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Global Financial Crimes

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To Whom it May Concern:

Bank of America Corporation, a bank holding company located in Charlotte, North Carolina, United States of America, and its subsidiaries (collectively “Bank of America”) make every effort to remain in compliance with laws and rules applicable to its business, including laws and rules relating to anti-money laundering and economic sanctions. Bank of America operates in 48 jurisdictions; the United States is its principal place of business.

The Federal Reserve, Office of the Comptroller of the Currency, Securities and Exchange Commission, Financial Industry Regulatory Authority, Commodities Futures Trading Commission, Consumer Financial Protection Bureau and various other federal and state banking and securities agencies regulate Bank of America in the United States. Outside the United States, Bank of America is regulated by various banking and securities regulatory agencies in each jurisdiction in which it does business.

It is the policy of Bank of America that it will not knowingly commit or facilitate financial crime by, at, or through its businesses; and, that it will fully cooperate within the bounds of the law with authorities conducting investigations into financial crime. In fulfilling this policy, Bank of America may terminate customer relationships based upon a suspicion of criminal activity, or upon a determination that a customer presents financial crimes risk outside the Company’s risk appetite. Bank of America does not arbitrarily de-risk portfolios of customers based upon perceived risks. Bank of America does not terminate customer relationships based upon race, color, religion, sex, marital status, age (provided the customer has reached the age to enter into contracts), familial status, disability, gender identity or sexual orientation.

It is also Bank of America’s policy to make every effort to fully comply with laws, rules and regulations relating to financial crimes, wherever it does business.

AML Program

Bank of America has developed and implemented a risk-based Anti-Money Laundering (“**AML**”) program designed to comply with AML laws and regulations in the U.S. and other applicable laws and regulations related to the prevention of money laundering in the jurisdictions where the firm operates. Bank of America’s AML program comprises AML policies, procedures, internal controls and systems, which include but are not limited to the following:

- Designation of a Global Head of Financial Crimes Compliance and related regional and legal entity AML Compliance officers who are responsible for coordinating and monitoring the day-to-day compliance with the AML Program for their areas;

- A customer identification program and procedures that include the identification and verification of the identity of beneficial owners of certain entity customers;
- Procedures, processes and systems to collect and refresh customer due diligence information; processes to assess risk at both the program and customer level;
- Risk-based procedures, processes and systems to monitor customer transactions and activity;
- Procedures, processes and systems to identify and report suspicious activity to appropriate regulatory authorities in accordance with applicable laws;
- Procedures, processes and systems to produce other required reports and keep required records; and
- Training and education of appropriate employees and related third parties in applicable aspects of AML laws, rules and regulations, as well as processes and methodologies to mitigate the risk of money laundering.

Bank of America does not do business with "shell banks."

Economic Sanctions Program

Bank of America is a U.S. headquartered corporation with global operations and is committed to full compliance with economic sanctions laws in the jurisdictions in which it operates, including sanctions administered and enforced by the U.S. Department of the Treasury's Office of Foreign Assets Control ("OFAC"), the United Nations Security Council, the European Union, and other sanctions programs imposed by governments in jurisdictions where the Company acts, as applicable (collectively, "Sanctions"). In this regard, Bank of America has implemented a risk-based compliance program reasonably designed to comply with applicable Sanctions requirements.

To the extent permitted by local law, Bank of America's Sanctions compliance program requires the Company and its employees, wherever located, to comply with Sanctions requirements and to take necessary steps to prevent the opening of accounts or the execution or facilitation of transactions for, on behalf of, or for the benefit of, a sanctioned individual, entity, country, region, or organization in violation of Sanctions.

As part of its compliance program, Bank of America has established standards by which it conducts economic sanctions scanning of both customer and transaction data to ensure that the Company does not transact or facilitate prohibited business with, on behalf of, or for the benefit of individuals or entities who are the target of Sanctions. Generally speaking, and on a risk-based approach, the Company scans customer data against relevant economic sanctions and government lists upon account opening, at the commencement of a servicing relationship, upon changes to existing customer data, as well as upon updates to Sanctions programs. In addition, and on a risk-based approach, transactions, including but not limited to wire transfers, vendor payments, company-issued checks, deposits, transfers and settlements of securities or other assets, and international automated clearinghouse transactions, are scanned through economic sanctions filters prior to entering or leaving customer accounts or entering or leaving the Company. Bank of America may, on a case-by case basis, request additional information about a transaction to confirm whether it is permissible for Bank of America to process such transaction under applicable sanctions regulations. Failure to provide requested information in a timely manner may delay Bank of America's processing of the transaction or could result in Bank of America refusing to process the transaction or blocking (*i.e.*, freezing) funds and reporting them to relevant government authorities, as required by applicable regulations.

Bank of America's AML and Economic Sanctions programs are subject to independent testing pursuant to a program administered by its Audit Department. For further details of the firm's AML and Economic Sanctions programs, please review Bank of America's Wolfsberg Group Financial Crime's Compliance Program Questionnaire.

Sincerely,

/s/ Paul Dougherty
Paul Dougherty, Managing Director
Global Financial Crimes Risk Executive