

AML Policies and Procedures Employee Acknowledgement

Money laundering is generally defined as engaging in acts designed to conceal or disguise the true origins of criminally derived proceeds so that the unlawful proceeds appear to have derived from legitimate origins or constitute legitimate assets. It is our policy to prohibit and actively prevent money laundering and any activity that facilitates money laundering or the funding of terrorist or criminal activities.

You are responsible for knowing and following all company policies and procedures. You should be:

- Familiar with the company's Anti-Money Laundering and OFAC Policy
- Familiar with their business unit/department's anti-money laundering and OFAC procedures, including:
 - 1. Knowing all customer identification and verification procedures for opening new accounts and servicing existing accounts.
 - 2. Identifying red flag activities pertinent to their business unit or area.
 - 3. Reporting red flag activities or other suspicious activities to your supervisor or as directed in the anti-money laundering procedures for their business unit; and
 - 4. Keeping strictly confidential red flag reports and not revealing any aspect of a report to the customer or to any employees who are not directly responsible for compliance.