

[illegible]

Title Block	
Document Name: Bank Secrecy Act & Anti-Money Laundering Policy	Document Number:
	Dept./Individual Responsible for Maintaining/Updating: BSA Officer
Board Approval Date: 3/16/2022	Review Cycle Schedule: Annually

BSA and AML Policy**Bank Secrecy Act and Anti-Money Laundering Policy****PURPOSE**

The Bank Secrecy Act (BSA) and the corresponding regulations issued by the Department of the Treasury require banks to file reports of each single or multiple deposits, withdrawal, exchange of currency, or other payment or transfer by, through, or to the bank which involves a transaction in currency of more than \$10,000. In addition to the reporting requirements, the BSA regulations require banks to keep a variety of internal records on designated transactions to provide an audit trail for FinCEN to use during criminal investigations.

This policy and procedures reflect Bank Secrecy and Anti-Money Laundering risks facing our bank as identified from our ongoing risk assessment. The risk assessment addresses, at a minimum, factors such as customer base, products and services offered, and geographic locations of our offices, customer base and transactions conducted at or through our bank.

ANTI-MONEY LAUNDERING

Money laundering is a diverse and often complex process. It involves three independent steps that often occur simultaneously:

- Placement – Physically placing bulk cash proceeds.
- Layering – Separating the proceeds from criminal activity from their origins through layers of complex financial transactions.
- Integration – Providing an apparently legitimate explanation for the illicit proceeds.

For money laundering to be successful, there must be no "paper trail" to connect the three steps of this process. The Bank Secrecy Act requirements must be evaded, manipulated, or ignored.

It is our bank's intent to assist the federal government in its anti-money laundering efforts by:

- Filing all appropriate reports in a timely fashion
- Following all Treasury Department guidance related to the Bank Secrecy Act
- Having an effective BSA compliance program
- Establishing an effective Customer Identification Program
- Establishing a customer due diligence program
- Being aware of parties to large-value funds transfers
- Filing Currency Transaction Reports (CTRs) and Suspicious Activity Reports (SARs)
- Adhering to USA PATRIOT Act provisions regarding information sharing
- Adhering to USA PATRIOT Act provisions regarding correspondent banks

BSA & Anti-Money Laundering Policy

Our financial institution implements and maintains an anti-money laundering program that:

- (a) Complies with the requirements of the Bank Secrecy Act
- (b) Includes, at a minimum:
 - (1) A system of internal controls to assure ongoing compliance;
 - (2) Independent testing for compliance to be conducted by bank personnel or by an outside party;
 - (3) Designation of an individual or individuals responsible for coordinating and monitoring day-to-day compliance;
 - (4) Training for appropriate personnel; and
 - (5) Appropriate risk-based procedures for conducting ongoing customer due diligence, to include, but not limited to:
 - (i) Understanding the nature and purpose of customer relationships for the purpose of developing a customer risk profile; and
 - (ii) Conducting ongoing monitoring to identify and report suspicious transactions and, on a risk basis, to maintain and update customer information. For purpose of this paragraph (b)(5)(ii), customer information shall include information regarding the beneficial owners of legal entity customers; and
- (c) Complies with the regulation of its Federal functional regulator governing such programs.

BSA PROGRAM

Our bank will comply with the Bank Secrecy Act and the anti-money laundering (AML) regulations by maintaining a written program to promote compliance that includes the following:

Internal Controls

A system of internal controls designed to

- Identify reportable and/or recordable transactions at a point where all of the information necessary to complete the required reporting/recording forms properly can be obtained.
- Ensure that all required reports/records are completed accurately and properly filed.
- Ensure that customer exemptions are properly granted and recorded.
- Provide for adequate supervision of employees who engage in activities covered by the regulation.
- Establish dual controls and provide for separation of duties.



BSA & Anti-Money Laundering Policy**Independent Testing**

A method of independent testing for compliance conducted by bank personnel or by an outside party will determine if all required information is being collected, and will review the procedures and documentation of this process. Items included in this testing process are

- A test of the internal control procedures including interviews of applicable employees
- A sampling of large currency transactions and corresponding review of CTR filings
- A test of the validity and reasonableness of granted exemptions
- A review of SARs filed and the required Board reporting
- Purchases of Monetary Instruments Reports
- Information sharing with the Government
- Information sharing with Other Financial Institutions (if necessary)
- Customer Identification Program (CIP) requirements
- Office of Foreign Asset Control
- Wire Transfer Records
- Training
- A test of the bank's record keeping system for compliance with the regulations
- Documentation of the scope and findings of the testing
- Reporting to the Board of Directors of any noted violations, exceptions, or problems with compliance

DESIGNATION OF A BSA COMPLIANCE OFFICER

The bank will designate an individual of bank officer status with the responsibility for coordinating and monitoring compliance with BSA. The assignment of this duty will be reviewed each year by the Board of Directors prior to official redesignation. Designation of the BSA officer will be recorded in the Board meeting minutes. In addition, the BSA officer will give an individual(s) in each office or department the responsibility for day-to-day compliance.

The bank will designate an individual of bank officer status with the responsibility for coordinating and monitoring compliance with the USA PATRIOT Act and its provisions relating to anti-money laundering. The assignment of this duty will be reviewed each year by the Board of Directors prior to official redesignation. Designation of the anti-money laundering officer will be recorded in the Board meeting minutes.

The Bank's BSA/AML Officer is Kim Nordstrom. In the event Ms. Nordstrom cannot carry out the duties associated with being the BSA/AML Officer, Teresa Guy will be her back-up.

TRAINING

The bank will train all employees at least annually in all the requirements of the BSA. The BSA Officer will maintain a file that documents

BSA & Anti-Money Laundering Policy

- The date training occurs
- The name and affiliation of the individual that performed the training
- Training content, including copies of all training material including manuals used in the training
- The names of all employees that attended the training session

The bank will train all employees (as appropriate to their daily duties) to identify and report to the BSA Officer the following types of suspicious transactions:

- Structuring transactions
- Concentration accounts
- Transactions inconsistent with the nature of the customer's normal account practices
- Transactions inconsistent with the nature of a customer's stated business purpose
- Unusual wire activities

Training will be bank-wide and will include

- The BSA;
- BSA requirements and procedures for CTRs;
- CTR exemptions;
- SAR requirements;
- Cash purchase of monetary instrument requirements;
- Wire transfer requirements;
- Additional records required by the BSA;
- Record retention requirements;
- The bank's AML procedures;
- CIP and procedures; and
- Office of Foreign Assets Control (OFAC) procedures.

