EXHIBIT 99

Chain Bridge Bank, N.A. Wire Transfer Policy

Revised and Approved by the Board of Directors in March, 2014
Re-Adopted by the Board of Directors in January, 2020

WIRE TRANSFER POLICY

POLICY STATEMENT

Chain Bridge Bank, N.A. provides customers with the ability to transfer funds to other financial institutions, both domestic and international, by wire. It is the policy of Chain Bridge Bank, N.A. to comply with all rules and regulations regarding wire transfers. In particular, the Bank will comply with the requirements of the Bank Secrecy Act (12 USC 1951, 31 USC 5311, 31 CFR 1010, 31 CFR 1020) and Office of Foreign Assets Control (OFAC) regulations as set forth and amended from time to time in our Bank Secrecy Act Policy and Procedures and our Office of Foreign Assets Control Policy and Procedures. In general, domestic wires will be sent through the Fedwire system and the Bank will comply with Regulation J (12 CFR 210) and all other requirements/agreements required by the Federal Reserve (Fed) when using their system.

Since wire transfers present significant risk to the Bank, it is imperative that the following procedures be followed to protect the Bank from unnecessary losses. It shall be the responsibility of the Director of Operations to maintain this policy and update it as needed.

This service is available to customers only. Wire transfer requests can be made by both consumer and commercial customers either in person, by fax or email, or through the Cash Management module of the EasyLink on-line banking, provided specific security procedures are followed as outlined below. Requests by telephone will not be permitted.
The wire approval process will include three steps:

1) **Authorization** –
   a. Wire request form is accepted and reviewed for completeness;
   b. The customer's authority to request the wire is confirmed;
   c. The collected balance in the account is confirmed to be sufficient to cover the amount of the wire and fee.
2) **Verification** – The Verification step applies to all Easylink (online) wires $250,000 and over and all wires manually requested.
   a. The customer's identity and the wire request information is verified either in person or by a callback to a telephone number on file at the Bank on a recorded line and verification of a password;
3) **Approval** --
   a. Based upon the above authorization and verification, the wire is approved to be sent.

Only designated Bank Officers will have the authority to authorize, verify, and/or approve wire transfers. Authority levels will be established for those designated Officers and included in this policy as Appendix 1. Outgoing wires of amounts less than $100,000 may be authorized, verified, and approved by a single designated Bank Officer up to the amount of his/her approved limits.

For wires over $100,000 and up to $500,000, two designated Bank Officers are required to process a wire. One authorized individual must perform the "Authorization" function. A second individual must perform "Verification" and "Approval" within their approval authority limits. For wires over $500,000.00 three individuals must be involved. One must "Authorize," a second must "Verify," and a third must "Approve." In this case the individual approving the wire must have authority to approve the dollar amount of the wire.

Anyone involved in the wire transfer process must initial the form acknowledging they have performed specific duties.

All wire requests, other than those done through the Bank's online banking, must be documented on a Wire Request Transfer Form and signed by the customer making the request.

Customers who wish to send wires through online cash management and those who send an average of more than four (4) wires per month will be required to complete a Wire Transfer Agreement. As part of the Wire Transfer Agreement, customers authorized to request a wire will provide a password for identification purposes. The Wire Department will maintain the list of authorized requestors and their passwords to be accessed by the Bank Officers designated to authorize, verify, and approve wires. For customers without an agreement and PIN on file, if the identity of the customer can be verified to the fullest extent possible through a callback to the telephone number on file in the Bank's CIF records and the wire is otherwise approved following the steps listed previously, the wire may be approved.

WIRE INITIATION
IN PERSON
When a customer requests a wire transfer in person, a Wire Transfer Request Form should be completed and should include:

- Amount of Wire Transfer
- Customer name, address, and account number
- Customer identification, if customer is not known
- Beneficiary (receiving party) name, address, and account number
- Beneficiary's bank name, address, & routing number
- Any intermediary bank information if needed

Once the customer has signed the form, the wire approval process outlined above will be followed. No wire transfer will be transmitted without having been authorized, verified, and approved.

BY FAX OR EMAIL
Fax or email requests will only be accepted for customers who have signed a Wire Transfer Agreement and provided a user password to be used for verification of identity. The Wire Transfer Form should be completed and should include:

- Amount of Wire Transfer
- Customer name, address, and account number
- Customer identification, if customer is not known
- Beneficiary (receiving party) name, address, and account number
- Beneficiary's bank name, address, & routing number

- Any intermediary bank information if needed

Upon receipt of the signed Wire Transfer Form, the Bank Officer performing the Verification step will verify the signature and perform a telephone callback to a telephone number on file for the customer using a recorded telephone line as part of the verification step. The Bank Officer will ask for the customer's password and compare it to the password on file before signing off on the verification.

