



Subject: Anti-Money Laundering and Office of Foreign Assets Control Programs as of 2023

Atlantic Union Bankshares Corporation (Nasdaq: AUB) headquartered in Richmond, Virginia, is the holding company for Atlantic Union Bank. Atlantic Union Bank also operates Atlantic Union Bank Wealth Management, a brand name used by certain Bank divisions, subsidiaries and affiliates when providing asset management, private banking, and trust and estate services. Atlantic Union Bankshares Corporation, Atlantic Union Bank and its non-bank affiliates (collectively referred herein as “Atlantic Union Bank”) are supervised by, among others, the Board of Governors of the Federal Reserve System (specifically the Federal Reserve Bank of Richmond), the Virginia State Corporation Commission, the Securities and Exchange Commission, and the Financial Industry Regulatory Authority.

Atlantic Union has implemented enterprise-wide risk-based BSA AML and OFAC Programs reasonably designed to comply with the requirements imposed by all applicable anti-money laundering (“AML”) and anti-terrorism financing initiatives, statutes, rules, and regulations, including without limitation the USA PATRIOT Act, the Bank Secrecy Act (“BSA”), and the statutes, rules, and regulations administered by the U.S. Department of the Treasury’s Office of Foreign Assets Control (“OFAC”) and the Financial Crimes Enforcement Network (“FinCEN”).

Atlantic Union Bank has appointed the Director of Financial Investigations as the BSA AML OFAC Compliance Officer (“BSA Officer”), who leads a team of experienced individuals and administers and oversees the enterprise-wide, risk-based BSA/AML and OFAC Compliance Programs. Atlantic Union Bank’s Programs provide a system of written policies, procedures, and internal controls that are routinely evaluated through the production of required risk assessments, updated, and enhanced in order to reflect changes to Atlantic Union Bank’s business activities, as well as to ensure compliance with applicable supervisory standards and legal requirements. The attached Wolfsberg Questionnaire provides an overview of Atlantic Union’s AML policies and practices.

Atlantic Union Bank is committed to its obligation to work collaboratively with government agencies, regulatory authorities, and other members of the financial industry to thwart financial channels relied upon by terrorists and money launderers seeking to use for illicit purposes.

Regards,

Rebecca Schauer Robertson

Rebecca Schauer Robertson CAMS-Audit, CFE, CAFP, CCCI
SVP Director Financial Investigations Unit

Attachment: Atlantic Union Bank Wolfsberg Questionnaire completed as of 2023





Financial Institution Name:

Location (Country) :

No #	Question	Answer
1. ENTITY & OWNERSHIP		
1	Full Legal name	
2	Append a list of foreign branches which are covered by this questionnaire (if applicable)	
3	Full Legal (Registered) Address	
4	Full Primary Business Address (if different from above)	
5	Date of Entity incorporation / establishment	
6	Select type of ownership and append an ownership chart if available	
6 a	Publicly Traded (25% of shares publicly traded)	
6 a1	If Y, indicate the exchange traded on and ticker symbol	
6 b	Member Owned / Mutual	
6 c	Government or State Owned by 25% or more	
6 d	Privately Owned	
6 d1	If Y, provide details of shareholders or ultimate beneficial owners with a holding of 10% or more	
7	% of the Entity's total shares composed of bearer shares	
8	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL) ?	
8 a	If Y, provide the name of the relevant branch/es which operate under an OBL	

2. AML, CTF & SANCTIONS PROGRAMME		
9	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components:	
9 a	Appointed Officer with sufficient experience / expertise	
9 b	Cash Reporting	
9 c	CDD	
9 d	EDD	
9 e	Beneficial Ownership	
9 f	Independent Testing	
9 g	Periodic Review	
9 h	Policies and Procedures	
9 i	Risk Assessment	
9 j	Sanctions	
9 k	PEP Screening	
9 l	Adverse Information Screening	
9 m	Suspicious Activity Reporting	
9 n	Training and Education	
9 o	Transaction Monitoring	
10	Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee?	
11	Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme?	
11a	If Y, provide further details	

3. ANTI BRIBERY & CORRUPTION

12	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	
13	Does the Entity's internal audit function or other independent third party cover ABC Policies and Procedures?	
14	Does the Entity provide mandatory ABC training to:	
14 a	Board and Senior Committee Management	
14 b	1st Line of Defence	
14 c	2nd Line of Defence	
14 d	3rd Line of Defence	
14 e	3rd parties to which specific compliance activities subject to ABC risk have been outsourced	
14 f	Non-employed workers as appropriate (contractors / consultants)	

4. AML, CTF & SANCTIONS POLICIES & PROCEDURES

15	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:	
15 a	Money laundering	
15 b	Terrorist financing	
15 c	Sanctions violations	
16	Does the Entity have policies and procedures that:	
16 a	Prohibit the opening and keeping of anonymous and fictitious named accounts	
16 b	Prohibit the opening and keeping of accounts for unlicensed banks and / or NBFIs	
16 c	Prohibit dealing with other entities that provide banking services to unlicensed banks	
16 d	Prohibit accounts / relationships with shell banks	
16 e	Prohibit dealing with another Entity that provides services to shell banks	
16 f	Prohibit opening and keeping of accounts for Section 311 designated entities	
16 g	Prohibit opening and keeping of accounts for any of unlicensed / unregulated remittance agents, exchanges houses, casa de cambio, bureaux de change or money transfer agents	
16 h	Assess the risks of relationships with domestic and foreign PEPs, including their family and close associates	
16 i	Define escalation processes for financial crime risk issues	
16 j	Specify how potentially suspicious activity identified by employees is to be escalated and investigated	
16 k	Outline the processes regarding screening for sanctions, PEPs and negative media	
17	Has the Entity defined a risk tolerance statement or similar document which defines a risk boundary around their business?	
18	Does the Entity have a record retention procedures that comply with applicable laws?	
18 a	If Y, what is the retention period?	