In addition, the bank will circulate all regulatory and/or government issuances addressing these topics to the appropriate personnel, including

- Tellers
- New accounts personnel
- All personnel who handle currency transactions
- Lending personnel
- Data processing/accounting personnel
- Wire transfer personnel
- New employees
- Updates to executives required by changes and new developments in regulation
- Safe deposit box activity
- Correspondent banking area

All new employees will receive BSA training from the BSA Officer upon hiring, and will be required to complete all necessary follow-up training in a timely manner.

BSA & Anti-Money Laundering Policy

This program will be approved by the Board of Directors and this approval will be noted in the Board meeting minutes.

MISCELLANEOUS TRANSACTION RECORDING**Cash Sales of Monetary Instruments**

Our employees/tellers will record all aggregate cash purchases in amounts of \$3,000 to \$10,000, inclusive for cashier's checks, money orders, traveler's checks, and their equivalents. The employee or teller performing the transaction is responsible for the collection of the appropriate information, and completing the Cash Sales of Monetary Instruments log. The BSA officer will periodically verify the adequacy of this procedure and ensure that the bank maintains these records for a period of five years.

The information that the bank will record and retain depends upon whether or not the purchaser is an accountholder.

If the purchaser is an accountholder, the bank will record and retain the following:

- The purchaser's name
- The date of the purchase
- The type of instruments purchased
- The serial numbers of the instruments
- The dollar amount purchased with currency
- A verification that the individual is an accountholder

If the purchaser is not an accountholder, a customer whose only account relationship with the bank is a loan, the bank will record and retain the following:

- The purchaser's name and address
- The purchaser's Social Security number
- The purchaser's date of birth
- The date of purchase
- The type of instruments purchased
- The serial numbers of the instruments
- The dollar amount of each of the instruments purchased in currency
- A verification of the name and address of the purchaser

Other Records

Personnel will also record and retain these additional records for a period of five years:

BSA & Anti-Money Laundering Policy

- A record of each extension of credit (except for extensions of credit secured by an interest in real property) over \$10,000, which include the following:
 - The customer's name
 - The customer's address
 - The amount of the loan
 - The purpose of the loan
 - The date of the loan
- Each advice, request, or instruction received or given regarding any transaction resulting in the transfer of currency, funds, checks, investment securities, or credit of more than \$10,000 to or from any person, account, or place outside the United States
- Each advice, request, or instruction given to another financial institution or other person located within or outside of the United States regarding a transaction intended to result in the transfer of funds, currency, checks, investment securities, or credit of more than \$10,000 to a person, account, or place outside the United States

CURRENCY TRANSACTION REPORTING

In order to ensure that the bank reports all cash transactions, including total multiple transactions by or on behalf of any one person of more than \$10,000 during any one business day, to FINCEN, the bank will implement the following operating procedures:

- The Proof Currency Transaction Report from the computer system will be set up to identify transactions which, in aggregate for a customer, exceed \$3,000. This report is generated each morning for the previous day's activity. For transactions over \$10,000, a CTR will be prepared by a teller and reviewed and submitted electronically by the BSA Officer. The Proof Currency Transaction Report includes amounts under the \$10,000 threshold to help identify structuring transactions. This report is reviewed, initialed and filed by the BSA officer, or their designee, who then determines if any CTR filings are needed. CTR's will be filed electronically on the FinCEN website within the required 15 calendar day time frame. If a CTR is not filed in the appropriate time frame, the BSA Officer will contact the help desk at FinCEN for instructions to back-file the CTR.

Currency transactions with the Federal Reserve Bank, the Federal Home Loan Bank, or other domestic banks are exempted from the regulation's reporting requirements. However, the bank will maintain the name and address of any domestic bank with which it has currency transactions on the bank's exemption list.

IDENTIFICATION REQUIRED

All personnel will verify the identity of the individual before concluding any transaction that requires recording or reporting by verifying the name, street address, account number, taxpayer identification number, and type of employment of the individual and the party on whose behalf

BSA & Anti-Money Laundering Policy

the transaction is taking place, if applicable. The specific identifying information used (generally this will be a driver's license number) will be recorded for these types of transactions.

The only acceptable forms of identification for our bank are

- A valid state-issued ID
- A military ID
- A passport

No other alternative forms of identification are acceptable.

No exceptions to this policy are permitted.

EXEMPT PERSONS

The Bank, on a case by case basis, will grant exemptions to those businesses who deposit large amounts of cash on a regular basis. The accounts will be analyzed to verify the customer is not structuring their transactions, and must be in good standing with the bank. A spreadsheet will be maintained for those accounts on the exempt list to monitor cash transactions. The BSA Officer will review each exempt account on an annual basis to ensure the exemption is still valid and there has been no suspicious activity conducted through the exempt account.

SUSPICIOUS ACTIVITY REPORTING

Suspicious transactions that involve potential money laundering or violate the Bank Secrecy Act must be properly reported. A Suspicious Activity Report (SAR) will be completed for any type of transaction (not just a currency transaction) aggregating \$5,000 or more conducted or attempted to be conducted by, at, or through the bank, where the bank knows, suspects, or has reason to suspect that

- The transaction involves funds derived from illegal activities or is intended or conducted in order to hide or disguise funds or assets derived from illegal activities as part of a plan to violate or evade any law or regulation or to avoid any transaction reporting requirement under federal law;
- The transaction is designed to evade any Bank Secrecy Act regulations; or
- The transaction has no business or apparent lawful purpose or is not the sort in which the particular customer would normally be expected to engage, and the bank knows of no reasonable explanation for the transaction after examining the available facts (including the background and possible purpose of the transaction).

The BSA Officer will also file a SAR for any suspicious transactions that involve any officer, director, or employee, regardless of the amount involved in the suspicious activity.

BSA & Anti-Money Laundering Policy

The BSA Officer completes the Suspicious Activity Report and obtains a secondary review by the bank's president. The review date and date mailed are noted on the bank's copy of the Report. The BSA Officer will file the appropriately completed Suspicious Activity Report within 30 calendar days of the date of the initial detection of the facts that trigger the reporting requirement. In cases where the suspect or group of suspects is not known, the bank may delay filing the SAR up to 60 calendar days. Should continuing suspicious activity occur, the BSA Officer will file follow up SARs at least every 90 days. After filing one follow up SAR, the bank will terminate its relationship with the reported party, unless continuation of the relationship is requested by law enforcement. The SARs will be filed electronically with the Financial Crimes Enforcement Network (FinCEN) of the Department of the Treasury.

