HEALTHCARE SERVICE CORPORATION

CORPORATE POLICY

Title: OFAC AND USA PATRIOT ACT		**Policy No.: 9.03**
Owner/ Approval	**Blair Todt, SVP & Chief Legal Officer**	
Date of Last Review:	**February, 2017**	
Approval	**Thomas C. Lubben, SVP, CASSIP**	
Date of Last Review:	**February, 2017**	
New Policy ☐		
Revised ☒	**Replaces Policy No.: 9.03 (August 2007)**	

POLICY

HCSC's Code of Business Ethics and Conduct states that it is the policy of the Company to comply with all laws and regulations that apply to our business. Because of their importance and the severe criminal and civil penalties that may apply to the Company and its employees, HCSC has adopted specific policies and procedures regarding who HCSC can do business with to comply with OFAC and the USA Patriot Act. Failure to comply with these policies and procedures could subject employees to disciplinary action, up to and including termination of employment.

I. Overview

A. U.S. Department of Treasury and OFAC

The U.S Department of Treasury, through its Office of Foreign Asset Control ("OFAC"), is responsible for the enforcement of U.S. laws and Presidential Executive Orders that place sanctions and other restrictions on which U.S. Corporations and U.S citizens may do business with. OFAC administers and enforces economic and trade sanctions based on US foreign policy and national security goals against targeted foreign countries and regimes, terrorists, international narcotics traffickers, those engaged in activities related to the proliferation of weapons of mass destruction, and other threats to the national security, foreign policy or economy of the United States. Currently, these restrictions include the following:

1. Specially Designated Nationals ("SDNs") - individuals and entities located anywhere in the world that are considered "Blocked" by OFAC;
2. Blocked Country - a country sanction imposed resulting in economic sanctions and embargoes that target geographic regions and governments.

OFAC publishes and periodically updates list of these individuals and entities. These lists

are available at http://www.treas.gov/offices/enforcement/ofac/.. U.S. companies and U.S. citizens are prohibited from doing business with/or for any of the countries, individuals or entities that appear on the OFAC lists. Criminal and civil penalties are incurred and are based on whether the case was a voluntary vs non-voluntary disclosure and whether the case was egregious vs non-egregious.

B. USA Patriot Act and Anti-Money Laundering

In the wake of the events of September 11, 2001, Congress passed the USA Patriot Act, which places additional restrictions and requirements on HCSC. Among other things, the USA Patriot Act requires insurance companies to establish anti-money laundering programs. Money laundering is the process by which criminals and terrorists use legitimate financial mechanisms, including insurance, to conceal the movement of proceeds derived from specified illegal activities and to finance crime and terrorism. The USA Patriot Act contains additional requirements that currently apply to insurance companies or to certain activities of insurance companies. Health insurance companies are exempt from anti-money laundering program requirements but life insurance companies are not exempt.

II. OFAC Compliance

HCSC will perform the following functions to comply with the OFAC requirements:

1. On an on-going basis, Strategic Sourcing will screen all new vendors against the OFAC lists.
2. The Treasury Operations Department will review investment guidelines and investments to ensure that HCSC assets are not invested through or in entities on the OFAC list.
3. Human Resources through Security will screen every applicant and all Independent Contractors for employment against the OFAC lists.
4. All policyholders (group and individual) and all ASO groups will be screened before they are issued and at renewal.
5. All providers will be screened by the Credentialing Department before they enter our networks.
6. When claims for blocked countries, entities or persons are presented to the Fraud Control Unit & Ethics and Compliance, they will be investigated and a decision will be rendered regarding payment from Fraud & Compliance perspective.
7. Screening of the OFAC lists will be conducted before any charitable contribution of money or any other corporate assets is made.

In addition to upfront screening, batch screening (ongoing cumulative screening) will occur. Employees and vendor's cumulative files are batch screened weekly. Providers and Policyholders are batch screened monthly.

If an employee conducts any screening and finds that the entity or individual screened is listed on an OFAC list, the employee must complete the attached report (Exhibit B) within 24 hours of the screening and submit the report to HCSC's Ethics and Compliance Vice President. A copy of the report must also be provided to the employee's immediate supervisor.

In addition, if any employee has reason to suspect that HCSC is doing business with entities and/or individuals that may be engaged in suspicious activities or listed by OFAC, they should report this information immediately to their supervisor.

