

Marcy Hingst
Managing Director
Global Financial Crimes Executive

Global Financial Crimes

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To Whom It May Concern:

Bank of America Corporation is a bank holding company headquartered in Charlotte, North Carolina, United States of America. Bank of America Corporation and its subsidiaries (collectively "Bank of America") make every effort to remain in compliance with applicable Anti- Money Laundering laws, rules and guidance in the jurisdictions in which it does business. Bank of America Corporation is regulated by the U.S. Federal Reserve Bank of Richmond. Bank of America is also regulated by various U.S. federal and state banking and securities regulators and other regulatory agencies, as well as other U.S. and non-U.S. governmental agencies that have supervisory authority over certain legal entities in those jurisdictions where Bank of America operates.

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 is comprised of AML policies, procedures, internal controls and systems, which include but are not limited to the following:

- Designation of a Global Financial Crimes Executive 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 legal 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;
- Prohibition on conducting business with Shell Banks;
- Independent audit and compliance testing to review and assess compliance with the AML program and applicable laws; and
- Training and education of appropriate employees and related third parties in applicable aspects of AML laws, rules and regulations, as well as the Company's processes and methodologies to mitigate the risk of money laundering.

As a US-headquartered company with global operations, the firm is also subject to the regulations administered by the U.S. Treasury Department's Office of Foreign Assets Control ("OFAC") and other sanctions regulators in the jurisdictions in which it operates. Bank of America has implemented policies and procedures reasonably designed to comply with the prohibitions and restrictions mandated by the sanctions laws and regulations applicable in the jurisdictions where the firm operates.

Compliance with our AML Program and related procedures ensures we remain in good standing in the jurisdictions where we conduct business and protects the firm from the risks associated with illicit finance. Mitigation of these risks involves, among other things, constant diligence and the ability to keep pace with the sophisticated schemes employed by criminals. Bank of America cooperates fully with investigations and inquiries from law enforcement and regulatory authorities pursuant to applicable laws and legal process.

For further details of the firm's AML Program, please review Bank of America's Wolfsberg Group Financial Crime's Compliance Program Questionnaire.

Sincerely,

/S/Marcy Hingst
Marcy Hingst, Managing Director
Global Financial Crimes Executive