

ANTI-MONEY LAUNDERING & COUNTER TERRORIST POLICY

Vantage Bank Texas is committed to safe and sound banking practices while preventing the use of its services for illicit purposes. The Bank is, therefore, committed to maintaining strict compliance with all applicable anti-money laundering and anti-terrorist financing laws, including the Bank Secrecy Act ("BSA"). Accordingly, it is the policy of Vantage Bank Texas to take all reasonable and appropriate steps to prevent money laundering, fraud, or other financial crime through the use of Vantage Bank Texas' products and services.

In order to ensure compliance with the BSA reporting requirements as well as all other antimoney laundering laws, Vantage Bank Texas maintains a Bank Secrecy Act/Anti-Money Laundering and Office of Foreign Asset Control (OFAC) Compliance Program ("BSA/AML Compliance Program"). The BSA/AML Compliance Program is designed to ensure ongoing compliance with the BSA and all anti-money laundering laws. Vantage Bank Texas is legally required to report all suspicious activity to the Financial Crimes Enforcement Network (FinCEN) of the US government.