All staff members are urged to be vigilant and to be aware of any unusual activity that may be related to money laundering and/or terrorist activity. Should any staff member suspect or discover any of these activities, the information will be communicated immediately to the BSA officer. Such referrals will be documented on a Suspicious Activity Referral Form and forwarded to the BSA Officer, who will review the activity and make a determination on whether a SAR is required. In instances where a SAR is considered, but not filed, the BSA Officer will document the reasons supporting decision not to file a SAR. This information is extremely sensitive, and no general discussion with any additional parties shall take place. Violation of this rule will be subject to disciplinary action.

The bank will designate personnel who will be responsible for reviewing the following reports and activities to identify suspicious transactions:

- New accounts reports
- Large CTRs
- Currency transaction aggregation reports
- Wire transfer logs
- Monetary instrument sales activity involving currency

The personnel designated to review these reports will document their review work by keeping a log of what they examined, the date, and the results of their review. Any suspicious transactions must be reported to the BSA Officer so that appropriate SAR activity takes place.

All Subpoena's and National Security Letters (NSL) must be reviewed by the BSA Officer to enable them to determine whether a SAR may be needed. Information included in NSL's must remain confidential. If the BSA Officer decides that a SAR needs to be filed, it must be filed within 30 calendar days of the initial detection of the facts that trigger the reporting requirement. If a SAR is filed as a result of the receipt of a NSL, there will be no mention of the NSL in the SAR. The SAR will only reference the activities that support the finding of suspicious transactions.

The Board will be notified of the filing of a SAR. To maintain confidentiality, the Board minutes will not contain any specific information regarding the details of the filing.

BSA & Anti-Money Laundering Policy

In the event it is necessary to file a SAR on a board member or executive officer, notification to the board should be handled differently than noted above in order to avoid violating Federal laws that prohibit notifying a suspect or person involved in the suspicious transaction. In these situations appropriate senior personnel, not involved in the suspicious activity, will be advised of the SAR filing and this process will be documented.

CUSTOMER IDENTIFICATION PROGRAM

Our bank has developed our Customer Identification Program procedures based on our bank's assessment of the risks presented by the various types of accounts we maintain, various methods of opening accounts, types of identifying information available that the bank accepts, our bank's location, size, and customer base. Our bank will use these procedures for any customer seeking to open an account.

DEFINITIONS

For purposes of this section of the policy:

Account means a formal ongoing banking relationship for financial transactions, including deposit accounts, credit and loan accounts. It also includes safety deposit box or other safekeeping services, or cash management, custodian, and trust services.

Account does not include any product or service where a formal banking relationship is not established with a person, including non-customer check-cashing, wire transfer, or sales of a check or money order. Also excluded are accounts that the bank acquires through an acquisition, merger, purchase of assets, or assumption of liabilities; or accounts opened for the purpose of participating in an employee benefit plan established under the Employee Retirement Income Security Act of 1974.

Bank means a bank that is subject to regulation by a Federal functional regulator; and credit unions, private banks, and trust companies that do not have a Federal functional regulator.

Customer means a person that opens a new account; and any individual who opens a new account for another individual who lacks legal capacity, such as a minor; or opens an account for an entity that is not a legal person, such as a civic club.

Customer does not include another bank, or a person that has an existing account with the bank, if the bank has a reasonable belief that it knows the true identity of the person.

Taxpayer identification number is defined by the Internal Revenue Code of 1986, and consists of either a social security number or employer identification number.

U.S. person means a United States citizen or a person other than an individual (such as a corporation, partnership, or trust) that is established or organized under the laws of a State or the United States.

BSA & Anti-Money Laundering Policy

Non-U.S. person means a person that is not a U.S. person.

IDENTITY VERIFICATION PROCEDURES

Our bank will use the following procedures to ascertain and verify the true identity of the individual(s) and/or stated business purpose of each commercial enterprise with whom the bank conducts business, to the extent reasonable and practicable.

For any customer seeking to open an account, bank personnel must gather the following information to determine true identity. Bank personnel will obtain an acceptable photo ID to gather, at a minimum, the following:

- Name;
- Date of birth, for an individual;
- Address, which shall be:
 - For an individual, a residential or business street address;
 - For an individual who does not have a residential or business street address,
 - An Army Post Office (APO) or Fleet Post Office (FPO) box number, or
 - The residential or business street address of next of kin or of another contact individual;
 - For a person other than an individual (such as a corporation, partnership, or trust), a principal place of business, local office, or other physical location; and
- Identification number, which shall be:
 - For a U.S. person, a taxpayer identification number; or
 - For a non-U.S. person, one or more of the following:
 - A taxpayer identification number;
 - Passport number and country of issuance;
 - Alien identification card number; or
 - Number and country of issuance of any other government-issued document evidencing nationality or residence and bearing a photograph or similar safeguard.

If the customer does not have the minimum information our bank requires, we will not open an account.

VERIFICATION

Verification through Documents. Our account opening personnel will request the following documents to verify true identity. These documents may include

- For individuals: unexpired government-issued identification evidencing nationality or residence and bearing a photograph or similar safeguard.

BSA & Anti-Money Laundering Policy

- For corporations, partnerships, trusts and persons other than individuals: documents showing the existence of the entity, such as registered articles of incorporation, a government-issued business license, partnership agreement, or trust instrument.
 - Additionally, for non-individuals, there may be times when our bank will gather additional information based on the risk level of the account type.

Non-Documentary Verification. If the customer does not have documents acceptable to our bank to assist in verifying identity, our bank will not open the account.

Our bank does not open accounts for new customers through the internet or via telephone or mail solicitation. The customer must be present to open an account.

For a non-individual account in which verification through documents and/or non-documents does not satisfactorily verify identity, our bank will require additional information such as verifying information about all individuals with authority or control over the account as well as all signatories.

New account personnel will gather additional information as required by our bank's risk assessment of its accounts, regardless of how the account is opened. This includes any account type identified by our bank's BSA and anti-money laundering program as high risk.

Only the Bank Secrecy Officer will make the decision as to whether this type of verification method will be used.

LEGAL ENTITIES AND BENEFICIAL OWNERSHIP

(a)In general. Our policy is to identify and verify beneficial owners of legal entity customers and to include such procedures in their anti-money laundering compliance program required under 31 U.S.C. 5318(h) and its implementing regulations.

(b)Identification and verification. With respect to legal entity customers, we shall enable the institution to:

- (1)Identify the beneficial owner(s) of each legal entity customer at the time a new account is opened, unless the customer is otherwise excluded. We may accomplish this either by obtaining a certification in the form of appendix A of this section from the individual opening the account on behalf of the legal entity customer, or by obtaining from the individual the information required by the form by another means, provided the individual certifies, to the best of the individual's knowledge, the accuracy of the information; and
- (2)We will verify the identity of each beneficial owner, according to risk-based procedures to the extent reasonable and practicable. At a minimum, these procedures will contain the elements required for verifying the identity of customers that are individuals. Our institution may rely on the information supplied by the legal entity

BSA & Anti-Money Laundering Policy

customer regarding the identity of its beneficial owner or owners, provided that it has no knowledge of facts that would reasonably call into question the reliability of such information.