III. USA Patriot Act

Designation of Compliance Officer: The Compliance Officer shall be responsible for implementing and enforcing this policy as part of HCSC's Code of Business Ethics and Conduct.

Currency Transactions: Employees shall inform their supervisor and shall report immediately to HCSC Tax Department on the designated form (Exhibit B) information regarding all transactions, or two or more related transactions, involving $10,000 or more in cash or cash equivalents. Cash equivalents include traveler's checks, bank drafts, checks payable to bearer, and money orders. The Tax Department shall report the event to the appropriate governmental authorities within the required timeframes.

Suspicious Activity Reports (SARs): Employees shall report suspicious or questionable activities that may involve money laundering to their supervisors. A questionable, or "Red Flag" transaction, is a service request, policy activity or other transaction that, on the surface, may appear to be routine. However, its timing, form or some other element of the transaction could make it suspicious. Examples of suspicious or "Red Flag" transactions is attached as Exhibit A.

If there is clear evidence of fraud or immediate financial loss to HCSC, the employee should refer the case to their supervisor. The supervisor will review the transaction to see if further action needs to be taken and if patterns can be discerned. If further action needs to be taken, the supervisor shall notify their management and the Ethics and Compliance Vice President by completing the "OFAC Compliance and USA Patriot Act Report" (Exhibit B). The employee does not need to do an in-depth investigation. Ethics and Compliance will investigate or coordinate with the Fraud Department. HCSC's non-retaliation policy applies to employees reporting of red flag activities or transactions.

HCSC's Ethics and Compliance Department will determine whether to electronically file a Suspicious Activity Report (SAR) with the federal government, depending on the particular circumstances, corporate policy and privacy concerns. The SAR can be found on the US Department of the Treasury, Financial Crimes Enforcement Network, and BSA E-Filing System at http://bsaefiling.fincen.treas.gov/main.html. Certain affiliates, such as registered broker/dealers and credit unions, may be required by law to file SARs. These affiliates may file SARs directly with the federal government and will provide HCSC Ethics and Compliance Department with a copy of each filed SAR. Ethics and Compliance shall retain all documentation, records and communications regarding a reported transaction for the longer of the time required by law or HCSC's applicable record retention policy.

SARs are confidential and may not be disclosed to any person involved in the transaction. An employee shall use reasonable efforts not to arouse suspicion in the persons involved in the questionable transaction. If questioned by the person involved, an employee can say, "our procedures require that this transaction be reviewed with our management. We will contact you promptly if any delay is expected."

Cooperation with Government: The USA Patriot Act gives the federal government the right to request HCSC to search its records to determine if it maintains an account for or has engaged in a transaction with a specific individual, entity or organization. Employees are to contact the Legal Department & the Compliance Department immediately if they receive such a request. These departments will respond to the federal government. Any request for information from the federal government shall be kept confidential except to the extent necessary to fulfill the request or as required by law.

Anti-Money Laundering Recordkeeping and Monitoring: HCSC's anti-money laundering compliance activities, including documentation of currency transaction reports, reports of suspicious activity, customer documentation, screening of OFAC lists are required to be maintained for a period of 10 years. Treasury Operations will maintain Wire Transfer Logs for 10 years.

Independent Audit: Compliance with this policy may be audited as part of HCSC Corporate Compliance Program. External auditors may also include in their work program when reviewing responsible departments, a review of compliance with this policy and anti-money laundering procedures.

V. Subsidiaries and Affiliates

All subsidiaries and affiliates after a review of the legal and regulatory requirements that may apply to such subsidiary or affiliate and their products, shall adopt as necessary additional appropriate policies and procedures. Any policies or procedures that are in addition to this policy and procedure shall be reviewed by HCSC's Ethics and Compliance Department.

Exhibit A

MONEY LAUNDERING AND TERRORIST FINANCING

"RED FLAGS"

The following are examples of potentially suspicious activities, or “red flags” for both money laundering and terrorist financing. Although these lists are not all-inclusive, they may help banks and examiners recognize possible money laundering and terrorist financing schemes. FinCEN issues advisories containing examples of “red flags” to inform and assist banks in reporting instances of suspected money laundering, terrorist financing, and fraud. In order to assist law enforcement in its efforts to target these activities, FinCEN requests that banks check the appropriate box (es) in the Suspicious Activity Information section and include certain key terms in the narrative section of the SAR. The advisories and guidance can be found on FinCEN Web site.302 Management’s primary focus should be on reporting suspicious activities, rather than on determining whether the transactions are in fact linked to money laundering, terrorist financing, or a particular crime.

