A SUMMARY OF HAMILTON RESERVE BANK'S BSA/AML/CFT/CPF/OFAC COMPLIANCE POLICIES

OVERVIEW

The award-winning Hamilton Reserve Bank ("HRB" or the "Bank") is a duly licensed and fully regulated global bank serving a large and rapidly expanding clientele from more than 150 countries in 126 currencies and 15 languages. HRB has worldwide relationships, extensive correspondent banking channels, and a global staff from 14 countries speaking a total of 15 languages. The Bank is currently in full compliance with BSA / AML / CFT / CPF / OFAC mandates in all respects.

Hamilton Reserve Bank Has Maintained a Pristine Regulatory Compliance History Since Inception: Hamilton Reserve Bank has a spotless regulatory compliance record with full BSA, AML, and OFAC compliance, independently audited annually, made possible through multi-million-dollar investments in advanced Temenos Swiss fintech and AI under the vigilant leadership of a seasoned U.S. and U.K. management team. Temenos, the world's largest core banking technology firm has featured Hamilton Reserve Bank as a global success story. As a large bank, HRB recognizes its obligations to cooperate with and support regulators and law enforcement agencies around the world in their legitimate efforts to detect and prevent financial crimes, and to fully comply with BSA/AML/CFT/OFAC regulations. The Bank is subject to laws and regulations of banking and securities regulators that have supervisory authority over the Bank or its affiliates where the Bank operates.

Our Physical Location, Global Headquarters: The Bank's global headquarters is a large 12-acre bank campus located in Nevis, Saint Kitts & Nevis solely dedicated to Hamilton Reserve Bank and its staff. The Bank's physical address is Hamilton Reserve Bank Plaza, Nevis, Saint Kitts and Nevis. (Tel: +1 869 4698889).

Guided by A Comprehensive Compliance Manual: The Bank operates under a formal and updated BSA/AML/CFT/CPF Compliance Manual ("Manual") which seeks to ensure that HRB implements and adheres to the highest and updated compliance standards by establishing and effecting policies, processes and controls reasonably designed to deter and report AML violations and terrorist financing under internationally applicable reporting requirements.

Our Updated Wolfsberg Group Questionnaire: The Bank also operates within the context of principles and industry standards to combat money laundering and terrorist financing developed by The Wolfsberg Group, an association of global banks that aims to develop prudent frameworks and guidance for the management of financial crime risks. HRB regularly updates its Wolfsberg Group Questionnaire and implements the latest compliance requirements.

Our Annual Independent BSA/AML Compliance Audit: In addition to annual independent financial audits, the Bank engages an independent, reputable, and qualified third-party firm to conduct an independent compliance audit of its BSA/AML/CFT/CPF compliance with HRB's policies, including but not limited to anti-money laundering programs, customer due diligence procedures and suspicious transactions reporting procedures. The independent compliance audit assists in the identification of institution-specific money laundering (AML) risks, Combating the Financing of Terrorism (CFT) risks, and Countering the Financing of Proliferation (CFP) risks, and includes testing to determine the effectiveness of the Bank's programs, related procedures, and internal controls.

Our Procedures on Reporting Suspicious Activities, Filing SARs: Our approach to these matters is entirely in accord with the specific processes directed by our banking regulators, whose clear directives as the following are also prominently displayed on their websites: https://www.nevisfsrc.com/

Here, in every instance where HRB has prima facie evidence of unlawful funds or illicit transactions, HRB has followed the exact steps guided by AML laws and standard banking industry practices:

- Freeze the funds immediately; and
- Notify the Financial Intelligence Unit (FIU) and report to banking regulators; and
- Close the suspicious accounts; and
- File Suspicious Transaction Reports (SARs or STRs); and
- Set aside the suspicious funds in a third-party escrow account or as directed by regulators or law enforcement; and
- Fully cooperate with government investigations

Powered by Advanced Temenos Banking Technology: The Bank's financial technology is provided by Temenos, which is the world's largest core banking technology firm that runs 80% of the world's largest banks. HRB adopts risk-based Straight-Through Processing (STP) and uses government-grade, sophisticated facial recognition technology for identity verification as well as real time transaction monitoring.

Managed By a Highly Skilled Risk and Compliance Team: The Bank's risk and compliance duties are discharged daily by a team of experienced risk and compliance professionals under the supervision of the Bank's Board of Directors as well as the various governing roles established by the Board:

- Board of Directors
- Office of the Chief Compliance Officer
- Office of the Chief Risk Officer
- Office of the General Counsel

A SUMMARY OF HAMILTON RESERVE BANK'S
GLOBAL ANTI-MONEY LAUNDERING COMPLIANCE PROGRAM

The Bank has implemented a risk-based global Anti-Money Laundering ("AML") Compliance Program ("AML Program") designed to comply with AML laws and regulations in the U.S. and other jurisdictions, including the Bank Secrecy Act, as amended by the USA PATRIOT Act of 2001, the Anti-Money Laundering Act of 2020, and other applicable laws and regulations from around the world relating to the prevention of money laundering and terrorist financing in the jurisdictions where the Bank operates. Our AML Program consists of, among other things:

• Designations of a Global Head of Financial Crimes Compliance and sector, regional, and legal entity AML Compliance Officers who are responsible for coordinating and monitoring day-to-day compliance with the AML Program for their businesses and regions, respectively.
• AML risk assessments at the program, customer, and product and services levels.
• Written policies, procedures, and a system of internal controls designed to facilitate ongoing compliance with applicable AML laws and regulations.
• Know Your Customer (KYC) standards including a Customer Identification Program and robust Customer Due Diligence procedures reasonably designed to identify and verify all customers and, where applicable, beneficial owners, source of funds, source of wealth, and the nature and intended purpose of the business relationship, to the extent warranted by the risk of money laundering or terrorist financing or as required by regulation.

• Performance of additional due diligence on higher risk customers including politically exposed persons.
• Risk-based measures and systems for ongoing monitoring of transactions and activities through customers' accounts.
• Identification and reporting of suspicious transactions or activities to the appropriate regulatory authorities in accordance with applicable laws.
• AML training for appropriate personnel.
• Independent audit and compliance testing functions to review and assess the Bank for compliance with the AML Program and applicable laws.
• Prohibition from conducting business with shell banks; and
• Record keeping and reporting requirements, including those for banking transactions and records obtained pursuant to the Customer Identification Program.

The Bank has implemented policies and procedures designed to comply with the prohibitions and restrictions mandated by OFAC and all other laws and regulations applicable in the jurisdictions where the Bank operates. The Bank has also implemented policies and proportionate, reasonable prevention procedures against facilitation of tax evasion, including the requirements to conduct periodic risk assessments, to undertake product due diligence and training, and to implement escalation procedures.

A SUMMARY OF OUR GLOBAL SANCTIONS COMPLIANCE

Hamilton Reserve Bank has established a Global Sanctions Compliance Program ("GSC Program") consisting of the following elements: (i) procedures, systems, and internal controls designed to comply with applicable sanctions; (ii) designated bank officers responsible for the day-to-day implementation and operation of the GSC Program; (iii) independent testing; (iv) an ongoing training program; and (v) reporting and record keeping. The GSC Program is headed by the Bank's Chief Compliance Officer and Chief Risk Officer. The Bank, its employees, and contingent workers ("Employees"), wherever located, must comply with sanctions legally applicable to them in the jurisdictions in which they are located or do business.

HRB and its Employees may also be subject to additional prohibitions based on the non-U.S. sanctions in effect in the jurisdictions in which they are located. HRB and its employees are prohibited from engaging in transactions involving Specially Designated Nationals ("SDNs") and other activities such as:

• Opening or maintaining accounts for SDNs or any other person subject to prohibitions of laws and regulations.
• Conducting transactions either directly or indirectly with SDNs or any other person, entity or country prohibited by laws and regulations.
• Facilitating any prohibited transaction by advising on ways to avoid compliance.
• Facilitating non-U.S. person to engage in transactions prohibited by U.S. laws.

To prevent dealings with sanctioned parties, HRB performs real time screening of customer relationships and transactions against the SDN list or other legally applicable sanctions lists, including those published or administered by the European Union and Treasury of the United Kingdom. HRB has adopted policies and procedures governing the maintenance of its screening systems and processes.

A SUMMARY OF ECONOMIC SANCTIONS

Hamilton Reserve Bank ("HRB") must comply with the sanctions administered and enforced by the Office of Foreign Assets Control of the U.S. Department of the Treasury ("OFAC") (http://www.treasury.gov/about/organizational-structure/offices/Pages/Office-of-Foreign-Assets-Control.aspx) and all other legal and regulatory requirements, whether as a matter of law or Bank policy.

The European Union ("EU") maintains sanctions and restrictive measures which apply across all its member states and, HRB entities operating within the EU must comply with EU sanctions programs (http://eeas.europa.eu/cfsp/sanctions/index_en.htm). Other countries where HRB operates may also impose service restrictions with which HRB must comply. OFAC sanctions prohibit or restrict HRB from engaging in activities that involve sanctioned persons or comprehensively sanctioned countries and regions. Depending on the sanctions, HRB may be required to freeze assets, reject transactions, not extend credit, or provide services, or take other specific actions.

With respect to comprehensively sanctioned countries and regions, Hamilton Reserve Bank fully complies with OFAC guidelines and requirements: https://ofac.treasury.gov/sanctions-programs-and-country-information

HRB customers must ensure that none of their investments, banking services, goods or trade involving sanctioned persons, countries or regions are sent to or processed through HRB or are funded or otherwise facilitated by financing or services provided by Hamilton Reserve Bank. HRB will take appropriate action, including blocking or rejecting funds, with respect to transactions or suspicious activities that may violate applicable AML laws.

Questions: Please contact the Bank directly should you have any questions:

Attn: Legal Department
Hamilton Reserve Bank
Hamilton Reserve Bank Plaza
Nevis, Saint Kitts and Nevis
Telephone: +1 (869) 469-8889

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