(c)Account. For purposes of this section, account means Account means a formal banking relationship established to provide or engage in services, dealings, or other financial transactions including a deposit account, a transaction or asset account, a credit account, or other extension of credit. Account also includes a relationship established to provide a safety deposit box or other safekeeping services, or cash management, custodian, prepaid cards and trust services.

(d)Beneficial owner. For purposes of this section, beneficial owner means each of the following:

- (1)Each individual, if any, who, directly or indirectly, through any contract, arrangement, understanding, relationship or otherwise, owns 25 percent or more of the equity interests of a legal entity customer; and
- (2)A single individual with significant responsibility to control, manage, or direct a legal entity customer, including:
 - (i)An executive officer or senior manager (e.g., a Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Managing Member, General Partner, President, Vice President, or Treasurer); or
 - (ii)Any other individual who regularly performs similar functions.
- (3)If a trust owns directly or indirectly, through any contract, arrangement, understanding, relationship or otherwise, 25 percent or more of the equity interests of a legal entity customer, the beneficial owner for purposes of paragraph (d)(1) of this section shall mean the trustee. If an entity listed in paragraph (e)(2) of this section owns directly or indirectly, through any contract, arrangement, understanding, relationship or otherwise, 25 percent or more of the equity interests of a legal entity customer, no individual need be identified for purposes of paragraph (d)(1) of this section with respect to that entity's interests.

Note to paragraph (d). The number of individuals that satisfy the definition of "beneficial owner," and therefore must be identified and verified pursuant to this section, may vary. Under paragraph (d)(1) of this section, depending on the factual circumstances, up to four individuals may need to be identified. Under paragraph (d)(2) of this section, only one individual must be identified. It is possible that in some circumstances the same person or persons might be identified pursuant to paragraphs (d)(1) and (2) of this section. A covered financial institution may also identify additional individuals as part of its customer due diligence if it deems appropriate on the basis of risk.

(e)Legal entity customer. For the purposes of this section:

- (1)*Legal entity customer* means a corporation, limited liability company, or other entity that is created by the filing of a public document with a Secretary of State or similar

BSA & Anti-Money Laundering Policy

office, a general partnership, and any similar entity formed under the laws of a foreign jurisdiction that opens an account.

- (2) *Legal entity customer* does not include:
 - (i) A financial institution regulated by a Federal functional regulator or a bank regulated by a State bank regulator;
 - (ii) A person described in § 1020.315(b)(2) through (5) of this chapter;
 - (iii) An issuer of a class of securities registered under section 12 of the Securities Exchange Act of 1934 or that is required to file reports under section 15(d) of that Act;
 - (iv) An investment company, as defined in section 3 of the Investment Company Act of 1940, that is registered with the Securities and Exchange Commission under that Act;
 - (v) An investment adviser, as defined in section 202(a)(11) of the Investment Advisers Act of 1940, that is registered with the Securities and Exchange Commission under that Act;
 - (vi) An exchange or clearing agency, as defined in section 3 of the Securities Exchange Act of 1934, that is registered under section 6 or 17A of that Act;
 - (vii) Any other entity registered with the Securities and Exchange Commission under the Securities Exchange Act of 1934;
 - (viii) A registered entity, commodity pool operator, commodity trading advisor, retail foreign exchange dealer, swap dealer, or major swap participant, each as defined in section 1a of the Commodity Exchange Act, that is registered with the Commodity Futures Trading Commission;
 - (ix) A public accounting firm registered under section 102 of the Sarbanes–Oxley Act;
 - (x) A bank holding company, as defined in section 2 of the Bank Holding Company Act of 1956 (12 U.S.C. 1841) or savings and loan holding company, as defined in section 10(n) of the Home Owners' Loan Act (12 U.S.C. 1467a(n));
 - (xi) A pooled investment vehicle that is operated or advised by a financial institution excluded under paragraph (e)(2) of this section;
 - (xii) An insurance company that is regulated by a State;
 - (xiii) A financial market utility designated by the Financial Stability Oversight Council under Title VIII of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010;
 - (xiv) A foreign financial institution established in a jurisdiction where the regulator of such institution maintains beneficial ownership information regarding such institution;
 - (xv) A non-U.S. governmental department, agency or political subdivision that engages only in governmental rather than commercial activities; and
 - (xvi) Any legal entity only to the extent that it opens a private banking account subject to § 1010.620 of this chapter.
- (3) The following legal entity customers are subject only to the control prong of the beneficial ownership requirement:
 - (i) A pooled investment vehicle that is operated or advised by a financial institution not excluded under paragraph (e)(2) of this section; and
 - (ii) Any legal entity that is established as a nonprofit corporation or similar entity and has filed its organizational documents with the appropriate State authority as necessary.

BSA & Anti-Money Laundering Policy

(f) Covered financial institution. For the purposes of this section, covered financial institution has the meaning set forth in § 1010.605(e)(1) of this chapter.

(g) New account. For the purposes of this section, new account means each account opened at a covered financial institution by a legal entity customer on or after the applicability date.

(h) Exemptions. (1) Covered financial institutions are exempt from the requirements to identify and verify the identity of the beneficial owner(s) set forth in paragraphs (a) and (b)(1) and (2) of this section only to the extent the financial institution opens an account for a legal entity customer that is:

- (i) At the point-of-sale to provide credit products, including commercial private label credit cards, solely for the purchase of retail goods and/or services at these retailers, up to a limit of \$50,000;
 - (ii) To finance the purchase of postage and for which payments are remitted directly by the financial institution to the provider of the postage products;
 - (iii) To finance insurance premiums and for which payments are remitted directly by the financial institution to the insurance provider or broker;
 - (iv) To finance the purchase or leasing of equipment and for which payments are remitted directly by the financial institution to the vendor or lessor of this equipment.
- (2) *Limitations on Exemptions.* (i) The exemptions identified in paragraphs (h)(1)(ii) through (iv) of this section do not apply to transaction accounts through which a legal entity customer can make payments to, or receive payments from, third parties.
 - (ii) If there is the possibility of a cash refund on the account activity identified in paragraphs (h)(1)(ii) through (iv) of this section, then beneficial ownership of the legal entity customer must be identified and verified by the financial institution as required by this section, either at the time of initial remittance, or at the time such refund occurs.

(i) Recordkeeping. A covered financial institution must establish procedures for making and maintaining a record of all information obtained under the procedures implementing paragraph (b) of this section.

