



M&T Bank Corporation
Bank Secrecy Act/Anti-Money Laundering and Sanctions Compliance Program

Please accept the following in response to your recent request for information about the Bank Secrecy Act/Anti-Money Laundering (“BSA/AML”) and Office of Foreign Assets Control (“OFAC”) policies of M&T Bank Corporation (“M&T Bank”), which is applicable to all of its subsidiaries and affiliates¹, including Wilmington Trust and M&T Securities.

The Board of Directors of M&T Bank assigns the highest priority to compliance with the provisions of the Bank Secrecy Act (“BSA”), the USA PATRIOT Act, and the implementing regulations of the U.S. Department of the Treasury. M&T Bank’s BSA/AML compliance program is administered

include:

- Ø A system of internal controls – M&T Bank maintains operating procedures that are designed to establish a bank-wide system of internal controls to ensure compliance with the customer identification, reporting and recordkeeping requirements of the BSA, the USA PATRIOT Act and their implementing regulations, including identification and reporting of suspicious activity.
- Ø Independent testing for compliance – M&T Bank’s Internal Audit Department is responsible for the independent evaluation of the system of internal controls established by the compliance program and conducts an annual audit of the compliance program and its implementing procedures. The findings of the annual audit are reported to responsible management and the Board of Directors together with any recommendations for improvement.
- Ø Designation of an individual or individuals responsible for coordinating and monitoring compliance – The M&T Bank Board of Directors n 345
- Ø Training for all appropriate personnel – M&T Bank administers a comprehensive training program for newly hired personnel and annually for current employees who have operational responsibilities under the compliance program. The BSA/AML/Sanctions Officer ensures the administration of and provides compliance support and expertise for the ongoing program of training for M&T Bank personnel.

M&T Bank Corporation wholly owned bank subsidiaries include Manufacturers and Traders Trust Company, M&T Securities, Inc., Wilmington Funds Management Corporation, and Wilmington Trust, National Association. Manufacturers and Traders Trust Company subsidiaries include Wilmington Trust Company, Wilmington Trust Investment Advisors, Inc., People’s United Advisors, Inc., M&T Equipment Finance Corp, M&T Capital and Leasing Corp., LEAF Commercial Capital, Inc., and M&T Realty Capital Corporation. Wilmington Trust SP Services, Inc. is a wholly owned subsidiary of Wilmington Trust, N.A. The Wilmington Trust European offices: Wilmington Trust SP Services (Dublin) Limited, Wilmington Trust (London) Limited, Wilmington Trust SP Services (Frankfurt) GmbH, and Wilmington Trust SP Services (London) Limited, Wilmington Trust (Milano) S.r.l and Wilmington Trust SAS are indirect, wholly owned subsidiaries of M&T Corporation.

