WishLane — Independent Review Policy

Platform: WishLane (wishlane.com) **Business model:** Donation-based personal crowdfunding platform **Payments:** Stripe Connect (Express) + Stripe Checkout **Document type:** Compliance program — independent review / testing policy **Last updated:** July 4, 2026 **Owner / contact:** John Akyiano — jakyiano@gmail.com

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1. Purpose

This policy establishes that WishLane's risk-management and compliance program is subject to a periodic **independent review** — a test of whether the program's controls are designed appropriately and operating effectively — performed by a party independent of the program's day-to-day operation, and **conducted at least annually**. It defines what is reviewed, who may perform the review, how independence is ensured, and how findings and evidence are recorded.

2. Policy statement

WishLane will obtain an **independent review of its compliance policies and program at least once every twelve (12) months**, and additionally following any material change to the platform's payment flow, risk profile, or applicable law. Each review will be documented, its findings tracked to remediation, and the record retained as evidence.

3. What "independent" means

The reviewer must be **independent of the design and daily operation** of the controls being tested. Any of the following satisfies this requirement, in ascending order of assurance:

- A qualified **external party** — an AML/compliance consultant, an audit firm, or outside legal counsel.
- An **internal reviewer who is not responsible** for operating the controls under review and does not report to the person who is.

The reviewer must have access to the policies, the platform's controls and records, and the personnel needed to complete the review, and must be free to report findings without restriction.

4. Scope of review

Each independent review covers, at minimum:

Area	What is tested
Reliance on Stripe for KYC	That no recipient can receive funds before completing Stripe Connect Express verification
Held-funds model	That funds for unverified recipients are held and released only upon verification, and reconciled correctly
Contribution limits	That per-transaction, per-donor, and per-campaign caps are enforced before payment
Transaction monitoring	That the rule-based signals and AI-assisted analysis operate as documented and alerts are reviewed
Prohibited-use enforcement	That the Acceptable Use Policy is applied and prohibited campaigns are actioned
Dispute & refund handling	That refunds and disputes are reversed and reconciled correctly
Records & governance	That alerts, reviews, and resolutions are logged with reviewer identity and timestamps
Policy currency	That public policies (Terms, AUP, Refund, Privacy) are current and consistent with actual practice

5. Methodology

A review typically includes: a walkthrough of each control area against its documentation; sample testing of records (contributions, held-fund releases, monitoring alerts and their resolutions, refunds/disputes); a check that thresholds and configuration match the documented values; and an assessment of whether the program remains adequate for the platform's current risk profile.

6. Findings, remediation, and evidence

- Every review produces a **dated written record** — the reviewer, the period covered, scope, findings, and recommendations.
- Each finding is assigned an **owner and a remediation target**, and tracked to closure.
- The review record and remediation status are retained as the **evidence of independent review** and made available to payment partners or regulators on request.
- Records are logged in the accompanying **Compliance Review Log** (`docs/compliance-review-log.md`).

7. Cadence and triggers

- **Scheduled:** at least once every 12 months.
- **Event-driven:** additionally upon any material change to the payment flow (e.g., a change to the held-funds model), a significant change in transaction volume or risk profile, a relevant change in

law, or a material incident.

8. Ownership

The designated compliance contact (John Akyiano, jakyiano@gmail.com) owns this policy, arranges each review, tracks remediation, and retains the records. Where the compliance contact also operates the controls, the review itself must be performed by an independent party per Section 3.

This policy states WishLane's commitment to independent review of its compliance program. It is a forward-looking commitment; completed reviews and their dates are recorded separately in the Compliance Review Log and are the evidence of reviews actually performed.