

## **CUSTOMER IDENTIFICATION PROGRAM (CIP) NOTICE**

### **Important Information About Procedures for Opening a New Account**

To help the US government fight the funding of terrorism and money laundering activities, federal law requires financial institutions to obtain, verify, and record information that identifies each person who opens and maintains an account.

This notice explains the information we collect under our Customer Identification Program (“CIP”) and why it is required. If you have questions, please contact us before opening an account.

### ***What Information Are We Required to Collect?***

When you open an account, we are required to obtain the following information from each individual account holder:

- **Full Name**
- **Date of birth**
- **Residential or Business address**
- **Identification number**, as applicable:
  - U.S. citizens or U.S. residents:**
    - Social Security Number (SSN) or Employer Identification Number (EIN)
  - Non-U.S. citizens or non-U.S. residents:**
    - Passport number and country of issuance
    - Taxpayer Identification Number (If applicable)
    - Alien identification card number
    - Other government-issued identification evidencing nationality, residence and bearing a photograph of you.

We may also request a copy of your driver's license or other identifying documents to help verify your identity.

### ***Information for Legal Entities***

If the account is opened by or on behalf of a corporations partnerships trust or other legal entity, additional information may be required, including but not limited to:

- Legal name of entity
- Principal place of business and local office address
- Employer Identification Number (EIN)
- Certified articles of incorporation or formation documents
- Government-issued business licenses (If applicable)
- Partnership agreements or a trust agreements.
- Beneficial ownership information, as required by law

### ***Additional Information Required by Regulation***

U.S. Department of the Treasury, Securities and Exchange Commission (SEC), and FINRA rules may require us to obtain additional information, such as

- Occupation and employment information
- Annual income and net worth
- Investment experience, objectives and risk tolerance.

This information is required to comply with applicable regulatory obligations and to determine the suitability or appropriateness of certain investment products and services.

### ***What Happens If You Do Not Provide the Required Information?***

If you do not provide the requested information, or if we are unable to verify your identity:

- we may be unable to open an account for you;  
or
- If an account has already been opened, we may be required to restrict or close the account.

Last updated: January 22, 2026