- (1) *Required records.* At a minimum the record must include:
 - (i) For identification, any identifying information obtained by the covered financial institution pursuant to paragraph (b) of this section, including without limitation the certification (if obtained); and
 - (ii) For verification, a description of any document relied on (noting the type, any identification number, place of issuance and, if any, date of issuance and expiration), of any non- documentary methods and the results of any measures undertaken, and of the resolution of each substantive discrepancy.
- (2) *Retention of records.* A covered financial institution must retain the records made under paragraph (i)(1)(i) of this section for five years after the date the account is closed, and the records made under paragraph (i)(1)(ii) of this section for five years after the record is made.

BSA & Anti-Money Laundering Policy

(j)Reliance on another financial institution. A covered financial institution may rely on the performance by another financial institution (including an affiliate) of the requirements of this section with respect to any legal entity customer of the covered financial institution that is opening, or has opened, an account or has established a similar business relationship with the other financial institution to provide or engage in services, dealings, or other financial transactions, provided that:

- (1)Such reliance is reasonable under the circumstances;
- (2)The other financial institution is subject to a rule implementing 31 U.S.C. 5318(h) and is regulated by a Federal functional regulator; and
- (3)The other financial institution enters into a contract requiring it to certify annually to the covered financial institution that it has implemented its anti-money laundering program, and that it will perform (or its agent will perform) the specified requirements of the covered financial institution's procedures to comply with the requirements of this section.

BSA & Anti-Money Laundering Policy**CLOSING AN ACCOUNT**

If the bank is unable to verify the identity of the customer within 30 days, the bank will close the account according to our bank's established risk management practices and compliance requirements.

At this time, the Bank's BSA Officer will also make a determination as to whether a Suspicious Activity Report should be filed.

LACK OF VERIFICATION

In the event that the bank is unable to form an opinion concerning the customer's identity, i.e., the customer does not have documents to verify identity and we are unable to identify the customer using non-documentary methods, the bank will

- Not open the account
- The BSA Officer will determine whether the bank should file a SAR

ADDITIONAL INFORMATION REQUIRED

Our bank will make reasonable efforts to ascertain the stated purpose for each account. When opening a new personal account, new accounts personnel will

- For individual accounts:
 - Require proper identification according to the identity verification procedures.
 - Describe the documentation used including type of document; identification number in the document; place of issuance, if any; date of issuance; and expiration date.
 - Consider the reasonableness of the customer's given residence or place of business.
 - Consider the reasonableness of the source of funds used to open an account.
 - Check with the service bureau, if applicable, for undesirable situations involving the customer such as check kiting, NSF checks, etc.
 - Report to the BSA Officer any suspicious customers.
- When opening a new business account:
 - Require proper identification according to the identity verification procedures.
 - Describe the documentation used including type of document; identification number in the document, if any; place of issuance, if any; date of issuance; and expiration date, if any.
 - Require the verification of the legal status of the business (sole proprietorship, partnership, corporation, etc.).

BSA & Anti-Money Laundering Policy

- Require the verification of the name of the business with a reporting agency.
- Require proof that a foreign business is registered in the country of origin (articles of incorporation, etc.).
- Verify the business does not provide Internet Gambling services.
- Report to the BSA Officer any suspicious customers.

RECORDKEEPING

Our bank will maintain a record of all information obtained under the procedures described above. The record retention schedule is as follows.

The original, microfilm, electronic, copy, or reproduction of the following documents will be retained for five (5) years:

- All extensions of credit in excess of \$10,000 (non-real estate)
- All international transactions in excess of \$10,000 (non-real estate)
- Signature cards
- Account Statements
- All checks in excess of \$100
- Records to reconstruct demand deposit accounts
- Certificates of Deposits and records of the account holders/purchasers
- Purchase of a monetary instrument of at least \$3,000
- Taxpayer Identification number (TIN), separate from backup withholding requirements

For extensions of credit in excess of \$10,000 not secured by real estate, the records will include:

- The borrower's name and address
- The credit amount
- The purpose of credit
- The date of credit

For deposit accounts, the records will include:

- The depositor's TIN
- A list of all persons unable to secure a TIN (accounts between 1978-2003)
- Signature cards
- All checks in excess of \$100 that are drawn on or issued and payable by the Bank

For Certificates of Deposit, the records will include:

- Customer name and address
- A description of the Certificate of Deposit
- The date of deposit(s)
- A list of all persons unable to secure a TIN (accounts between 1978-2003)

For Funds Transfers or direct deposits, the records will include all deposit slips or credit tickets for transactions in excess of \$100.

BSA & Anti-Money Laundering Policy

Documentation of foreign shell bank accounts, the records will be kept for five years after the account relationship is terminated.

COMPARISON WITH GOVERNMENT LISTS

The bank will compare all customers (deposit account, loan account, investment account, trust account customers, wire transfer customers) to the current government lists such as OFAC listings and other regulatory bulletins within a reasonable time period after account opening.

CUSTOMER NOTICE

Notice of our bank's requirement to verify a customer's identity is posted in plain view in the loan and new accounts areas of the bank. A copy of our notice is attached.

RELIANCE ON ANOTHER FINANCIAL INSTITUTION

Our bank will not rely on the performance of another institution for any of our CIP procedures.

CIP PROCEDURES FOR BROKERED DEPOSITS

When brokered deposits are obtained, the bank will evaluate whether the broker's BSA/AML and OFAC policies, procedures and processes are adequate. This evaluation will be performed annually and will include review of the CIP procedures.

BSA RECOGNIZED HIGH RISK ENTITIES

Our bank understands the importance of maintaining strong due diligence and anti-money laundering programs, policies, procedures, and controls. To address the need for additional scrutiny for high-risk entities, we have incorporated account opening, and monitoring procedures into our BSA program.

Although attempts to launder money through our bank can emanate from many different sources, certain products, services, and types of entities are more vulnerable to money laundering. Our bank has assessed our products and services and has determined that the following types of services and products have the potential for money laundering by high-risk entities. These products and services include

High-Risk Business Activities

- Correspondent banking relationships
- Wire Transfers

BSA & Anti-Money Laundering Policy**High-Risk Businesses**

- Nontraditional financial entities, such as
 - Currency exchange houses, also known as giros or casas de cambio.
 - Money transmitters.
 - Check cashing facilities.
- Casinos and card clubs.
- Offshore corporations and banks located in tax and/or secrecy havens.
- Leather goods stores.
- Car, boat, and plane dealerships.
- Used automobile or truck dealers and machine parts manufacturers.
- Travel agencies.
- Brokers/dealers.
- Jewel, gem, and precious metal dealers.
- Import/export companies.
- Auctioneers.
- Deposit brokers.
- Pawn brokers.
- Professional service providers (lawyers, accountants, investment brokers).
- Cash-intensive businesses, such as convenience stores, restaurants, retail stores, and parking garages.
- Ship, bus, and plane operators.
- Telemarketers.

