

Digital Banking Policy – Bank of America, N.A. India

This digital banking policy governs the use of Bank of America's internet banking offering (CashPro® Online). Bank of America, N. A. India (hereinafter referred to as "BANA" or "the Bank") only offers corporate banking services in the country and our customer set consists of large multinationals, Indian corporates and large financial institutions. The bank does not have any retail banking presence in the country. The Bank's internet banking platforms in India offer select capabilities pertaining to corporate cash management (account and information reporting, analytics, payment processing, alerts, etc.), corporate trade, supply chain management, trade financing, etc.

Internet banking services in India is only provided to client in the Bank's India branches, who have submitted the relevant KYC documents as stipulated by the Reserve Bank of India (RBI) from time to time and in accordance with the KYC & AML Framework & Procedures of the Bank. India specific products are restricted to account holders holding accounts with the Bank's branches in India and is not offered in other jurisdictions. Further, customer account opening and stop payment requests are not offered through internet banking in India. All products offered over the bank's internet banking platform in India are subject to the terms and conditions of applicable agreements ("Agreements") and in accordance with the applicable local law and you are bound by the same. This policy is for information purpose only and should not be construed as a substitute for the Agreements.

In relation to your proposed usage and / or participation in and / or access to one or more of the services (the "Services") that can be accessed through Bank of America CashPro® and / or any successor access channel(s) offered by us from time to time (the "Website"), we hereby request you to read very carefully our Privacy Policy. This Privacy Policy explains how we collect, handle and transfer all private, confidential, personal or banking information about you and / or your business and / or accounts (collectively "Information") to and between countries that may not have well-developed or equivalent data protection or banking secrecy legislation or may have different and varying degrees of data protection and banking secrecy laws as compared to those in the country or city where you are located or incorporated or carrying on business or your accounts are located, and your use of the website signifies your agreement to such handling and usage and consent to the transfer and possible disclosure of your Information through the website in the course of and for the services. The Privacy Policy for the use of the services may be different from the privacy policy utilized for other Bank of America, N.A. services. In addition, by using the website, you may have access to links to other websites (each a "Linked Website"), each of which may have a separate privacy policy. In the event of any conflict between this Privacy Policy and the privacy policy of any linked website, the privacy policy of the linked website shall control.

In this Digital Banking Policy references to "you" or "your" means:

- You as an authorized person of the Bank's corporate customer; and
- If you are accessing the website for any services provided by us from time to time on behalf of your employer or a subsidiary or an affiliate of your employer, includes you in your individual capacity and your employer and any subsidiary or affiliate of your employer

References to "we", "us" or "Bank of America" means Bank of America, N.A., (BANA)

Bank's online practices fall into three main areas:

- Gathering and using, handling and transferring online information. The Bank gathers and uses information so we can better serve your needs
- Protecting your security online. The Bank employs technology and other security practices shown to protect personal and business information from unauthorized disclosure or use
- Linking to other sites. The Bank may provide links to other companies' sites to bring you products and services.

DIGITAL BANKING SERVICES

The services include local currency products and foreign exchange products. BANA India may offer its customers internet-based platform for foreign exchange services, for permitted underlying transactions, subject to compliance with the following additional terms and conditions:

- The data relating to BANA India will be kept segregated wherever required by regulations
- BANA India may offer its customers internet-based platform for foreign exchange services, for permitted underlying transactions, subject to compliance with FEMA regulations and certain terms and conditions
- The services offered for dealing in foreign exchange, shall allow only reporting and initiation (including approval) of foreign exchange related transactions

LIQUIDITY AND OPERATIONAL RISK MANAGEMENT

BANA monitors and manages liquidity risks arising from client-initiated transactions through digital banking channels. All inflows and outflows get accounted for into BANA's ongoing liquidity management including daily liquidity monitoring and intraday liquidity assessments. Amount based thresholds shall be maintained for transactions initiated during non-business hours to mitigate any liquidity risks.

BANA maintains a robust operational risk management framework for all digital banking services. This includes ensuring high system availability, secure authentication controls, resilience through disaster recovery capabilities, and continuous monitoring of digital transactions to detect fraud, anomalies, and system failures. All incidents relating to digital banking operations including system downtime, or security breaches shall be logged, investigated, and reported in line with regulatory expectations.

YOUR ROLE

Taking Individual Responsibility for Protecting Personal Information.

You play an important role in safeguarding any personal and business information you may share online. While Bank of America works to protect your privacy, you also play an important role in protecting and maintaining any personal information you may share online.

