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October 6, 2025

By Email

Sebastian R. Astrada
Director for Licensing
Midsize, Trust, Credit Card, and Novel Banks
Office of the Comptroller of the Currency
400 7th St., SW
Washington, D.C. 20219

Re: Application of Sony Bank Incorporated to Establish a National Trust Bank and Commence Certain Activities Involving Cryptocurrency

Dear Director Astrada,

Sony Bank Incorporated (“Sony Bank”), a Japanese commercial bank, as sponsor and acting through the organizers named herein, respectfully requests the approval of the Office of the Comptroller of the Currency (“OCC”) to organize Connectia Trust, National Association as a *de novo* national bank, the operations of which are limited to those of a trust company and activities related thereto (such an institution, a “trust bank”), as set forth in this application (the “Application”), and thereafter, to allow Connectia Trust, National Association to engage in certain specified activities involving cryptocurrency (together, the “Cryptocurrency Activities”).

This letter, the attached application form, and the enclosed materials comprise Sony Bank’s application to establish a trust bank and for such institution to engage in the Cryptocurrency Activities. These materials include a public application (“Public Application”) and a confidential exhibits volume (“Confidential Exhibits”). The Public Application is comprised of this letter, the OCC’s application form, an index of all materials included as part of this application, and certain public exhibits. The Confidential Exhibits are comprised of certain materials for which confidential treatment is requested.

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Certain Activities Involving Cryptocurrency

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Sony Bank requests confidential treatment for the attached Confidential Exhibits to this application pursuant to the Freedom of Information Act (“FOIA”), 5 U.S.C. § 552(b), and the OCC’s implementing regulations thereunder, 12 C.F.R. Part 4, Subpart B, on the grounds that they contain information regarding (i) Sony Bank’s and its affiliates’ businesses and operations that have not previously been disclosed to the public and (ii) other nonpublic information regarding the terms of the Application and the Cryptocurrency Activities. The disclosure of such information would be likely to cause Sony Bank and its affiliates substantial competitive harm. Confidential treatment is therefore warranted pursuant to 5 U.S.C. §§ 552(b)(4), and 12 C.F.R. §§ 4.12(b)(4). In the event of a third party FOIA request, we respectfully request notice of such request, as well as a reasonable period of time to respond prior to any anticipated release of material by the OCC.

Thank you for your consideration of this application. Please feel free to contact me at dteitelbaum@sidley.com, or 202-736-8683 with any questions.

Very truly yours,

/s/ David E. Teitelbaum

David E. Teitelbaum

cc: Takafumi Watanabe, Sony Bank Incorporated
Takahito Yamada, Sony Bank Incorporated
Matthew Katz, Sidley Austin LLP
Jordyn Singer, Sidley Austin LLP

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INTERAGENCY CHARTER AND FEDERAL DEPOSIT INSURANCE APPLICATION

Public reporting burden for this collection of information is estimated to average 250 hours per response (125 hours for the charter application and 125 hours for the insurance application), including the time to review instructions, search, and to review and complete the information collection. Send comments regarding this burden estimate or any other aspect of this collection of information, including suggestions for reducing this burden to: Office of the Executive Secretary, Federal Deposit Insurance Corporation, 550 17th Street, NW, Washington, DC 20429; or Licensing Activities Division, Comptroller of the Currency, 400 7th Street, SW, Washington, DC 20219; and to the Office of Management and Budget, Paperwork Reduction Project, Washington, DC 20503.

An organization or a person is not required to respond to a collection of information unless it displays a currently valid OMB control number.

GENERAL INFORMATION AND INSTRUCTIONS

Preparation and Use

This application is used to effect a transaction under:

- Sections 5 and 6 of the Federal Deposit Insurance Act (FDIA), as amended (12 U.S.C.1815, 1816), for federal deposit insurance.
- Section 5(e) of the Home Owners' Loan Act (HOLA), as amended (12 U.S.C.1464(e)), for a federal savings association charter.
- The National Bank Act, as amended (12 U.S.C. 21 *et seq.*), for a national bank charter.
- The state law for applying for state depository charters, as approved by state regulatory authorities.

