FirstCitizensBank

Sanctions Due Diligence Questionnaire

Company Name: WORLD BEYOND WAR and DAVID C SWANSON

Respondent Name & Title: _____

Date: _____

Please answer the following sanctions due diligence questions to the best of your knowledge and in a detailed manner*:

- Do you or any associated companies have any Director, Board Member, Controller, Investor, or Beneficial Owner who is a national or resident of a country/region subject to **Targeted** or **Comprehensive Sanctions**?
  - If so, please provide details.

- Please provide a current, detailed cap table and legal entity org chart. For investments through third parties, please specify the ultimate owner.

- Do you or any associated companies have any physical business operations (including an office), either directly or through an affiliated company, in a country/region subject to **Targeted** or **Comprehensive Sanctions**?
  - If so, please provide details.

- What is your current exposure (direct/indirect) to **Russia, Ukraine** and/or **Belarus?**

  - If applicable, please provide details about this activity, including employees/contractors, vendors, partners, clients/customers/users, etc.

    - Please confirm that activity involving **Ukraine** will not have a nexus to **Crimea, Donetsk (DNR), and Luhansk (LNR)**

    - Please confirm that activity involving **Russia/Belarus** will not involve any **Sanctions Targets**, including sanctioned banks (i.e., Sberbank, VTB, Belinvestbank, Bank Dabrabyt).

  - If applicable, please provide details with respect to any Director/Investor/Beneficial Owner/Controller/Board Member with a nexus to **Russia, Belarus or Ukraine**.

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- What is your current exposure (direct/indirect) to **Myanmar/Burma, Venezuela** and/or **Afghanistan**?
  - If applicable, please provide details about this activity, including employees/contractors, vendors, partners, clients/customers/users, etc.

    - If conducting business with a nexus to **Venezuela**, please provide details about that activity and confirm whether there is any nexus to the **Government of Venezuela**.

    - If conducting business with a nexus to **Afghanistan**, please provide details about that activity.

    - If conducting business with a nexus to **Myanmar/Burma,** please provide details about that activity.

  - If you have exposure to **Venezuela, Myanmar/Burma** and/or **Afghanistan**, please provide details about your controls to ensure compliance with applicable sanctions.

- Are you or any associated companies engaged in or plan to engage in transactions, services, investments, business, or other dealings (this may include vendors, partners, clients/customers/users, etc.) which directly or indirectly involve or benefit any **Sanctions Targets**? If so, please provide details.

- Are you or any associated companies engaged in or plan to engage in transactions, services, investments, business, or other dealings (this may include vendors, partners, clients/customers/users, etc.) which directly or indirectly involve or benefit any countries/regions subject to **Comprehensive Sanctions**? If so, please provide details.

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- What sanctions controls do you maintain or plan to implement to ensure compliance with applicable sanctions regulations (i.e., IP blocking, sanctions screening, client/vendor/counterparty due diligence, etc.)? Please provide details about your controls and due diligence process(es).

  - If applicable, do you employ controls or plan to implement controls to ensure *employees/contractors* are not located in countries/regions subject to **Comprehensive Sanctions**? If so, please provide details.

  - Do you have any controls or plan to implement controls to restrict *vendors, partners, clients/customers/users* from countries/regions subject to **Comprehensive Sanctions**? If so, please provide details.

- Please confirm that FCB accounts/products/services will not be used to conduct any activity with any **Sanctions Targets** and/or countries/regions subject to **Comprehensive Sanctions** and will not provide any services/activities prohibited by sanctions regulations, including the Office of Foreign Assets Control (OFAC).

Due Diligence Questions:

- How much time do you spend in Cuba each year? Please provide specifics.
- Have you previously conducted activity or intend to conduct any activity that involves a direct or indirect nexus to Cuba?
  - If so, what other banks or payment processors do you utilize for transactions involving Cuba, or do you intend to use in the future?

*Sanctions imposed by the Office of Foreign Assets Control (OFAC), the United Nations (UN), the European Union (EU), or the United Kingdom (UK).

Comprehensive Sanctions: Crimea, Donetsk People's Republic (DNR) and Luhansk People's Republic (LNR) Regions of Ukraine, Cuba, Iran, North Korea, and Syria

Targeted Sanctions: Included countries are limited to Russia, Ukraine, Venezuela, Afghanistan, Belarus, Myanmar/Burma

"Sanctions Targets" include:

- OFAC Specially Designated Nationals ("SDNs"), for which full blocking sanctions apply. This includes any individual/entity designated by OFAC as an SDN or owned 50% or more/controlled by an individual/entity designated by OFAC.
- Entities on the SSI, NS-MBS, NS-CMIC, or similar lists that are subject to sanctions but not full blocking sanctions.
- Individuals/entities subject to UN/UK/EU Sanctions.

"Government of Venezuela" includes the state and Government of Venezuela, any political subdivision, agency, or instrumentality thereof, including the Central Bank of Venezuela and Petroleos de Venezuela, S.A. (PdVSA), any person owned or controlled, directly or indirectly, by the foregoing, and any person who has acted or purported to act directly or indirectly for or on behalf of, any of the foregoing, including as a member of the Maduro regime.

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