

FIRST CITIZENS ANTI-MONEY LAUNDERING PROGRAM CERTIFICATION

The purpose of this Certification is to provide a brief statement of First Citizens' program for compliance with applicable federal regulations governing anti-money laundering and anti-terrorist financing (collectively "AML"). This statement is intended for use by financial institutions that may process transactions through First Citizens and that require a certification in connection with their compliance programs. This document may be changed from time to time without notice and will be published on our website at firstcitizens.com. Financial institutions using this document should check our website periodically for updated information.

It is the policy of First Citizens Bancshares and its subsidiaries (collectively "First Citizens") to comply with all applicable AML laws and regulations including, but not limited to, the Bank Secrecy Act ("BSA"), the Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism ("Patriot Act"), and the Office of Foreign Asset Control ("OFAC") regulations. First Citizens' compliance program consists of the following key components:

- *Executive Management Role* – Executive management is committed to AML compliance and takes a leadership role in emphasizing its importance throughout the organization.
- *BSA Officer* – A designated BSA Officer is responsible for establishing and directing corporate AML compliance processes and strategies and reporting to executive management on compliance efforts.
- *AML Policies and Procedures* – We have adopted corporate policies and procedures for the detection and appropriate reporting of money laundering and terrorist financing, including procedures for large currency transaction reporting, OFAC monitoring, customer identification verification, account monitoring, training and program assessment.
- *AML Education* – AML compliance and awareness of AML requirements are promoted throughout First Citizens by education, training, and communications.
- *AML Program Evaluations* – Our Internal Audit Department routinely audits and tests our AML program to evaluate the effectiveness of our policies and procedures.
- *Bankwide Involvement* - Associates throughout our organization are involved in implementing our compliance program, including the AML Compliance Department, Risk Management Department, senior and mid-level management, and associates in the field.
- *Centralized Investigations and Reporting* – A centralized unit investigates AML activity and manages reporting of suspicious activity.

Additional information on First Citizens, our management, products, services and locations is available at firstcitizens.com. For any questions regarding this document, please contact Michael LaVacca, GVP, Chief Compliance Officer, via email at Mike.LaVacca@firstcitizens.com or Mariela Cabaleiro, SVP, AML Compliance Manager, via email at Mariela.Cabaleiro@firstcitizens.com.



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Chief Compliance Officer
First Citizens Bancshares, Inc and all of its subsidiaries