All questions must be answered with complete and accurate information that is subject to verification. If the answer is "none," "not applicable," or "unknown," so state. Answers of "unknown" should be explained.

The questions in the application are not intended to limit the Applicant's presentation nor are the questions intended to duplicate information supplied on another form or in an exhibit. For such information, a cross reference to the information is acceptable. *Any such cross-reference must be made to a specific cite or location in the documents, so the information can be located easily.* Supporting information for all relevant factors, setting forth the basis for Applicant's conclusions, should accompany the application. The regulatory agency may request additional information.

This application form collects information that the regulatory agencies will need to evaluate a charter or insurance application. While most of the information will be available when the organizers submit the application, some information will not be available at that time. Each agency has specific purposes and different timing requirements in collecting some of this information; for example, receipt of the organizers' draft policies. For any question about when to submit a specific item, organizers should contact the appropriate regulatory agencies to discuss the specific timing for submission.

The regulatory agency must consider the applicable statutory requirements set forth in the preceding provisions, as well as applicable regulatory requirements, when acting on this application. For additional information regarding these statutory and regulatory requirements, as well as processing procedures and guidelines and any supplemental information that may be required, please refer to the appropriate regulatory agency's procedural guidelines [i.e., *Comptroller's Corporate Manual*, the FDIC's Rules and Regulations (12 C.F.R. 303) and Statement of Policy on "Applications for Deposit Insurance", or the application guidelines for the state in which the Applicant seeks a state charter]. The Applicant may contact the agency directly for specific instruction or visit their websites at www.fdic.gov, www.occ.treas.gov, and www.csbs.org (through "Links" to each state banking department).

Notice of Publication

The Applicant must publish notice of the proposed organization in a newspaper of general circulation in the community or communities in which the proposed financial institution will be located. Contact the appropriate regulatory agency for the specific requirements of the notice of publication.

Electronic Submission

In addition to an original application and the appropriate number of signed copies, the regulatory agencies would like to have an electronic copy of the information in the application, especially of the business plan's financial projections. Submission of an electronic copy is voluntary. It will be used only for internal review and processing and will not be released to the public. The electronic copy may be provided on a computer diskette, using common word processing and spreadsheet software. For E-mail submissions, contact the appropriate regulatory agency for instructions and information about secure transmission of confidential material.

Confidentiality

Any Applicant desiring confidential treatment of specific portions of the application must submit a request in writing with the application. The request must discuss the justification for the requested treatment. The Applicant's reasons for requesting confidentiality should specifically demonstrate the harm (for example, loss of competitive position, invasion of privacy) that would result from public release of information (5 U.S.C. 552 or relevant state law). Information for which confidential treatment is requested should be: (1) specifically identified in the public portion of the application (by reference to the confidential section); (2) separately bound; and (3) labeled "Confidential." The Applicant should follow the same procedure when requesting confidential treatment for the subsequent filing of supplemental information to the application.

The Applicant should contact the appropriate regulatory agency for specific instructions regarding requests for confidential treatment. The appropriate regulatory agency will determine whether the information will be treated as confidential and will advise the Applicant of any decision to publicly release information labeled as "Confidential."

INTERAGENCY CHARTER AND FEDERAL DEPOSIT INSURANCE APPLICATION

(Check all appropriate boxes.)

Type of Charter

- ☒ National Bank
☐ State Bank
☐ Federal Savings Bank or Association
☐ State Savings Association
☐ Other

Special Focus

- ☐ Community Development
☐ Cash Management
☒ Trust
☐ Bankers' Bank
☐ Credit Card ☐ Non-CEBA ☐ CEBA
☐ Other

For OCC: ☒ Standard ☐ Expedited

Chartering Agency

- ☒ Comptroller of the Currency
☐ State

Type of Insurance Application

- ☐ De Novo
☐ Operating Noninsured Institution
☐ Other

Federal Reserve Status

- ☐ Member Bank
☐ Nonmember Bank

Proposed Depository Institution (institution)