The following examples are red flags that, when encountered, may warrant additional scrutiny. The mere presence of a red flag is not by itself evidence of criminal activity. Closer scrutiny should help to determine whether the activity is suspicious or one for which there does not appear to be a reasonable business or legal purpose.

Potentially Suspicious Activity That May Indicate Money Laundering

Customers Who Provide Insufficient or Suspicious Information

- A customer uses unusual or suspicious identification documents that cannot be readily verified.
- A customer provides an individual taxpayer identification number after having previously used a Social Security number.
- A customer uses different taxpayer identification numbers with variations of his or her name.
- A business is reluctant, when establishing a new account, to provide complete information about the nature and purpose of its business, anticipated account activity, prior banking relationships, the names of its officers and directors, or information on its business location.
- A customer’s home or business telephone is disconnected.
- The customer’s background differs from that which would be expected on the basis of his or her business activities.
- A customer makes frequent or large transactions and has no record of past or present employment experience.
- A customer is a trust, shell company, or Private Investment Company that is reluctant to provide information on controlling parties and underlying beneficiaries. Beneficial owners may hire nominee incorporation services to establish shell companies and open bank accounts for those shell companies while shielding the owner’s identity.

Efforts to Avoid Reporting or Recordkeeping Requirement

- A customer or group tries to persuade a bank employee not to file required reports or maintain required records.
- A customer is reluctant to provide information needed to file a mandatory report, to have the report filed, or to proceed with a transaction after being informed that the report must be filed.

- A customer is reluctant to furnish identification when purchasing negotiable instruments in recordable amounts.
- A business or customer asks to be exempted from reporting or recordkeeping requirements.
- A person customarily uses the automated teller machine to make several bank deposits below a specified threshold.
- A customer deposits funds into several accounts, usually in amounts of less than $3,000, which are subsequently consolidated into a master account and transferred outside of the country, particularly to or through a location of specific concern (e.g., countries designated by national authorities and Financial Action Task Force on Money Laundering (FATF) as no cooperative countries and territories).
- A customer accesses a safe deposit box after completing a transaction involving a large withdrawal of currency, or accesses a safe deposit box before making currency deposits structured at or just under $10,000, to evade CTR filing requirements.

Funds Transfers

- Many funds transfers are sent in large, round dollar, hundred dollars, or thousand dollar amounts.
- Funds transfer activity occurs to or from a financial secrecy haven, or to or from a higher-risk geographic location without an apparent business reason or when the activity is inconsistent with the customer's business or history.
- Funds transfer activity occurs to or from a financial institution located in a higher risk jurisdiction distant from the customer's operations.
- Many small, incoming transfers of funds are received, or deposits are made using checks and money orders. Almost immediately, all or most of the transfers or deposits are wired to another city or country in a manner inconsistent with the customer's business or history.
- Large, incoming funds transfers are received on behalf of a foreign client, with little or no explicit reason.
- Funds transfer activity is unexplained, repetitive, or shows unusual patterns.
- Payments or receipts with no apparent links to legitimate contracts, goods, or services are received.
- Funds transfers are sent or received from the same person to or from different accounts.
- Funds transfers contain limited content and lack related party information.

Automated Clearing House Transactions

- Large-value, automated clearing house (ACH) transactions are frequently initiated through third-party service providers (TPSP) by originators that are not bank customers and for which the bank has no or insufficient due diligence.
- TPSPs have a history of violating ACH network rules or generating illegal transactions, or processing manipulated or fraudulent transactions on behalf of their customers.
- Multiple layers of TPSPs that appear to be unnecessarily involved in transactions.
- Unusually high level of transactions initiated over the Internet or by telephone.
- NACHA— The Electronic Payments Association (NACHA) information requests indicate potential concerns with the bank's usage of the ACH system.

Activity Inconsistent with the Customer's Business

- The currency transaction patterns of a business show a sudden change inconsistent with normal activities.