To help safeguard your information, we suggest the following:

- Please keep us informed of changes to you and your company's contact or other details by contacting the contacts for your region as described under "Contacting Us"
- Do not share your account information, user ID or password or any related sensitive information with anyone either over the phone, email or through any third-party sites over the internet. We do not ask for such sensitive personal information at any time so please do not reveal such information with anyone posing as the bank's representative including over telephone or email
- Never provide confidential information to unknown callers
- Please be mindful of attractive offers made by fraudsters through the internet
- Change your password regularly and avoid writing down your user ID or password
- Avoid using birthdays and anniversaries or such common dates / events and any combinations of the same as passwords
- Remember to sign off once you have completed a secure online session
- Only provide your user ID when your browser indicates an encrypted connection, such as Secure Socket Layer (SSL), directly to the Website or to another site you have investigated and fully trust

GATHERING INFORMATION

Bank of America where relevant gathers information and data from you in various ways:

- When you register online;

- By our use of "Cookies" (see next section);
- During your use of the Website; and
- In your transactions with us

Much of this data may be comprised of business information and confidential information. Some of it may comprise personal data about individuals (i.e., name, surname, phone number, email, employer, bank account information, or transaction information), to which data protection laws apply, or about bank account information, to which banking secrecy laws apply. We do not collect sensitive personal data about you through this Website. The bank's Privacy Policy describes Bank of America's approach to fulfilling our obligations under the applicable data protection laws and the banking secrecy laws and to our use, handling and transfer of the Information we receive about you.

BENEFICIARIES

To the extent that you provide information about transaction beneficiaries to this website, you agree that you, your employer, or the subsidiary or affiliate of your employer, has complied with applicable data protection and other laws in respect of such information, including notifying the transaction beneficiaries of the disclosure of their data to us, obtaining their prior consent thereto where legally required, and our use, handling and transfer of the data for the purposes of completing and performing the requested transactions, complying with bank policies on anti-money laundering and other matters, and otherwise complying with applicable legal requirements.

COOKIES

This website uses persistent and / or session cookies. Persistent cookies remain on your computer until you delete them, or they expire. Session, or transient, cookies do not stay on your computer after you close your browser to conclude your current session.

A cookie is a piece of information that is stored in the browser's memory. Cookies can contain a variety of information relating to your use of a website and your requirements or interests. This may range from a simple count of how often you visit a website to information which allows customization of a website for your use.

Bank of America may use these cookies to customize the website, to identify you as an authorized user, and to display information more effectively to our users. We also may use these cookies to gather data and information about the usage of our website. We do not use cookies to collect or store personally identifiable information about you. Any time when cookies are used, the information is encrypted for our use only and should be protected from third party access. If you wish to control or

prevent the use of cookies, you may utilize the tools on your Internet browser to do so. Please note, however, that you may be required to enable cookies to use parts of the website.

SECURE TRANSMISSIONS

To ensure information remains confidential, BANA uses encryption technology such as Secure Socket Layer (SSL) on the website to transmit information between you and us

RECEIVING INFORMATION

It is expressly understood that you remain solely responsible for the use of this platform in accordance with the terms and conditions of the Agreements executed by you. Any information / instructions received by us through this platform will be deemed to have been duly authorized by you and it is your sole responsibility to ensure all necessary actions have been taken at your end for authenticating such information / instructions in accordance with your organizational or constitutional document.

USING INFORMATION

Bank of America handles and uses the information we collect for the following purposes:

- To identify you as a representative of your corporate entity.
- To provide efficient and timely services and deal with your inquiries and transaction needs.
- Where necessary to provide data to our subsidiaries, affiliates or branches, or other banks or third parties which provide services to us, to facilitate the completion of a transaction, to comply with our anti-money laundering or other compliance programs, for record keeping or in fulfillment of other legal or business requirements.

Information may be disclosed to: regulatory or government bodies, central banks, securities exchanges, law enforcement authorities, or other third parties where we are required or permitted by law or governmental regulations, central bank rules and practices or any securities exchange or regulatory or governmental body to which we or you are subject or submit; to auditors or other third parties with regard to an audit or inspection; or to beneficiaries, customers, or other third parties when such disclosure is necessary for us to process your requests or transactions. Bank of America does not and shall not sell, rent or otherwise commercially exploit your personal or business data. The Bank also does not and shall not use the data so collected for the purpose of cross selling any other products by any of its affiliates or subsidiaries or cross border branch.

STORAGE OF DATA AND USE BY SERVICE PROVIDERS

Our servers used for these services may be located in the United States or other parts of the world, including jurisdictions that may not have the same data protection and banking secrecy requirements as those in your jurisdiction. The bank shall however ensure that relevant data is stored only in servers located within India, in accordance with extant local guidelines. We may use information technology and other subcontractors to provide storage and other services to us (including contingency, back up, and other information technology support services). Your use of the website signifies your authorization and agreement that we may disclose all information now or hereafter received or possessed by us to third parties who work for us in order to facilitate transactions and / or our provision of services to you. Any third party engaged to provide these services will be required to act solely on our instructions in relation to the treatment of your information and will agree to keep the information secure and confidential.

