

City National Bank (CNB) AML Compliance Program

December 5, 2024

To Whom It May Concern:

City National Bank (CNB) is a subsidiary of Royal Bank of Canada, one of the world's largest banks. CNB is committed to maintaining an effective Anti-Money Laundering (AML) Program designed to deter, detect and report suspicious activity, including the misuse of its products, services and delivery channels related to money laundering or terrorist financing, bribery, corruption, or other activities may violate applicable economic sanctions (ES) (collectively Financial Crimes Compliance Program). A Bank Secrecy Act (BSA) AML Officer is appointed to oversee the design, content and implementation of CNB's Financial Crimes Compliance Program.

CNB's Financial Crimes Compliance Program defines the roles and responsibilities of colleagues in managing risk and ensuring relevant policies and procedures comply with applicable AML and ES laws and regulations including the BSA, the Money Laundering Control Act, the USA PATRIOT Act, and ES programs administered by the Office of Foreign Assets Control (OFAC). CNB's policies, procedures, and system of internal controls includes but are not limited to:

- Risk Assessments to identify potential financial crimes risks
- A Client Identification Program, Client Due Diligence including the identification and verification of beneficial owners of certain entity clients
- Monitoring of transactions to identify suspicious activity
- Reporting of suspicious activity
- Independent Testing of the Financial Crimes Compliance Program
- Recordkeeping and retention

CNB's policies and procedures are designed to adhere to applicable AML and ES laws and regulations by regularly evaluating the effectiveness of its Financial Crimes Compliance Program.

Sincerely,

Austin Hong, Senior Vice President

BSA and OFAC Officer

CNB Financial Crimes Compliance