5. KYC, CDD and EDD

19	Does the Entity verify the identity of the customer?	
20	Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days	
21	Which of the following does the Entity gather and retain when conducting CDD? Select all that apply:	
21 a	Ownership structure	
21 b	Customer identification	
21 c	Expected activity	
21 d	Nature of business / employment	
21 e	Product usage	
21 f	Purpose and nature of relationship	
21 g	Source of funds	
21 h	Source of wealth	
22	Are each of the following identified:	
22 a	Ultimate beneficial ownership	
22 a1	Are ultimate beneficial owners verified?	
22 b	Authorised signatories (where applicable)	
22 c	Key controllers	
22 d	Other relevant parties	
23	Does the due diligence process result in customers receiving a risk classification?	
24	Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
25	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs?	
26	Does the Entity have a process to review and update customer information based on:	
26 a	KYC renewal	
26 b	Trigger event	

27	From the list below, which categories of customers or industries are subject to EDD and / or are restricted, or prohibited by the Entity's FCC programme?	
27 a	Non-account customers	
27 b	Non-resident customers	
27 c	Shell banks	
27 d	MVTS/ MSB customers	
27 e	PEPs	
27 f	PEP Related	
27 g	PEP Close Associate	
27 h	Correspondent Banks	
27 h1	If EDD or EDD & restricted, does the EDD assessment contain the elements as set out in the Wolfsberg Correspondent Banking Principles 2014?	
27 i	Arms, defense, military	
27 j	Atomic power	
27 k	Extractive industries	
27 l	Precious metals and stones	
27 m	Unregulated charities	
27 n	Regulated charities	
27 o	Red light business / Adult entertainment	
27 p	Non-Government Organisations	
27 q	Virtual currencies	
27 r	Marijuana	
27 s	Embassies / Consulates	
27 t	Gambling	
27 u	Payment Service Provider	
27 v	Other (specify)	
28	If restricted, provide details of the restriction	

6. MONITORING & REPORTING		
29	Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity?	
30	What is the method used by the Entity to monitor transactions for suspicious activities?	
31	Does the Entity have regulatory requirements to report suspicious transactions?	
31 a	If Y, does the Entity have policies, procedures and processes to comply with suspicious transactions reporting requirements?	
32	Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity?	

7. PAYMENT TRANSPARENCY		
33	Does the Entity adhere to the Wolfsberg Group Payment Transparency Standards?	
34	Does the Entity have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with:	
34 a	FATF Recommendation 16	
34 b	Local Regulations	
34 b1	Specify the regulation	
34 c	If N, explain	

8. SANCTIONS

35	Does the Entity have policies, procedures or other controls reasonably designed to prohibit and / or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and / or masking, of sanctions relevant information in cross border transactions?	
36	Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists?	
37	Select the Sanctions Lists used by the Entity in its sanctions screening processes:	
37 a	Consolidated United Nations Security Council Sanctions List (UN)	
37 b	United States Department of the Treasury's Office of Foreign Assets Control (OFAC)	
37 c	Office of Financial Sanctions Implementation HMT (OFSI)	
37 d	European Union Consolidated List (EU)	
37 e	Lists maintained by other G7 member countries	
37 f	Other (specify)	
38	Does the Entity have a physical presence, e.g., branches, subsidiaries, or representative offices located in countries / regions against which UN, OFAC, OFSI, EU and G7 member countries have enacted comprehensive jurisdiction-based Sanctions?	

9. TRAINING & EDUCATION		
39	Does the Entity provide mandatory training, which includes :	
39 a	Identification and reporting of transactions to government authorities	
39 b	Examples of different forms of money laundering, terrorist financing and sanctions violations relevant for the types of products and services offered	
39 c	Internal policies for controlling money laundering, terrorist financing and sanctions violations	
39 d	New issues that occur in the market, e.g., significant regulatory actions or new regulations	
40	Is the above mandatory training provided to :	
40 a	Board and Senior Committee Management	
40 b	1st Line of Defence	
40 c	2nd Line of Defence	
40 d	3rd Line of Defence	
40 e	3rd parties to which specific FCC activities have been outsourced	
40 f	Non-employed workers (contractors / consultants)	

10. AUDIT

41	In addition to inspections by the government supervisors / regulators, does the Entity have an internal audit function, a testing function or other independent third party, or both, that assesses FCC AML, CTF and Sanctions policies and practices on a regular basis?	
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Signature Page

Wolfsberg Group Financial Crime Compliance Questionnaire 2020 (FCCQ V1.1)

(Financial Institution name)

I, (Senior Compliance Manager- Second Line representative), certify that I have read and understood this declaration, that the answers provided in this Wolfsberg FCCQ are complete and correct to my honest belief.

Rebecca Schauer Robertson 3.2023
(Signature & Date)