- A large volume of cashier's checks, money orders, or funds transfers is deposited into, or purchased through, an account when the nature of the accountholder's business would not appear to justify such activity.
- A retail business has dramatically different patterns of currency deposits from similar businesses in the same general location.
- Unusual transfers of funds occur among related accounts or among accounts that involve the same or related principals.
- The owner of both a retail business and a check-cashing service does not ask for currency when depositing checks, possibly indicating the availability of another source of currency.
- Goods or services purchased by the business do not match the customer's stated line of business.
- Payments for goods or services are made by checks, money orders, or bank drafts not drawn from the account of the entity that made the purchase.

Lending Activity

- Loans secured by pledged assets held by third parties unrelated to the borrower.
- Loan secured by deposits or other readily marketable assets, such as securities, particularly when owned by apparently unrelated third parties.
- Borrower defaults on a cash-secured loan or any loan that is secured by assets that are readily convertible into currency.
- Loans are made for, or are paid on behalf of, a third party with no reasonable explanation.
- To secure a loan, the customer purchases a certificate of deposit using an unknown source of funds, particularly when funds are provided via currency or multiple monetary instruments.
- Loans that lack a legitimate business purpose, provide the bank with significant fees for assuming little or no risk, or tend to obscure the movement of funds (e.g., loans made to a borrower and immediately sold to an entity related to the borrower).

Changes in Bank-to-Bank Transactions

- The size and frequency of currency deposits increases rapidly with no corresponding increase in noncurrency deposits.
- A bank is unable to track the true accountholder of correspondent or concentration account transactions.
- The turnover in large-denomination bills is significant and appears uncharacteristic, given the bank's location.
- Changes in currency-shipment patterns between correspondent banks are significant.

Cross-Border Financial Institution Transactions

- U.S. bank increases sales or exchanges of large denomination U.S. bank notes to Mexican financial institution(s).
- Large volumes of small denomination U.S. banknotes being sent from Mexican casas de cambio to their U.S. accounts via armored transport or sold directly to U.S. banks. These sales or exchanges may involve jurisdictions outside of Mexico.
- Casas de cambio direct the remittance of funds via multiple funds transfers to jurisdictions outside of Mexico that bear no apparent business relationship with the casas de cambio. Funds transfer recipients may include individuals, businesses, and other entities in free trade zones.

- Casas de cambio deposit numerous third-party items, including sequentially numbered monetary instruments, to their accounts at U.S. banks.
- Casas de cambio direct the remittance of funds transfers from their accounts at Mexican financial institutions to accounts at U.S. banks. These funds transfers follow the deposit of currency and third-party items by the casas de cambio into their Mexican financial institution.

Bulk Currency Shipments

- An increase in the sale of large denomination U.S. bank notes to foreign financial institutions by U.S. banks.
- Large volumes of small denomination U.S. bank notes being sent from foreign nonbank financial institutions to their accounts in the United States via armored transport, or sold directly to U.S. banks.
- Multiple wire transfers initiated by foreign nonbank financial institutions that direct U.S. banks to remit funds to other jurisdictions that bear no apparent business relationship with that foreign nonbank financial institution. Recipients may include individuals, businesses, and other entities in free trade zones and other locations.
- The exchange of small denomination U.S. bank notes for large denomination U.S. bank notes that may be sent to foreign countries.
- Deposits by foreign nonbank financial institutions to their accounts at U.S. banks that include third-party items, including sequentially numbered monetary instruments.
- Deposits of currency and third-party items by foreign nonbank financial institutions to their accounts at foreign financial institutions and thereafter direct wire transfers to the foreign nonbank financial institution's accounts at U.S. banks.

Trade Finance

- Items shipped that are inconsistent with the nature of the customer's business (e.g., a steel company that starts dealing in paper products, or an information technology company that starts dealing in bulk pharmaceuticals).
- Customers conducting business in higher-risk jurisdictions.
- Customers shipping items through higher-risk jurisdictions, including transit through noncooperative countries.
- Customers involved in potentially higher-risk activities, including activities that may be subject to export/import restrictions (e.g., equipment for military or police organizations of foreign governments, weapons, ammunition, chemical mixtures, classified defense articles, sensitive technical data, nuclear materials, precious gems, or certain natural resources such as metals, ore, and crude oil).
- Obvious over- or underpricing of goods and services.
- Obvious misrepresentation of quantity or type of goods imported or exported.
- Transaction structure appears unnecessarily complex and designed to obscure the true nature of the transaction.
- Customer requests payment of proceeds to an unrelated third party.
- Shipment locations or description of goods not consistent with letter of credit.
- Significantly amended letters of credit without reasonable justification or changes to the beneficiary or location of payment. Any changes in the names of parties should prompt additional OFAC review.

