

January 2, 2020

To Whom It May Concern:

Bank of America Corporation is a bank holding company headquartered in Charlotte, North Carolina, United States of America. Bank of America Corporation is publicly owned and listed on the New York Stock Exchange (symbol: BAC). Bank of America Corporation and its subsidiaries (collectively “Bank of America”) make every effort to remain in compliance with applicable Anti-Money Laundering laws, rules and guidance in the jurisdictions in which it does business. Bank of America Corporation is regulated by the U.S. Federal Reserve Bank of Richmond. Its subsidiaries in the United States are regulated by several regulatory agencies including the Office of the Comptroller of the Currency; the Federal Deposit Insurance Corporation; the Securities and Exchange Commission; the Commodity Futures Trading Commission; and, the Financial Industry Regulatory Authority. Outside the United States, Bank of America Corporation’s subsidiaries are subject to local regulatory oversight.

As required by U.S. law, Bank of America has designated me as the Chief Financial Crimes Compliance Executive. I lead an experienced team of employees to oversee Bank of America’s execution of its risk-based Anti-Money Laundering program. Bank of America has developed and implemented a risk-based Anti-Money Laundering program comprising written Anti-Money Laundering policies, procedures, internal controls and systems, which include but are not limited to the following:

- A customer identification program and procedures that include the identification and verification of the identity of beneficial owners of certain entity customers;
- Procedures, processes and systems to collect and refresh customer due diligence information; processes to assess risk at both the program and customer level;
- Procedures, processes and systems to monitor customer transactions and activity;
- Procedures, processes and systems to identify and report suspicious activity; and,

- Procedures, processes and systems to produce other required reports and keep required records.

Bank of America educates appropriate employees and related third parties in applicable aspects of Anti-Money Laundering laws, rules and regulations, as well as the Company's processes and methodologies to mitigate the risk of money laundering. The Bank of America Anti-Money Laundering program is subject to independent testing pursuant to a program administered by its Audit Department. Bank of America cooperates fully with law enforcement and regulatory investigations and inquiries. Bank of America does not do business with "shell banks."

Sincerely,

William J. Fox, Managing Director  
Global Financial Crimes Compliance Executive