Other Banking Functions and Transactions

- Internet banking.
- Wire transfers/cash management functions.
- Transactions involving large amounts of traveler's checks, official bank checks, money orders, and stored value cards.
- Electronic transactions that permit the rapid movement of currency (e.g., foreign exchange transactions followed by payment into another jurisdiction).

High-Risk Countries

- Countries in which the production or transportation of illegal drugs may be taking place.
- Bank secrecy havens.
- Emerging countries that may be seeking hard currency investments.
- Countries identified in FinCEN advisories. (For a list of the advisories, see FinCEN web site www.treas.gov/fincen.)
- Major money laundering countries and jurisdictions identified in the U.S. Department of State's annual International Narcotics Control Strategy Report.

BSA & Anti-Money Laundering Policy**MONEY SERVICES BUSINESSES**

The Bank Secrecy Act specifically addresses Money Services Businesses (MSB) and the regulators have issued specific guidelines regarding their expectations for proper MSB account management. At this time, our bank does not provide services to this account type. If it is desired to provide appropriate services to this account type at a future time, while minimizing the financial, operation, and regulatory risks, the bank will comply with the act by establishing internal procedures that result in proper compliance.

ACCOUNT ESTABLISHMENT AND MAINTENANCE PROCEDURES FOR COVERED PERSONS

Our bank will use our BSA program's account opening procedures when establishing a relationship with a high-risk account (HRA). In addition, our bank will use the following procedures when establishing and maintaining a relationship with a high-risk person:

- Ascertain the Identity of the HRA account holder and the account's beneficial owner, if any.
 - In addition to using our bank's account opening procedures, our bank will require the HRA account holder to provide information to identify the client and his/her source of funds or wealth at the outset of the relationship, if applicable. Money transmitters.
 - Our bank will also undertake reasonable efforts to determine whether a legitimate reason exists for any request by an HRA account holder to associate any form of secrecy with an account, such as titling the account in the name of another person (which includes a family member, personal investment company, trust, shell corporation or other such entity.)
 - If, after making a reasonable effort to make this determination, there is substantial doubt as to whether the HRA account holder holds a beneficial interest in the account we may choose not to open the account.

QUARTERLY REVIEW

The bank, in the course of its normal account opening, maintenance or compliance procedures, when it determines that it has established a business relationship with an HRA will undertake a quarterly review (or more frequently as events dictate) of each such HRA to determine whether to continue doing that business, including consideration of pertinent account activity and documentation.

QUESTIONABLE ACTIVITIES FOR HIGH RISK ENTITIES

BSA & Anti-Money Laundering Policy

When conducting transactions for or on behalf of an HRA, our bank will be alert to features of transactions that are indicative of transactions that may involve money laundering, suspicious activity, or terrorism. Our employees will be trained to recognize and watch for these types of transactions for all HRA accounts.

The following non-exhaustive list of potentially questionable or suspicious activities is designed to illustrate the sort of transactions involving HRAs that often will warrant enhanced scrutiny, but does not replace, supersede or supplant our bank's legal obligations regarding potentially suspicious transactions generally.

These questionable actions include:

- A request by an HRA to establish a relationship with, or route a transaction through, a financial institution that is unaccustomed to doing business with foreign persons and that has not sought out business of that type;
- A request by an HRA to associate any form of secrecy with a transaction, such as booking the transaction in the name of another person or a business entity whose beneficial owner is not disclosed or readily apparent;
- The routing of transactions involving an HRA into or through a secrecy jurisdiction or through jurisdictions or financial institutions that have inadequate customer identification practices and/or allow third parties to carry out transactions on behalf of others without identifying themselves to the institution;
- The routing of transactions involving an HRA through several jurisdictions and/or financial institutions prior to or following entry into an institution in the United States without any apparent purpose other than to disguise the nature, source, ownership or control of the funds;
- The use by an HRA of accounts at a nation's central bank or other government-owned bank, or of government accounts, as the source of funds in a transaction;
- The rapid increase or decrease in the funds or asset value in an account of an HRA that is not attributable to normal business fluctuations;
- Frequent or excessive use of funds transfers or wire transfers either in or out of an account of an HRA;
- Wire transfers to or for the benefit of an HRA where the beneficial owner or originator information is not provided with the wire transfer, when inclusion of such information would be expected;

BSA & Anti-Money Laundering Policy

- Large currency or bearer instrument transactions either in or out of an account of an HRA;
- The deposit or withdrawal from an HRA account of multiple monetary instruments just below the reporting threshold on or around the same day, particularly if the instruments are sequentially numbered;
- High-value deposits or withdrawals, particularly irregular ones, not commensurate with the type of account or what is known and documented regarding the legitimate wealth or business of the HRA;
- A pattern that after a deposit or wire transfer is received by an HRA, the funds are shortly thereafter wired in the same amount to another financial institution, especially if the transfer is to an account at an offshore financial institution or one in a "secrecy jurisdiction;"
- The frequent minimal balance or zeroing out of an account of an HRA for purposes other than maximizing the value of the funds held in the account (e.g., by placing the funds in an overnight investment and having the funds then return to the account); and
- An inquiry by or on behalf of an HRA regarding exceptions to the reporting requirements of the Bank Secrecy Act (e.g., Currency Transaction Reports and Suspicious Activity Reports) or other rules requiring the reporting of suspicious transactions.

MONITORING

Our bank realizes the risks associated with exposure from high-risk entities. We will perform regular ongoing monitoring of these types of account in accordance with our internal controls and Bank Secrecy Act laws and regulations.

ACH TRANSACTIONS

Daily, a report is generated for IAT transactions. The report will advise the bank if the OFAC check was not done at either the Gateway Operator or the Secondary Operator. The report will list each IAT transaction and all of the addenda information. The transaction(s) will reject, requiring the bank to complete an OFAC review before it posts to the customer's account. The bank will complete the OFAC review and record if the item was or was not a blocked party.

WIRE TRANSFERS

Certain types of information on wire transfers is required to be recorded, retained, and transmitted depending upon our bank's role in a particular wire transfer, the amount of the wire transfer, and the relationship of the parties to the transfer with our bank.

