



F.N.B. Corporation | BSA/AML/OFAC Program Certification

F.N.B. Corporation and its affiliates (collectively, “FNB”) certifies it maintains a robust Anti-Money Laundering (AML), Countering the Financing of Terrorism (CFT), and Sanctions Policy and Program designed to, at a minimum, ensure FNB are in compliance with all applicable laws, rules, and regulations, including the Bank Secrecy Act (“BSA”), and sanctions administered by the Office of Foreign Assets Control (“OFAC”). The primary federal regulator of First National Bank of Pennsylvania (the “Bank”), a wholly-owned subsidiary of F.N.B. Corporation, is the Office of the Comptroller of the Currency (OCC).

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 that 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 Policy 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 has undertaken due diligence to know its customers. To the best of FNB's knowledge, FNB's customers are not prohibited shell banks, an individual or entity that is named on the list of Specially Designated Nationals and Blocked Persons issued by the Department of the Treasury's Office of Foreign Assets Control ("OFAC"), or an entity that is organized or chartered in a country or territory subject to OFAC's country-wide or territory-wide sanctions programs, to the extent prohibited by applicable sanctions, or named on any available government lists of known or suspected terrorists or terrorist organizations issued by the government of any jurisdiction in which FNB conducts business, as applicable, in violation of applicable law.

This certification is accurate as of 01/01/2025 and will be in effect through 12/31/2025.

Theodore L Zelch 3/27/25

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Managing Director of Money Laundering and Sanctions Risk Management