Name
Street City State Zip

Holding Company Identifying Information (if applicable)

Name
Street City State Zip

Contact Person

Name
Title/Employer
Street City State Zip
Phone # Fax # E-mail Address

Application of Sony Bank Incorporated to Establish a National Trust Bank and Commence Certain Activities Involving Cryptocurrency

1. Overview

- (a) **Provide a brief overview of the application. The overview should describe the institution's business and any special market niche, including the products, market, services, and any nontraditional activities.**

Sony Bank Incorporated ("Sony Bank"), a Japanese commercial bank, as sponsor and acting through the organizers named herein, requests approval from the Office of the Comptroller of the Currency ("OCC") to organize Connectia Trust, National Association ("Trust Bank") as a *de novo* national bank, the operations of which are limited to those of a trust company and activities related thereto, as set forth in this application (the "Application"). Trust Bank will be headquartered in New York, New York and will be a wholly owned subsidiary of Sony Bank, which is itself a wholly owned subsidiary of Sony Financial Group Inc. ("SFG"), a publicly traded Japanese financial services holding company. Please see Confidential Exhibit 1(a) for additional information related to SFG and its ownership structure.

During its initial phase of operations, Trust Bank intends to engage in certain digital asset activities that the OCC has previously found to be permissible under existing national bank legal authorities. These include the issuance of dollar-pegged stablecoins and maintenance of corresponding reserve assets, the provision of non-fiduciary digital asset custody services, and the provision of asset management services as fiduciary to certain affiliates. For additional information regarding these initial activities and Trust Bank's planned business evolution over its first several years, please see Section III of Trust Bank's confidential business plan (the "Confidential Business Plan"), provided as Confidential Exhibit 1(f).

- (b) **Describe any issues about the permissibility of the proposal with regard to applicable state or federal laws or regulations. Identify any regulatory waiver requests and provide adequate justification.**

This Application is made pursuant to 12 U.S.C. §§ 21, 24(*Seventh*) and 12 C.F.R. § 5.20. Trust Bank will limit its operations to those of a trust company and activities related thereto. As such, while Trust Bank will not take deposits nor seek deposit insurance, it will engage in the business of banking and activities incidental to the business of banking permissible for a national bank under 12 U.S.C. § 24(*Seventh*) and fiduciary activities permissible under 12 U.S.C. § 92(a). For additional information on the permissibility of the proposed activities of Trust Bank under applicable federal and state law, please see the Permissibility Analysis memorandum, provided as Confidential Exhibit 1(b)(i).

We have identified no issues regarding the permissibility of the proposal with regard to applicable state or federal laws or regulations.

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Waivers of the Citizenship and Residency Requirements of 12 U.S.C. § 72

Trust Bank is seeking waivers of the citizenship requirements applicable to directors of a national bank for two of the five proposed members of the Board of Directors. Pursuant to 12 C.F.R. § 5.43(c)(2), a national bank may request a waiver of the citizenship requirement for individuals comprising up to a minority of the proposed national bank's board of directors by filing a written application with the OCC.

Trust Bank is also seeking waivers of the residency requirements applicable to directors of a national bank for four of the five proposed members of the Board of Directors. Pursuant to 12 C.F.R. § 5.43(c)(1), a national bank may request a waiver of the residency requirements for any number of directors by filing a written application with the OCC.

Please see Section 2(b), below, for a description of the professional qualifications of the proposed members of the Board of Directors of Trust Bank. Citizenship Waiver Requests and Residency Waiver Requests will be provided under separate confidential cover to the OCC. Please see Confidential Exhibit 1(b)(ii) for additional information and justifications for such requests.

- (c) **List and provide a copy of all applications filed in conjunction with this proposal, such as applications for holding company, trust powers, branch offices, service corporations, and other subsidiaries.**

Trust Bank is requesting full fiduciary powers from the OCC. Pursuant to 12 C.F.R. § 5.20(h)(7), Trust Bank is required to provide all information required by 12 C.F.R. § 5.26 in connection with such request, but is not required to submit a separate application for fiduciary powers. For ease of reference, this information (which is otherwise generally included as a part of this Application) is provided in a consolidated location in Public Exhibit 1(c).