The wire approval processed as outlined above will be followed. No wire transfer will be transmitted without being authorized, verified, and approved.

BY EASYLINK (ONLINE BANKING)
Commercial clients who use EasyLink Cash Management will be assigned a wire limit based on average balance maintained and need. A Wire Transfer Agreement will be completed and signed, and all persons authorized to initiate wires on the account(s) will be assigned transfer limitations and dollar limits. All companies will be encouraged to send wire transfers using two parties, i.e. one to enter data, the other to approve. Limits which are out of the norm will require approval from Senior Management. All Cash Management clients will be required to use tokens for security purposes.

The EasyLink Wire Transfer information entered online should include:

- Amount of Wire Transfer
- Customer name, address, and account number
- Customer identification, if customer is not known
- Beneficiary (receiving party) name, address, and account number
- Beneficiary's bank name, address, & routing number
- Any intermediary bank information if needed

The Authorization step of the wire process is completed automatically through the system. If the wire request is $250,000 or over a designated Bank Officer will perform a telephone callback to a telephone number on file for the customer using a recorded telephone line as part of the verification step. The Bank Officer will ask for the customer's password and compare it to the password on file before signing off on the verification.

The wire approval processed as outlined above will be followed. No wire transfer will be transmitted without being authorized, verified, and approved.

DRAWDOWN REQUESTS (REVERSE WIRES)
In some situations, (payroll for example), a client may want to enter into an agreement with a third party to perform Drawdown Requests. In these cases the beneficiary of the wire requests through his bank that funds be sent to him from a Chain Bridge Bank accountholder. Drawdown Requests will be treated like outgoing wire requests and the same approval procedures will be followed. A wire agreement will be required and information about the expected drawdowns, such as the beneficiary, approximate amounts, expected frequency, etc. will be obtained from an authorized signer on the Wire Agreement. Upon receipt of a Drawdown Request, designated Bank Officers

will perform the Authorization, Verification, and Approval steps as they would for any outgoing wire. No Drawdown Request will be honored unless the approval process is complete.

BANK PURPOSE WIRES SENT TO OR FROM CORRESPONDENT BANKS

Wires for Bank purposes between Correspondent Banks may be initiated by Accounting Department personnel but must be approved by the Chief Financial Officer, the Chief Executive Officer, the Chief Credit Officer, or the Director of Operations. Approval may be given via email. All such wires must be sent by a predetermined template which only the Chief Financial Officer or the Chief Executive Officer may change or create.

Wire agreements and Authorization Forms and other documentation will be kept secure.

PROCESSING WIRE TRANSFERS

OUTGOING WIRES

No one person will have the responsibility of both entering and verifying a wire transfer request in the wire transfer systems. One employee will enter the wire information on the system; a second Employee will verify that the wire information is correct as entered and verify/send the wire.

The Deposit Operations area will send confirmations of outgoing wires to customers by secure email.

INCOMING WIRES

When wires are received into the Bank, the funds are deposited into the designated beneficiary's account and a notice will be sent to the customer by secure email. In compliance with UCC Article 4A-207, incoming wires will be posted by account number. If the Bank notices a discrepancy between the beneficiary account number and beneficiary name, the Bank reserves the right to return the wire although it is not obligated to do so. If there is any question as to the beneficiary's right to the funds, such as a discrepancy between name and account number, the wire will be returned.

RECORDKEEPING

Funds transfer personnel will comply with all recordkeeping requirements of 31 CFR 103.33 of the Bank Secrecy Act with regard to funds transfers in the amount of $3,000.00 or more.
Whenever the Bank accepts a wire transfer request in the amount of $3,000 as the originator's bank, the Bank will obtain and retain the original or other copy or electronic record of the following information relating to the wire transfer:

- Name and address of the originator
- Amount of the wire
- Execution date of the wire
- Any payment instructions
- Name of the beneficiary's bank

In addition, the Bank will retain as many as possible of the following items as received on the request;

- Name and address of the beneficiary
- Account number of the beneficiary
- Any other specific identifier of the beneficiary

For each incoming wire transfer the Bank accepts as the beneficiary's bank, the Bank will retain the original or other copy or electronic record of the payment order.

The Bank will keep the required information in such a fashion that it will be able to retrieve it when required.

Wire transfer requests are exempt from recordkeeping rules if the originator and beneficiary are one of the following:

- Domestic bank
- Wholly-owned domestic subsidiary of a domestic broker or dealer in securities
- United States
- State or local government or government agency
- Nonbank financial institution

OFAC

Chain Bridge Bank, N.A. is committed to complying with all the rules and regulations set forth in the U.S. Economic Sanctions Regulations. Wire transfer personnel will have access to lists of countries and entities with which the Bank may not do business and will refer to such lists whenever sending or receiving foreign funds. The lists are available at the Office of Foreign Assets Control (OFAC)'s web site http://www.treas.gov/offices/enforcement/ofac/sdn.