Originating Bank

BSA & Anti-Money Laundering Policy

If our bank receives an order to originate a wire transfer in an amount of \$3,000 or more, we will record and retain the following information:

- The name and address of the originator
- The amount of the funds transfer
- The account number of the originator
- The execution date of the payment order
- Any payment instructions received from the originator
- The identity of the beneficiary's bank
- As many of the following items as are received with the payment order:
 - The name and address of the beneficiary
 - The account number of the beneficiary
 - Any other specific identifier of the beneficiary

Current bank policy prohibits the sale of wire transfers to persons who are not accountholders.

Intermediary Bank

If our bank acts as an intermediary bank that accepts a payment order in an amount of \$3,000 or more, we will retain either the original or a microfilm of the original, another copy, or an electronic record of the payment order.

Beneficiary's Bank

If our bank receives a wire transfer payment order in an amount of \$3,000 or more, it will retain either the original or a microfilm of the original, another copy, or an electronic record of the payment order. If the beneficiary is not an established customer, we will also

- Verify the identity of the person receiving the proceeds if they are delivered in person and record and retain the following:
 - The name and address of the person receiving the proceeds
 - The type of identification reviewed
 - The number of the identification document (e.g., a driver's license)
 - The person's taxpayer identification number or, if none, the person's alien identification number or passport number and country of issuance, or a notation of the lack of such a number
 - The beneficiary's (if different from the person receiving the funds and the bank has knowledge that the person receiving payment is not the beneficiary) taxpayer identification number or, if none, the person's alien identification number or passport number and country of issuance, if known by the person placing the order, or a notation of the lack of such a number
- Record and retain the following if the proceeds are delivered other than in person:

BSA & Anti-Money Laundering Policy

- A copy of the check or other instrument used to effect payment, or the information contained in the method of payment
- The name and address of the person to whom the payment was sent

Generally, our bank does not receive wires for non-customers.

Record Keeping Exemptions

Exemptions from the above record keeping requirements for wire transfers include funds transfers (a) where both the originator and beneficiary are the same person and the originator's bank and the beneficiary's bank are the same domestic bank, and (b) where both the originator and beneficiary are any of the following:

- A domestic bank
- A wholly-owned domestic subsidiary of a domestic bank
- A domestic broker or dealer in securities
- A wholly-owned domestic subsidiary of a domestic broker or dealer in securities
- The United States
- A state or local government
- A federal state or local government agency or instrumentality

RECORD RETENTION

All the above information that is required to be recorded, reported, or transmitted will be retained for a period of five years.

REVIEW OF POLICY

The Board of Directors shall review this policy and related risk assessments at least annually, making such revisions and amendments as it deems appropriate.

**ADDENDUM TO BSA AND ANTI-MONEY LAUNDERING POLICY –
USA PATRIOT ACT****INFORMATION SHARING WITH THE GOVERNMENT – Section 314(a) of the USA
PATRIOT Act****DEFINITIONS**

Money Laundering — An activity criminalized by 18 USC 1956 or 18 USC 1957.

Terrorist Activity — An act of domestic terrorism or international terrorism as those terms are defined in 18 USC 2331.

BSA & Anti-Money Laundering Policy

Account — A formal banking or business relationship established to provide regular services, dealings, and other financial transactions, and includes, but is not limited to, a demand deposit, savings deposit, or other transaction or asset account and a credit account or other extension of credit.

Transaction — The same meaning as provided in section 1010.100 (Bank Secrecy Act), except that for purposes of section 1010.520 a transaction does not mean any transaction conducted through an account.

DESIGNATION OF POINT OF CONTACT

Upon receiving an information request under this section, our bank will designate the Bank Secrecy Officer to be the point of contact at the institution regarding the request and to receive similar requests for information from FinCEN in the future. FinCEN will produce a list every two weeks and the Bank must review its database within 14 days of receiving the 314(a) list from FinCEN. When requested by FinCEN, our bank will provide FinCEN with

- Name
- Title
- Mailing address
- E-mail address
- Telephone number
- Facsimile number

This information will be provided to FinCEN in the format requested by FinCEN. If we change the contact information in any manner, our bank will promptly notify FinCEN of any changes to such information.

INFORMATION REQUESTS BASED ON CREDIBLE EVIDENCE CONCERNING TERRORIST ACTIVITY OR MONEY LAUNDERING

A federal law enforcement agency investigating terrorist activity or money laundering may request that FinCEN solicit, on the investigating agency's behalf, certain information from our bank. After FinCEN's approval, the request for information is forwarded to our bank.

Once our bank has received the request from FinCEN under this section, the Bank Secrecy Officer will begin a confidential investigation. Our Bank Secrecy Officer may contact the federal law enforcement agency named in the information request with any questions relating to the scope or terms of the request. Except as otherwise provided in the information request, our bank will only be required to search its records for

- Any current account maintained for a named suspect;
- Any account maintained for a named suspect during the preceding twelve months; and

BSA & Anti-Money Laundering Policy

- Any transaction, as defined by section 103.90 (see definitions for this section), conducted by or on behalf of a named suspect, or any transmittal of funds conducted in which a named suspect was either the transmitter or the recipient, during the preceding six months that is required under law or regulation to be recorded by the financial institution or is recorded and maintained electronically by the institution.

If our bank identifies an account or transaction identified with any individual, entity, or organization named in a request from FinCEN, we will report to FinCEN in the period specified in FinCEN's request, the following information:

- The name of such individual, entity, or organization;
- The number of each such account, or in the case of a transaction, the date and type of each such transaction; and
- Any Social Security number, taxpayer identification number, passport number, date of birth, address, or other similar identifying information provided by the individual, entity, or organization when each such account was opened or each such transaction was conducted.

USE AND SECURITY

Our bank will take every precaution to secure the use of the information request. Our bank will take all of the same precautions used to safeguard customer information as described in our policy and procedures according to section 501 (Protection of Nonpublic Personal Information) of the Gramm-Leach-Bliley Act (15 USC 6801) and Bank Secrecy procedures. Our bank will not use information provided by FinCEN pursuant to this section for any purpose other than

- Reporting to FinCEN as provided in this section;
- Determining whether to establish or maintain an account, or to engage in a transaction; or
- Assisting the financial institution in complying with any requirement of this part.

Our bank will not disclose to any person, other than FinCEN or the federal law enforcement agency on whose behalf FinCEN is requesting information, the fact that FinCEN has requested or has obtained information under this section (except to the extent necessary to comply with such an information request).

Our bank being authorized to share information under section, may share information concerning an individual, entity, or organization named in a request from FinCEN in accordance with the requirements of such section. However, such sharing shall not disclose the fact that FinCEN has requested information concerning such individual, entity, or organization.

The Bank will not retain a copy of the 314(a) lists. However, a log will be maintained listing the control numbers of the lists reviewed.