Insurance

- A customer purchases products with termination features without concern for the product's investment performance.
- A customer purchases insurance products using a single, large premium payment, particularly when payment is made through unusual methods such as currency or currency equivalents.
- A customer purchases a product that appears outside the customer's normal range of financial wealth or estate planning needs.
- A customer borrows against the cash surrender value of permanent life insurance policies, particularly when payments are made to apparently unrelated third parties.
- Policies are purchased that allow for the transfer of beneficial ownership interests without the knowledge and consent of the insurance issuer. This would include secondhand endowment and bearer insurance policies.
- A customer is known to purchase several insurance products and uses the proceeds from an early policy surrender to purchase other financial assets.
- A customer uses multiple currency equivalents (e.g., cashier's checks and money orders) from different banks and money services businesses to make insurance policy or annuity payments.

Shell Company Activity

- A bank is unable to obtain sufficient information or information is unavailable to positively identify originators or beneficiaries of accounts or other banking activity (using Internet, commercial database searches, or direct inquiries to a respondent bank).
- Payments to or from the company have no stated purpose, do not reference goods or services, or identify only a contract or invoice number.
- Goods or services, if identified, do not match profile of company provided by respondent bank or character of the financial activity; a company references remarkably dissimilar goods and services in related funds transfers; explanation given by foreign respondent bank is inconsistent with observed funds transfer activity.
- Transacting businesses share the same address, provide only a registered agent's address, or have other address inconsistencies.
- Unusually large number and variety of beneficiaries are receiving funds transfers from one company.
- Frequent involvement of multiple jurisdictions or beneficiaries located in higher-risk offshore financial centers.
- A foreign correspondent bank exceeds the expected volume in its client profile for funds transfers, or an individual company exhibits a high volume and pattern of funds transfers that is inconsistent with its normal business activity.
- Multiple high-value payments or transfers between shell companies with no apparent legitimate business purpose.
- Purpose of the shell company is unknown or unclear.

Employees

- Employee exhibits a lavish lifestyle that cannot be supported by his or her salary.
- Employee fails to conform to recognized policies, procedures, and processes, particularly in private banking.
- Employee is reluctant to take a vacation

• Employee overrides a hold placed on an account identified as suspicious so that transactions can occur in the account.

Other Unusual or Suspicious Customer Activity

• Customer frequently exchanges small-dollar denominations for large-dollar denominations.

• Customer frequently deposits currency wrapped in currency straps or currency wrapped in rubber bands that is disorganized and does not balance when counted.

• Customer purchases a number of cashier's checks, money orders, or traveler's checks for large amounts under a specified threshold.

• Customer purchases a number of open-end prepaid cards for large amounts. Purchases of prepaid cards are not commensurate with normal business activities.

• Customer receives large and frequent deposits from online payments systems yet has no apparent online or auction business.

• Monetary instruments deposited by mail are numbered sequentially or have unusual symbols or stamps on them.

• Suspicious movements of funds occur from one bank to another, and then funds are moved back to the first bank.

• Deposits are structured through multiple branches of the same bank or by groups of people who enter a single branch at the same time.

• Currency is deposited or withdrawn in amounts just below identification or reporting thresholds.

• Customer visits a safe deposit box or uses a safe custody account on an unusually frequent basis.

• Safe deposit boxes or safe custody accounts opened by individuals who do not reside or work in the institution's service area, despite the availability of such services at an institution closer to them.

• Customer repeatedly uses a bank or branch location that is geographically distant from the customer's home or office without sufficient business purpose.

• Customer exhibits unusual traffic patterns in the safe deposit box area or unusual use of safe custody accounts. For example, several individuals arrive together, enter frequently, or carry bags or other containers that could conceal large amounts of currency, monetary instruments, or small valuable items.

• Customer rents multiple safe deposit boxes to store large amounts of currency, monetary instruments, or high-value assets awaiting conversion to currency, for placement into the banking system. Similarly, a customer establishes multiple safe custody accounts to park large amounts of securities awaiting sale and conversion into currency, monetary instruments, outgoing funds transfers, or a combination thereof, for placement into the banking system.

