

TRUIST

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To Whom It May Concern:

Truist Financial Corporation is a bank holding company headquartered in Charlotte, North Carolina, United States of America. Truist Financial Corporation and Truist Bank (a wholly owned subsidiary of Truist Financial Corporation) (collectively referred herein as “Truist”) are supervised by, among others, the Board of Governors of the Federal Reserve System (and specifically the Federal Reserve Bank of Richmond), The Federal Deposit Insurance Corporation, the North Carolina Office of the Commissioner of Banks, the Securities and Exchange Commission, the Commodity Futures Trading Commission and the Financial Industry Regulatory Authority. Truist Financial Corporation is publicly owned and listed on the New York Stock Exchange (symbol: TFC).

Truist has established and maintains an enterprise Anti-Money Laundering Program, designed to ensure, that at a minimum, Truist and all of its businesses, are in compliance with all applicable laws, rules and regulations related to anti-money laundering and anti-terrorist financing initiatives. Among other relevant laws, the Anti-Money Laundering Program ensures that Truist is in compliance with all applicable provisions of the Bank Secrecy Act and the USA Patriot Act.

Specifically, the Truist Anti-Money Laundering Program requires that Truist maintains a compliance program that provides for:

- A system of internal controls to ensure that appropriate due diligence, and when necessary, enhanced due diligence, including obtaining and maintaining appropriate documentation, is conducted at account opening and updated, as necessary, through the course of the customer relationship;
- The designation of an Anti-Money Laundering Compliance Officer, or other appropriate personnel, responsible for coordinating and monitoring day-to-day compliance with the Anti-Money Laundering Program and applicable laws, rules and regulations;

- Recordkeeping and reporting practices in accordance with the Anti-Money Laundering Program and applicable laws, rules and regulations;
- Appropriate methods of monitoring transactions and account relationships to identify potentially suspicious activity;
- Reporting of suspicious activity to governmental authorities in accordance with the Anti-Money Laundering Program and applicable laws, rules and regulations;
- Training of appropriate personnel with regard to anti-money laundering and anti-terrorist financing issues and their responsibilities for compliance; and
- Independent testing to ensure that the controls required by the Anti-Money Laundering Program and applicable laws, rules and regulations have been implemented and continue to be appropriately maintained.

All Truist businesses are required to maintain processes and procedures consistent with the Truist Anti-Money Laundering Policy to ensure compliance with the Truist Anti-Money Laundering Program.

Truist, and each of its businesses, have undertaken appropriate due diligence to know its customers. The Truist Anti-Money Laundering Program prohibits Truist businesses from entering into any relationships with shell banks and, therefore, there is no reason to believe that any customers of Truist are prohibited shell banks. Similarly, Truist takes all necessary and reasonable steps to ensure that it does not engage in any activities with any individuals, companies, entities or organizations named on any available government lists of known or suspected terrorists or terrorist organizations or appearing on any list of sanctioned persons issued by the United States or the government of a jurisdiction in which Truist business may operate.

Truist recognizes, and takes very seriously, its obligation to join with governmental and regulatory authorities and other members of the financial industry to help close off the financial channels that terrorists and money launderers use for their illicit purposes.

Sincerely,



Richard A. Small