All wires entered into Jack Henry's 20/20 system undergo a search through OFAC automatically. Should a possible match occur, the Bank's processor will determine its validity. In the event of an exact match, the Bank's BSA Officer will be notified, and the wire will not be sent until or unless permission is obtained to do so from OFAC officials. OFAC reports are also reviewed the following day by the BSA Officer to ensure compliance.

SECURITY & INTERNAL CONTROLS

Chain Bridge Bank, N.A. utilizes three online services for transmitting and receiving wires -- Jack Henry's DirectLine Wire system within the SilverLake Core which transmits through FedLine, CBLink (Community Bankers Bank), and PCBB (Pacific Coast Bankers Bank). FedLine Advantage will be used as a backup system in the event DirectLine Wires is inoperable.

SilverLake Core and DirectLine Wires

To access the SilverLake system, a user must be enter a user name and password. The Bank has assigned a System Administrator and assistant to administer permissions to the SilverLake global security system. Only those employees involved in the wire process have permission to access the Wires menu to enter and process wires. Two persons are involved in transmitting all outgoing wires.

FedLine Advantage

FedLine Advantage is a service provided by the Federal Reserve Bank (FRB) for secure data transmission for transmitting and receiving domestic wires. Because of the sensitivity of the information being transmitted, FedLine Advantage requires adherence to strict guidelines for the installation of electronic equipment needed for the service and maintenance of the security of the data connection, as outlined in Operating Circular 5 "Electronic Access" dated March 15, 2006.

End User Authorization Contacts

The Bank has identified two (2) bank employees to act as End User Authorization Contacts (EUACs). Notification of the designated employees and any subsequent changes will be made in writing to the Federal Reserve Bank by an authorized representative.

The EUACs are solely responsible for the identification, authentication, and notification processes between the FRB and the Bank's Users. The EUAC will submit a request to the FRB for all new Users, authorizing access to appropriate business applications. Authorization will be limited to only those employees who are needed to initiate or verify wires and those who process check adjustments. The EUACs will also maintain confidentiality of any part of the credentials they are given to pass on to a User.

It is the responsibility of the EUAC to notify the FRB prior to (or, if possible, immediately after) the occurrence of any of the following events:

- A Bank User's employment with the Bank is terminated;
- A User no longer requires or is no longer authorized to have access to one or more FRB business applications;
- The User knows or suspects that his or her passwords have been compromised.

The EUAC must notify the FRB immediately following the occurrence of any of the following:

- The EUAC has not received passwords/credentials from the FRB within ten (10) business days of the submission of the Subscriber Request;
- The Bank User has not received passwords/credentials from the FRB within ten (10) business days of the submission of the Subscriber Request;
- The EUAC or the User receives passwords/credentials that display evidence of tampering;
- The User attempts to use the credentials but is unable to access an authorized FRB business application.

User Responsibilities
Users are responsible for:

- Maintaining the confidentiality of their passwords/credentials;
- Selecting strong passwords;
- Securing their FedLine Security token in a locked place overnight and when not in use;
- Notifying the EUAC if passwords/credentials have not arrived when expected;
- Notifying the EUAC if they know or suspect their passwords/credentials have been compromised or their FedLine Security token is misplaced;
- Notifying the EUAC if they are unable to access an application that they are authorized to access.

CBLink (Community Bankers Bank)

Access to CBLink is protected by the use of a certificate and a biometric device, which is inserted in a USB port of the User's computer and records the User's fingerprint. The use of the biometric device precludes the need for password credentials and is specific to the assigned User. Only the Network Administrator and the Director of Operations are authorized to install certificates and biometric devices for designated Users. They are also authorized to establish permission levels for Users. In no case may a User be permitted to enter and verify the same wire; dual entry is required.

Users are responsible for notifying the Network Administrator or the Director of Operations if their biometric device is lost or stolen.

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Pacific Coast Bankers Bank (PCBB)

Access to PCBB is protected by the use of a certificate and a password. Only an Administrator can establish or change permission levels for Users. In no case may a User be permitted to enter and verify the same wire; dual entry is required.

CONTINGENCY PLAN

If wires cannot be transmitted through either SilverLake DirectLine Wires, CBB Link, PCBB, or FedLine Advantage certain employees have been designated to initiate and verify wires as well as accept incoming wire information offline through the Federal Reserve. Fed codes, required for offline initiations, are locked in a secure file cabinet.