• Unusual use of trust funds in business transactions or other financial activity.

• Customer uses a personal account for business purposes.

• Customer has established multiple accounts in various corporate or individual names that lack sufficient business purpose for the account complexities or appear to be an effort to hide the beneficial ownership from the bank.

• Customer makes multiple and frequent currency deposits to various accounts that are purportedly unrelated.

• Customer conducts large deposits and withdrawals during a short time period after opening and then subsequently closes the account or the account becomes dormant. Conversely, an account with little activity may suddenly experience large deposit and withdrawal activity.

• Customer makes high-value transactions not commensurate with the customer's known incomes.

Potentially Suspicious Activity That May Indicate Terrorist Financing

The following examples of potentially suspicious activity that may indicate terrorist financing are primarily based on guidance "Guidance for Financial Institutions in Detecting Terrorist Financing" provided by the FATF.303 FATF is an intergovernmental body whose purpose is the development and promotion of policies, both at national and international levels, to combat money laundering and terrorist financing.

Activity Inconsistent with the Customer's Business

• Funds are generated by a business owned by persons of the same origin or by a business that involves persons of the same origin from higher-risk countries (e.g., countries designated by national authorities and FATF as noncooperative countries and territories).

• The stated occupation of the customer is not commensurate with the type or level of activity.

• Persons involved in currency transactions share an address or phone number, particularly when the address is also a business location or does not seem to correspond to the stated occupation (e.g., student, unemployed, or self-employed).

• Regarding nonprofit or charitable organizations, financial transactions occur for which there appears to be no logical economic purpose or in which there appears to be no link between the stated activity of the organization and the other parties in the transaction.

• A safe deposit box opened on behalf of a commercial entity when the business activity of the customer is unknown or such activity does not appear to justify the use of a safe deposit box.

Funds Transfers

• A large number of incoming or outgoing funds transfers take place through a business account, and there appears to be no logical business or other economic purpose for the transfers, particularly when this activity involves higher-risk locations.

• Funds transfers are ordered in small amounts in an apparent effort to avoid triggering identification or reporting requirements.

• Funds transfers do not include information on the originator, or the person on whose behalf the transaction is conducted, when the inclusion of such information would be expected.

• Multiple personal and business accounts or the accounts of nonprofit organizations or charities are used to collect and funnel funds to a small number of foreign beneficiaries.

• Foreign exchange transactions are performed on behalf of a customer by a third party, followed by funds transfers to locations having no apparent business connection with the customer or to higher-risk countries.

Other Transactions That Appear Unusual or Suspicious

• Transactions involving foreign currency exchanges are followed within a short time by funds transfers to higher-risk locations.

• Multiple accounts are used to collect and funnel funds to a small number of foreign beneficiaries, both persons and businesses, particularly in higher-risk locations.

- A customer obtains a credit instrument or engages in commercial financial transactions involving the movement of funds to or from higher-risk locations when there appear to be no logical business reasons for dealing with those locations.
- Banks from higher-risk locations open accounts.
- Funds are sent or received via international transfers from or to higher-risk locations.
- Insurance policy loans or policy surrender values that are subject to a substantial surrender charge.

For additional information on “Red Flags” please see the US Department of the Treasury, Financial Crimes Enforcement Network at http://www.fincen.gov/about_fincen/wwd/.

Exhibit B

Date:
To: Ethics and Compliance Vice President
From:
Subject: OFAC Compliance and USA Patriot Act Suspicious Activity Report

Name:_____Ext._____

Location:_____

Department: _____

Immediate Supervisor: _____

Vice President: _____

Reason for Report:

_____Suspected Match to OFAC Lists _____Money-Laundering

_____Currency Transactions _____Other (please specify)

Match to OFAC Lists - Please provide the following information:

Name: _____

Address: _____

Social Security Number: _____

Entity/Individual is:

_____ Policyholder - type of product _____

_____Provider _____Vendor _____Other (Please specify)

_____Subscriber/Member - Please provide policy number and type of product

Currency Reporting - File this report with Compliance Department and Tax Department (Please describe in detail)

_____

_____

_____

Other Suspected Money Laundering or Suspicious Activities (please describe in detail)

_____

_____