- (d) **When available, provide a copy of all public or private offering materials and the proposed form of stock certificate, including any required restrictive legends.**

There will not be public or private offering materials. Please see Confidential Exhibit 1(d) for information regarding the manner of issuance of Trust Bank shares.

- (e) **Provide a copy of the proposed articles of association, articles of incorporation, or charter, and proposed bylaws.**

Copies of the proposed articles of association and proposed bylaws are provided as Confidential Exhibits 1(e)(i) and 1(e)(ii), respectively. A copy of the proposed form of organization certificate is provided as Confidential Exhibit 1(e)(iii).

- (f) **Provide a copy of the business plan. The business plan should address, at a minimum, the topics contained in the appropriate regulatory agency's Business Plan Guidelines.**

Application of Sony Bank Incorporated to Establish a National Trust Bank and Commence Certain Activities Involving Cryptocurrency

Trust Bank's Confidential Business Plan is provided as Confidential Exhibit 1(f).

2. Management

- (a) **Provide a list of the organizers, proposed directors, senior executive officers, and any individual, or group of proposed shareholders acting in concert, that will own or control 10 percent or more of the institution's stock. For each person listed, attach an Interagency Biographical and Financial Report, a fingerprint card, and indicate all positions and offices currently held or to be held with the institution's holding company and its affiliates, if applicable. Include the signed "Oath of Director" for each proposed director. For an FSA filing, provide a RB 20a Certification for each person listed.**

The organizers of Trust Bank are:

Name	Current Employment
Takahito Yamada	Head of Web3 Strategy, Sony Bank
Takafumi Watanabe	Chief Financial Officer, Sony Bank
Shugo Kimura	Senior Manager, Web3 Strategy, Sony Bank
Yutoku Minanogawa	Vice President, Privacy Technology & Operations, Sony Pictures Entertainment
Nida Davis	Director of Security Architecture, Microsoft Corporation

Trust Bank will have a five-member Board of Directors. As required by 12 U.S.C. § 72 and 12 C.F.R. § 7.2005, each director will own common stock of SFG with an aggregate par, fair market, or equity value of at least \$1,000, or equivalent amounts of other instruments of SFG. With respect to such other instruments, as further described in Confidential Exhibit 2(a)(i), Sony Bank respectfully requests that the OCC determine such instruments to constitute a qualifying equity interest in a company that has control of a national bank. The proposed directors of Trust Bank are:

Name	Employment While Serving as Director
Takahito Yamada	CEO/COO, Trust Bank
Takafumi Watanabe	Chief Financial Officer, Sony Bank
Nida Davis	Director of Security Architecture, Microsoft Corporation
David Forman	Regulatory Affairs Consultant, Self-Employed
Jeffrey Levine	Retired

Trust Bank's proposed senior executive officers are:

Name	Trust Bank Title
Takahito Yamada	Chief Executive Officer/Chief Operating Officer
Shugo Kimura	Chief Compliance Officer/Chief Risk Officer
Yutoku Minanogawa	Chief Information Security Officer/Chief Technology Officer

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A full internal Trust Bank organizational chart is included in Section IV.B of the Confidential Business Plan, provided as Confidential Exhibit 1(f). The responsibilities of a Chief Financial Officer will be performed by the CEO until such time as the board concludes that the burdens of the position require independent hiring for the two roles.

Copies of the Interagency Biographical and Financial Reports and other supporting materials, where applicable, for each proposed director and senior executive officer will be provided under separate confidential cover to the OCC.

A copy of the Joint Oath of Bank Directors is provided as part of Confidential Exhibit 2(a)(ii) and an executed version (or equivalent Individual Oath of Bank Director forms), will be provided under separate cover to the OCC later in the Trust Bank organization process.

