

Chain Bridge Bank, N.A.



BSA OFFICER JOB DESCRIPTION

REPORTS TO EVP, COMPLIANCE OFFICER/COUNSEL

BASIC QUALIFICATIONS

Education/Training: Bachelor's degree preferably in business, management, or related field; specialized BSA/AML/OFAC training. Certified Anti-Money Laundering Specialist, CAMS designation preferred.

Skill(s): Complete comprehension and familiarity with BSA/AML/OFAC/USA Patriot Act regulatory environment; fully knowledgeable of all Bank policies and procedures; excellent written, verbal, interpersonal, and analytical skills; excellent project and time management skills; strong computer skills including working knowledge of Word, Excel, and Internet applications; familiarity with BSA/AML software. Must be able to assist attorney in the preparation of documentation in response to inquiries from law enforcement, regulatory agencies, courts and outside consultants.

Experience: Minimum of seven years' experience in the banking industry, with minimum four years in BSA area.

GENERAL RESPONSIBILITIES

Responsible for maintaining and administering the Bank's BSA/AML program to ensure compliance with the Bank Secrecy Act, USA Patriot Act, and all other Anti-Money Laundering (AML) and Office of Foreign Assets Control (OFAC) laws and regulations; supports the Bank Secrecy Act training effort for the Board of Directors, appropriate management, and staff personnel; participates in briefings of management and staff on BSA/AML compliance issues and responds to BSA/AML questions. Accepts the responsibility for the identification, measurement, and monitoring of BSA/AML/OFAC risks.

ESSENTIAL DUTIES

1. Manages the BSA Department to ensure the Bank's compliance with all BSA/AML/OFAC/USA Patriot Act related federal, state, and local laws and regulations by performing the following:
 - a. Maintains, reviews, and updates the Bank's BSA/AML Program, policies, and procedures. Ensures that they are updated when changes to regulations and laws are made.
 - b. Assesses the impact of new or amended BSA/AML laws and regulations and their implications for Bank policies and procedures in conjunction with Compliance Officer/Counsel; coordinates implementation.
 - c. Performs an annual BSA risk assessment to identify and measure BSA/AML and OFAC risks associated with products and services offered by the Bank. Advises management on the development of policy, procedures, systems, controls, and training to address those risks. Prepares and utilizes Money Laundering Report to facilitate this process.
 - d. Maintain communication with regulators, internal auditors, and independent monitoring functions. Under direction of counsel, ensures that all internal audit functions, regulatory,

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and law enforcement agencies requests, findings and recommendations are complied with in a timely manner under direction of Compliance Officer/Counsel.

- e. Conducts reviews of customer accounts using applicable software and other transaction monitoring processes to analyze and investigate suspicious or unusual customer activity for identified medium and higher risk customers independently.
 - f. Conducts customer due diligence and risk assessment analysis of personal and commercial customer relationships. Conducts enhanced due diligence reviews for customers identified as higher risk.
 - g. Investigate and research ACH, wire, or any check irregularities found by Operations, facilitate efficient process for investigations and file SARs, if necessary.
 - h. Review suspicious activity detected by the use of automated system reports, referral by branch personnel or others and report unusual activities in the form of a Suspicious Activity Report (SAR) filing.
 - i. Ensure that 314(a) requests, Currency Transaction Reports (CTRs) and SARs are completed accurately and completely and filed with FinCEN on time. Serve as point of contact in FinCen secure information sharing 314(b).
 - j. Maintain ongoing development and maintenance of the Bank's automated AML software. Review effectiveness of automated system reports and recommend changes or modifications, if necessary.
 - k. Respond to BSA related questions, issues, and concerns from all department managers, bank officers, and employees.
2. Develop, maintain, and coordinate a BSA/AML and OFAC training program. Maintains all BSA/AML and OFAC training records.
 - a. Performs BSA/AML and OFAC training for new hire personnel and ongoing BSA/AML and OFAC training and education for appropriate management and staff personnel as needed.
 - b. Performs annual Board of Directors BSA/AML and OFAC training. Provides BSA/AML updates to the Board when needed.
 3. Monitors BSA/AML industry developments and maintains advanced knowledge of new and amended laws and regulations impacting the Program and Risk Assessment.
 4. Organizes the work and activities of the BSA group in order to achieve established goals; monitors the efficiency and performance of the group versus established standards.
 5. Prepares and reports developments on significant BSA matters to the Regulatory Compliance Committee, leads weekly BSA group meetings.
 6. Assists in overall Bank security.

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Compliance:

It is expected that each employee:

- *Abides by current laws and organizational policies and procedures designed and implemented to promote an environment, which is free of sexual harassment and other forms of illegal discriminatory behavior in the work place.*
- *Cooperates with, participates in and supports the adherence to all internal policies, procedures and practices in support of risk management and overall safety and soundness and the Bank's compliance with all regulatory requirements.*
- *Complies with established operating policies and procedures in order to maintain adequate controls and to support the Bank's adherence to outside regulatory requirements.*

It is understood that complying with all applicable safety and soundness and consumer compliance laws and regulations, taking the annually required consumer compliance courses, and adhering to the policies and procedures that facilitate compliance will all be factors considered when evaluating individual performance. Individual performance is rewarded in annual salary adjustments.

Bank compliance with laws and regulations is a factor considered in the calculation of incentive compensation. The ratings that the Bank receives from its regulators and its auditors are factored into the annual incentive compensation calculation. Your adherence to these laws and regulations and the policies and procedures that support them directly affect the Bank's compliance. Annual incentive compensation rewards team performance. An employee will not be eligible for incentive compensation unless he/she takes the consumer compliance courses required of all employees and all the required consumer compliance courses for his/her job description or job responsibilities by the end of each calendar year. All required consumer compliance courses for the applicable year will be outlined in the Compliance Management Program posted on the Intranet.