

ZIONS BANCORPORATION

May 29, 2024

To Whom It May Concern,

Effective January 1, 2016, the affiliated banks under Zions Bancorporation consolidated under a single bank charter as ZB, N.A., a nationally chartered bank. Subsequently, on October 1, 2018, Zions Bancorporation and ZB, N.A. also consolidated under a single bank charter as Zions Bancorporation, N.A., a nationally chartered Bank. These changes affected the following: Zions First National Bank, Amegy Bank N.A., California Bank & Trust, National Bank of Arizona, Nevada State Bank, Vectra Bank Colorado, and The Commerce Bank of Washington (Note: The Commerce Bank of Oregon merged into The Commerce Bank of Washington in 2015.). Each bank continues to operate locally under their name as a division of Zions Bancorporation, N.A. This letter and the attached Wolfsberg Questionnaire apply to all divisions of Zions Bancorporation, N.A.

The Board of Directors for Zions Bancorporation, N.A. has approved an Anti-Money Laundering Program addressing the Bank's commitment to conducting business and operations in accordance with the highest ethical standards and in full conformity with all domestic laws and regulations relating to anti-money laundering, anti-terrorism and "Know Your Customer" principles. The Senior Vice President and Director of BSA Compliance for Zions Bancorporation, N.A. has the responsibility to direct, manage, coordinate, monitor and report bank-wide compliance with the provisions of the Bank Secrecy Act (BSA)/Anti-Money Laundering (AML) and Anti-Terrorism Legislation. As part of this program, ongoing BSA/AML training will be provided to appropriate employees.

Our policies and procedures comply with the Financial Record Keeping and Currency and Foreign Transaction Reporting Act (also known as the Bank Secrecy Act), the Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act of 2001 (USA PATRIOT Act), the Office of Foreign Asset and Control (OFAC), and the implementing regulations of the institution's primary regulator, the Office of the Comptroller of the Currency (OCC). The OCC regulations dictate when a National Bank shall report suspicious activity.

Zions Bancorporation, N.A. has written policies and procedures to ensure that reasonable measures are taken to obtain information about the true identity of customers so as to ensure legitimate activities, including ensuring that the institution does not knowingly transact business with sanctioned individuals, entities, and/or countries identified by the appropriate government agencies, law enforcement and regulators. Zions Bancorporation, N.A. does not provide banking services for banks that do not have a physical presence in any country (i.e. Shell Banks).

Sincerely,



Theresa Baker-Smith
Theresa.Baker-Smith@zionsbancorp.com
Senior Vice President & Director of BSA Compliance
Zions Bancorporation, N.A.