DATA EXPORT

For the purposes outlined above, wherever permissible as per extant local guidelines we may send your data to other international jurisdictions which may not have well developed data protection or banking secrecy laws. However, we only intend to transfer your Information to Bank of America or our subsidiaries, affiliates, and branches and to persons providing services to us as described above (under the headings "Using Information" and "Storage of Data and Use by Service Providers") wherever they are located which may in turn transfer it to Bank of America or our subsidiaries, affiliates, and branches or other service providers in other locations. We also may transfer Information to regulatory or government authorities, central banks, securities exchanges, or law enforcement where required by law, or otherwise necessary in connection with our anti-money laundering or other compliance programs. For any queries on the above, we can be contacted as described under "Contacting Us" below.

You may not have rights under data protection laws or banking secrecy laws in those locations and there may even be no such laws in some of these locations.

Your use of the website constitutes your consent to the transfer, use and disclosure of your information as outlined above.

PROTECTING YOUR SECURITY AND CONFIDENTIALITY ONLINE

Keeping financial and personal information secure is one of our most important responsibilities. We value your trust and handle personal and bank account information and data with care. We have taken all reasonable steps to ensure the security of personal information transmitted and transactions conducted. These include encryption, filters and firewalls. Also, our service requires you to change

your password periodically. Notwithstanding, there will always be a remote possibility that data security violations may occur. New advances in security technology frequently occur and we diligently review and evaluate our online security measures in that regard. However, complete confidentiality is not yet possible over the internet. Please note that BANA will report to regulator on every breach or failure of security systems and procedure.

CYBER SECURITY AWARENESS AND PAYMENT FRAUDS

BANA has put in place the following procedures towards creating awareness around cyber security and help protect you from payments related frauds:

- BANA has robust fraud monitoring tools in place to detect and prevent suspicious activities.
- BANA's banking website includes information on the internet banking usage guidelines, training materials, along with the list of Do's and Don'ts, to help protect you from cyber frauds.

BANA creates cyber security awareness through periodic webinars, emails, etc. on a periodic basis.

CUSTOMER PROTECTION FOR UNAUTHORIZED ELECTRONIC BANKING TRANSACTIONS

Customer can report unauthorized transactions through any of the bank's approved channels. Liability if any arising from unauthorized transactions will be determined as per the Agreement executed between you and the bank.

PERSONAL DATA ACCESS

You have the right to access personal data that we hold about you, and to request that we modify, amend, correct, or erase any personal data that is incomplete, inaccurate, outdated or not used in accordance with applicable laws. We reserve the right to verify to our reasonable satisfaction the accuracy and completeness of any requested modifications or amendments. To obtain more information regarding exercising such rights, you may contact us as described under "Contacting Us" below. We may seek satisfactory proof of identification. In instances where your registration information or other personal data is provided to us by your employer or the subsidiary or affiliate of your employer, you may also need to contact such entity to modify or amend such data.

CONTACTING US

If you have any questions / complaints, and/or if you wish to notify us regarding any loss, theft, misappropriation or other unauthorized use of a user ID, password or other security feature related to the website or the services. For any technical queries please reach us at asia.tcc@bofa.com, for any other queries, please contact our service team at india.clientservices@bofa.com or you can also reach by phone at these numbers:

Mumbai: 91.22.66323039/74/84, Toll Free: 000.800.440.2315
Bangalore: 91.80.66006209, Toll Free: 000.800.440.2317
Chennai: 91.44.69904586, Toll Free: 1800.419.4409
Delhi: 91.11.66162084/2547/2323 Toll Free: 000.800.440.2342

Bank of America may change the above contact information from time to time and in such event shall suitably notify you.

BANKING OMBUDSMAN SCHEME

If you do not receive a response from us within one month after we have received the complaint, or if you are not satisfied with the reply given by us, you may approach the banking ombudsman. The details of the banking ombudsman scheme as well as the contact details of the ombudsman for respective city or state are available on www.bankingombudsman.rbi.org.in.

LINKING TO OTHER SITES

We may provide links to non-Bank of America companies, such as credit bureaus or merchants. If you choose to link to websites not controlled by Bank of America, we are not responsible for the privacy or security of these sites, or for the accuracy, completeness, reliability, suitability or quality of their information, products or services. The use of such links is entirely at your own risk. We do not accept any responsibility or liability for the content, use or availability of such web sites. The listing of an organization on this site shall not be construed as an endorsement of its services or products. If you are asked to provide information on one of these websites we strongly urge you first to study carefully their privacy policies.