency exchange or investment manager. The Company does not hold customer deposits.

Policy Requirements: Maintain records, cooperate with banking reviews, escalate unusual activity, document significant compliance decisions, and support lawful business operations.

Anti-Bribery and Anti-Corruption

Bribery, kickbacks, facilitation payments and improper benefits are prohibited. Business decisions must be based on legitimate commercial considerations.

Policy Requirements: Maintain records, cooperate with banking reviews, escalate unusual activity, document significant compliance decisions, and support lawful business operations.

Third-Party Due Diligence

The Company may evaluate suppliers, contractors and strategic partners before engagement. Reviews may consider ownership, reputation, legal standing and business purpose.

Policy Requirements: Maintain records, cooperate with banking reviews, escalate unusual activity, document significant compliance decisions, and support lawful business operations.

Record Retention

Compliance, accounting, customer and transaction records shall generally be retained for at least five years or longer where required by law or contract.

Policy Requirements: Maintain records, cooperate with banking reviews, escalate unusual activity, document significant compliance decisions, and support lawful business operations.

Data Protection and Confidentiality

Confidential information shall be protected through reasonable administrative and operational safeguards and shared only for legitimate business purposes.

Policy Requirements: Maintain records, cooperate with banking reviews, escalate unusual activity, document significant compliance decisions, and support lawful business operations.

Compliance Red Flags

Examples include refusal to provide ownership information, unusual payment routing, unexplained third-party payments, inconsistent business explanations and transactions involving sanctioned jurisdictions.

Policy Requirements: Maintain records, cooperate with banking reviews, escalate unusual activity, document significant compliance decisions, and support lawful business operations.

Cuba Compliance Statement

The Company does not conduct business with the Government of Cuba, Cuban military entities, intelligence organizations, sanctioned state-owned enterprises or persons acting on behalf of sanctioned governmental institutions.

Policy Requirements: Maintain records, cooperate with banking reviews, escalate unusual activity, document significant compliance decisions, and support lawful business operations.

Annual Review

This manual shall be reviewed annually and updated when business activities, regulations or risk exposure materially change.

Policy Requirements: Maintain records, cooperate with banking reviews, escalate unusual activity, document significant compliance decisions, and support lawful business operations.

Certification & Adoption

Approved by Alejandro Pestana Rosabal, President & Director.
Signature: ________________
Date: 02/03/2025