



December 15, 2008

## **General Statement on *Observance of Anti-Money Laundering Requirements***

First Bank and its branches, affiliates, and subsidiaries (collectively referred to hereinafter as “First Bank”) are firmly committed to participating in international efforts to combat money laundering and the funding of terrorist and criminal activities.

First Bank has its headquarters in Creve Coeur, Missouri, United States of America. First Bank is supervised by the U.S. Federal Reserve Board of Governors and is examined by the Federal Reserve Bank of St. Louis.

The United States is a member country of the Financial Action Task Force (FATF) and has enacted laws and rules designed to implement the anti-money laundering policies of FATF. The goal of these laws is to detect and prevent money laundering and potential terrorist financing.

First Bank implements an anti-money laundering (AML) program that is designed to comply with certain United States anti-money laundering rules as a minimum standard throughout the bank as well as with all local laws, regulations, and guidance relating to the prevention of money laundering, terrorist financing, and related financial crimes. These include written policies and procedures, a designated AML Compliance Officer, regular training for relevant employees, and an independent audit to test the implementation of the program.

As part of its anti-money laundering and anti-terrorist financing compliance efforts, First Bank takes steps to ensure that it complies with any and all restriction or embargo regulations applicable in the United States, as promulgated by the Office of Foreign Assets Control (OFAC).

First Bank uses its best efforts to ensure compliance with these prohibitions and restrictions and to detect suspicious activities. First Bank operates technical systems and/or manual monitoring systems to detect potential suspicious activities. Any such suspicious activities detected are reported to law enforcement in accordance with applicable laws.

If you have any questions or require additional information regarding First Bank’s anti-money laundering efforts, please contact:

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Sincerely,

First Bank