



Emma Waddell
Executive Vice President
Chief Compliance and AML
Officer

SunTrust Banks, Inc.
303 Peachtree St
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Anti-Money Laundering and Economic Sanctions Compliance Certification

This Certification is for the use of financial institutions requiring documentation of SunTrust Banks, Inc. and its subsidiaries' compliance with anti-money laundering and economic and trade sanctions laws and regulations.

SunTrust Banks, Inc. is a bank holding company headquartered in Atlanta, Georgia. It is the policy of SunTrust Banks, Inc. and its subsidiaries, including SunTrust Bank, a Georgia banking corporation and member bank of the Federal Reserve System (collectively, the "Company") to comply with all applicable federal laws and regulations governing anti-money laundering and U.S. economic and trade sanctions. The Company is regulated by the Board of Governors of the Federal Reserve System, the Georgia Department of Banking and Finance, and several other U.S. regulatory entities with jurisdiction over the Company's activities.

The Company is required to, and maintains, an anti-money laundering program pursuant to the requirements of the USA PATRIOT Act and regulations promulgated thereunder (the "AML Program"). The Company has appointed a Director of AML Compliance who leads a compliance organization of employees with experience in this field, which oversees the AML Program. The AML Program includes written policies and procedures designed to prevent money laundering; and specifically, internal controls for ongoing compliance, a customer identification program under Section 326 of the USA PATRIOT Act; customer due diligence and risk assessment procedures; ongoing anti-money laundering training for all employees; monitoring for, and reporting of, suspicious activity; and independent auditing to test the implementation of the Program. The Company does not transact with "shell banks".

The Company maintains a risk-based economic and trade sanctions compliance program designed to comply with sanctions programs administered and enforced by the U.S. Treasury's Office of Foreign Assets Control ("OFAC"). The Company has scanning systems and controls deployed on a risk-based approach, which it uses to scan customer and transaction data for comparison against the OFAC sanctions targets list, and reject or block transactions as required. The Company employs additional risk-based measures designed to prevent the Company from transacting or facilitating transactions that violate OFAC sanctions.