VOLUNTARY INFORMATION SHARING AMONG FINANCIAL INSTITUTIONS

BSA & Anti-Money Laundering Policy

Subject to the provisions under Notice requirement, Verification requirement, and Use and security of information (below), our bank may, under the protection of the safe harbor from liability described below, transmit, receive, or otherwise share information with any other financial institution or association of financial institutions regarding individuals, entities, organizations, and countries for purposes of identifying and, where appropriate, reporting activities that the financial institution or association suspects may involve possible terrorist activity or money laundering. This safe harbor applies only if our bank meets the notice requirements and security and confidentiality requirements of this section.

NOTICE REQUIREMENT

Before our bank shares information, the Bank Secrecy Officer will register with FinCEN for 314(b) information sharing between financial institutions. The registration will be effective for the one-year period beginning on the date of the notice by completing the online form on FinCEN's Web site, www.fincen.gov, and entering the appropriate information as directed.

In order to continue to engage in the sharing of information after the end of the one-year period, the Bank Secrecy Officer will submit a new notice.

Prior to sharing information, our bank will take reasonable steps to verify that the other financial institution or association of financial institutions with which our bank intends to share information has submitted to FinCEN the notice required. Our bank will satisfy this requirement by confirming that the other financial institution or association of financial institutions appears on a list that FinCEN will periodically make available, or by confirming directly with the other financial institution or association of financial institutions that the requisite notice has been filed.

INFORMATION SHARING BETWEEN FINANCIAL INSTITUTIONS AND THE FEDERAL GOVERNMENT

If, as a result of information shared, our bank knows, suspects, or has reason to suspect that an individual, entity, or organization is involved in, or may be involved in terrorist activity or money laundering, the Bank Secrecy Officer will file a Suspicious Activity Report. In situations involving violations requiring immediate attention, such as when a reportable violation involves terrorist activity or is ongoing, our bank will notify immediately, by telephone, an appropriate law enforcement authority and financial institution supervisory authorities in addition to the timely filing of a Suspicious Activity Report.

ADDENDUM TO BANK SECRECY ACT POLICY – USA PATRIOT ACT**CORRESPONDENT ACCOUNTS**

BSA & Anti-Money Laundering Policy

Under the act, banks may not open or maintain correspondent accounts for foreign banks that have no physical location. To assure that this institution complies with this prohibition, our bank will not open this type of account.

BENEFICIAL OWNERSHIP REQUIREMENTS FOR LEGAL ENTITY CUSTOMERS

APPENDIX A CERTIFICATION REGARDING BENEFICIAL OWNERS OF LEGAL ENTITY CUSTOMERS

I. GENERAL INSTRUCTIONS**What is this form?**

To help the government fight financial crime, Federal regulation requires certain financial institutions to obtain, verify, and record information about the beneficial owners of legal entity customers. Legal entities can be abused to disguise involvement in terrorist financing, money laundering, tax evasion, corruption, fraud, and other financial crimes.

Requiring the disclosure of key individuals who own or control a legal entity (i.e., the beneficial owners) helps law enforcement investigate and prosecute these crimes.

Who has to complete this form?

This form must be completed by the person opening a new account on behalf of a legal entity with any of the following U.S. financial institutions: (i) a bank or credit union; (ii) a broker or dealer in securities; (iii) a mutual fund; (iv) a futures commission merchant; or (v) an introducing broker in commodities.

For the purposes of this form, a legal entity includes a corporation, limited liability company, or other entity that is created by a filing of a public document with a Secretary of State or similar office, a general partnership, and any similar business entity formed in the United States or a foreign country. Legal entity does not include sole proprietorships, unincorporated associations, or natural persons opening accounts on their own behalf.

What information do I have to provide?

This form requires you to provide the name, address, date of birth and Social Security number (or passport number or other similar information, in the case of Non-U.S. Persons) for the following individuals (i.e., the beneficial owners):

- (i) Each individual, if any, who owns, directly or indirectly, 25 percent or more of the equity interests of the legal entity customer (e.g., each natural person that owns 25 percent or more of the shares of a corporation); **and**
- (ii) An individual with significant responsibility for managing the legal entity customer (e.g., a Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Managing Member, General Partner, President, Vice President, or Treasurer).

BSA & Anti-Money Laundering Policy

The number of individuals that satisfy this definition of “beneficial owner” may vary. Under section (i), depending on the factual circumstances, up to four individuals (but as few as zero) may need to be identified. Regardless of the number of individuals identified under section (i), you must provide the identifying information of one individual under section (ii). It is possible that in some circumstances the same individual might be identified under both sections (e.g., the President of Acme, Inc. who also holds a 30% equity interest). Thus, a completed form will contain the identifying information of at least one individual (under section (ii)), and up to five individuals (i.e., one individual under section (ii) and four 25 percent equity holders under section (i)).

The financial institution may also ask to see a copy of a driver’s license or other identifying document for each beneficial owner listed on this form.

BSA & Anti-Money Laundering Policy

II. CERTIFICATION OF BENEFICIAL OWNER(S)

Persons opening an account on behalf of a legal entity must provide the following information:

a. Name and Title of Natural Person Opening Account:

b. Name, Type, and Address of Legal Entity for Which the Account is Being Opened:

c. The following information for each individual, if any, who, directly or indirectly, through any contract, arrangement, understanding, relationship or otherwise, owns 25 percent or more of the equity interests of the legal entity listed above

Name	Date of Birth	Address (Residential or Business Street Address)	For U.S. Persons: Social Security Number	For Non-U.S. Persons: Social Security Number, Passport Number and Country of Issuance, or other similar identification number ¹

(If no individual meets this definition, please write "Not Applicable.")

d. The following information for one individual with significant responsibility for managing the legal entity listed above, such as:

- ☐ *An executive officer or senior manager (e.g., Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Managing Member, General Partner, President, Vice President, Treasurer); or*

- ☐ *Any other individual who regularly performs similar functions.*

(If appropriate, an individual listed under section (c) above may also be listed in this section (d)).

Name/Title	Date of Birth	Address (Residential or Business Street Address)	For U.S. Persons: Social Security Number	For Non-U.S. Persons: Social Security Number, Passport Number and Country of Issuance, or other similar identification number ¹

I, _____ (name of natural person opening account), hereby certify, to the best of my knowledge, that the information provided above is complete and correct.

Signature: _____ Date: _____

Legal Entity Identifier _____ (Optional)

BSA & Anti-Money Laundering Policy

¹ In lieu of a passport number, Non-U.S. Persons may also provide a Social Security Number, an alien identification card number, or number and country of issuance of any other government-issued document evidencing nationality or residence and bearing a photograph or similar safeguard.