

Anti-Money Laundering (AML) and Sanctions Program

First Commonwealth Bank has adopted and implemented an Anti-Money Laundering and Sanctions Program ("AML Program"). The AML Program complies with all applicable laws and regulations regarding sanctions, money laundering, terrorist financing, and other financial crimes.

First Commonwealth Bank is regulated by the Federal Deposit Insurance Corporation and the Pennsylvania Department of Banking and Securities.

First Commonwealth has implemented a risk-based, enterprise-wide AML Program that complies with both the specific provisions and the spirit of all relevant laws and regulations. The AML Program includes, but is not limited to:

- Appointment of an AML Officer
- A Customer Identification Program designed to identify and verify all customers, and where applicable, beneficial owners, to the extent warranted by the risk of money laundering or terrorist financing, or as required by regulation
- Performing Customer Due Diligence and Enhanced Due Diligence on higher risk customers
- Regular independent testing
- An AML training program for appropriate personnel
- Processes and systems to monitor customer transactions and to identify potentially suspicious activity
- Reporting of suspicious activity to appropriate regulatory bodies
- Forbidding direct or indirect services to shell banks
- Policies and controls to ensure compliance with sanctions programs

The Board of Directors has appointed an AML Officer who serves as First Commonwealth's primary point of contact with regulatory authorities on AML and sanctions matters and oversees First Commonwealth's compliance with AML and sanctions requirements.