



KeyBank National Association

Kimberly N. Lacey
Chief Anti-Money Laundering/Bank Secrecy Act Officer
Financial Crimes Governance

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Corporate_Compliance@keybank.com

Re: Statement of Compliance with AML Laws

To Whom It May Concern:

On October 26, 2001, the USA PATRIOT Act¹ was enacted, mandating that every financial institution establish an anti-money laundering program designed to facilitate the prevention, detection and prosecution of international money laundering and the financing of terrorism. Key fully supports the United States federal government's efforts to combat terrorism and money-laundering. KeyBank, a KeyCorp subsidiary, is regulated by the Office of the Comptroller of the Currency, a bureau of the United States Treasury Department. The United States has been a Financial Action Task Force member country since 1990.

It is the policy of KeyCorp and all of its subsidiaries to conduct business with individuals and companies operating within the law. Key maintains a program of policies, procedures and guidelines specifically designed to comply with all United States anti-money laundering and counter-terrorist financing laws. These policies, procedures and guidelines apply equally to Key's operations outside the United States. Key's policies are designed to reduce the likelihood that the corporation, any subsidiary or any employee will become the victim of, or unknowingly participate in any illegal activity. These policies help fight terrorism and money-laundering and protect customers from losses from fraud and other illegal activity.

As part of its anti-money laundering program, Key maintains reasonable procedures to determine the identity of each prospective customer and ascertain whether they are on the Office of Foreign Assets Control list or a similar list provided by a U.S. governmental or regulatory body prior to initiating a business relationship. In addition, Key performs risk-based client due diligence in order to assist Key in the identification of potentially high risk customers. Key also has implemented other reasonable controls including monitoring of our customer base and their transactions to aid in the identification of potentially suspicious activity, annual anti-money laundering training to employees and annual independent testing of Key's anti-money laundering program.

Key offers a full spectrum of financial products and services to its customers. Key's anti-money laundering program applies to all activities and operations and is tailored to address the unique risks and vulnerabilities of each particular division of the corporation. Key takes its regulatory obligations seriously and is committed to meeting all compliance requirements. Key's statement of compliance with AML laws is not a certification for the purposes of reliance with the USA PATRIOT Act. Please note that the undersigned is the board designated anti-money laundering officer.

Key is a U.S. Withholding Agent and is fully compliant with FATCA in terms of our status.

Thank you for choosing Key. If you have any questions regarding Key's policies, you may contact Key Corporate Compliance by email at corporate.compliance@keybank.com.

Very truly yours,

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¹ Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism Act of 2001, Public Law No. 107-56, 115 Stat. 272 (2001).