



First National Bank of Pennsylvania | BSA/AML/OFAC Program Certification

The primary federal regulator of First National Bank of Pennsylvania (“FNB” or “the Bank”), a national bank organized and existing under the laws of the United States of America, is the Office of the Comptroller of the Currency (OCC).

FNB certifies it maintains a robust Anti-Money Laundering (AML), Countering the Finance of Terrorism (CFT), and Sanctions Policy and Program designed to, at a minimum, ensure FNB is in compliance with all applicable laws, rules, and regulations, including the Bank Secrecy Act (“BSA”), and sanctions administered by the United States Department of the Treasury’s Office of Foreign Assets Control (“OFAC”).

FNB acknowledges it has verified the identity of all customers (and third parties involved as applicable) as required under the Customer Identification Program (CIP) provisions of the USA PATRIOT Act. The Bank complies with all CIP requirements, including those pertaining to recordkeeping, providing adequate customer notice, and determining whether a customer appears on a designated list of known or suspected terrorists or terrorist organizations. The Bank further acknowledges it identifies and verifies Beneficial Owners and Control Persons as applicable under FinCEN’s Customer Due Diligence/Beneficial Ownership Rule.

Among other relevant laws, the AML Policy adheres to regulations implementing the USA PATRIOT Act, which prohibit accounts with foreign shell banks; require financial institutions to establish due diligence policies, procedures, and controls reasonably designed to detect and report money laundering through correspondent accounts; and mandate financial institutions to conduct enhanced scrutiny of certain accounts maintained by or on behalf of senior foreign political figures.

FNB’s AML Program further requires each FNB affiliate to maintain an AML/CFT and sanctions program which provides for:

- Procedures to implement the Know Your Customer (“KYC”) policy/program and Customer Identification Program, including beneficial ownership of legal entities, and 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;
- Procedures and other controls to prevent transactions that violate sanctions prohibitions, including regulations and sanctions programs administered by OFAC;
- The designation of an Anti-Money Laundering Compliance Officer, or other appropriate personnel, responsible for coordinating and monitoring day-to-day compliance with the AML Policy and applicable laws, rules and regulations;
- Recordkeeping and reporting practices in accordance with the AML Policy and applicable laws, rules and regulations;
- Appropriate methods of monitoring transactions and account relationships to identify potential suspicious activity;
- Reporting of suspicious activity to governmental authorities in accordance with the AML Policy and applicable laws, rules and regulations;

- Training of appropriate personnel with regard to anti-money laundering, anti-terrorist financing, and sanctions issues and their responsibilities for compliance;
- Independent testing to ensure that the programs required by the AML Policy and applicable laws, rules and regulations have been implemented and continue to be appropriately maintained.

FNB is committed to maintaining industry-leading standards in complying with economic and financial sanctions governed by the United States Department of the Treasury's Office of Foreign Assets Control. The AML Program's risk-based policies adhere to applicable legal and regulatory obligations ensuring FNB and its customers do not engage in prohibited activities or jurisdictions.

This certification is accurate as of 12/14/2023 and will be in effect through 11/30/2024.

Theodore Zelch 12/14/2023

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Director of Money Laundering and Sanctions Risk Management