Trust Bank's sole shareholder will be Sony Bank, which is a wholly owned subsidiary of SFG. Please see Confidential Exhibit 2(a)(iii) for additional information related to Trust Bank's ownership structure. Please also see Confidential Exhibit 2(a)(iv) for a copy of the Corporate Biographical and Financial Report for SFG, as well as Confidential Exhibit 2(a)(v) for certain relevant financial information of Sony Bank parent entities, and Confidential Exhibit 2(a)(vi) for information regarding SFG's governance and authorization procedures.

- (b) **Describe each proposed director's qualifications and experience to serve and oversee management's implementation of the business plan. Describe the extent, if any, to which directors or major stockholders are or will be involved in the day-to-day management of the institution. Also list the forms of compensation, if any.**

The director nominees for Trust Bank collectively bring extensive knowledge and practical experience in the financial services field, having previous professional involvement with banking operations, regulatory compliance, information technology and cybersecurity, and emerging Web3 and blockchain technologies. Further information outlining their credentials and professional backgrounds can be found in their Interagency Background and Financial Reports, which will be submitted under separate cover to the OCC on a confidential basis.

Inside Directors:

1. Takahito Yamada: Takahito Yamada will be Trust Bank's Chief Executive Officer (and Chief Operating Officer), and will serve on the Board of Directors of Trust Bank. Mr. Yamada is currently the head of Web3 Strategy at Sony Bank. In that role, he spearheads the planning and implementation of innovative Web3 finance business strategies. During the two-and-a-half years prior to joining Sony Bank, Mr. Yamada served first as Head of Business Planning at Rakuten Bank, overseeing the bank's business planning and execution, followed by serving as Director of International Financial Markets at Japan's Financial Services Agency. Prior to holding those roles, he worked at the Bank of Japan for more than twenty-five years, focusing on bank regulation. In that capacity, he was also a member of

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various task forces within the Basel Committee on Banking Supervision, and led workstreams focused on managing emerging technology risks and enhancing operational resilience at the Financial Stability Board. He is also a Certified Anti-Money Laundering Specialist (CAMS).

2. Takafumi Watanabe: Takafumi Watanabe is a Senior Managing Director and the current Chief Financial Officer of Sony Bank. In his role as Chief Financial Officer, he leads corporate planning and new business initiatives related to Web3 finance. Prior to joining Sony Bank, Mr. Watanabe spent over twenty-five years at MUFG Bank, most recently serving as Managing Director of the Affiliated Company Management Office. During his time at MUFG Bank, he worked at both domestic and overseas branches and was engaged in transactions for large companies in the bank's head office. Additionally, during his tenure at MUFG Bank, he also helped launch a new global payments department within the bank and managed the operations for MUFG's domestic affiliated companies.

Independent Directors:

1. Nida Davis: Dr. Nida Davis has over 15 years of experience implementing cybersecurity and information security strategies, as well as developing technology and operational risk management programs. Dr. Davis is currently the Security Architecture Director at Microsoft, a position she has held since April 2022. In this role, she leads corporate initiatives aimed at enhancing the company's security posture through innovative strategies in Zero Trust and Cloud Security architectures. Prior to joining Microsoft, Dr. Davis served as the Associate Director of Cyber and Operational Resilience and the Associate Director/Banking Supervision Chief Technology Officer at the Board of Governors of the Federal Reserve System. In her role as Associate Director of Cyber and Operational Resilience, she set priorities for and directed the strategic implementation of cybersecurity and operational resilience policies, rules, guidance, and standards for the banking sector. Dr. Davis earned her B.S. in Chemical Engineering from Jordan University, an M.B.A. from the American University in Cairo, and a D.L.S. from Georgetown University.
2. David Forman: David Forman has over 30 years of experience in securities law and financial services regulation. He most recently served as General Counsel at EDX Markets, an institutional cryptocurrency exchange and clearinghouse, from 2022 to 2025. Previously, he held various senior leadership roles at Fidelity Investments over a 22 year period, including Chief Legal Officer of Fidelity Brokerage Services, where he managed legal strategy for Fidelity's brokerage business and Fidelity's life insurance company, and General Counsel of Fidelity Digital Asset Services, where he was responsible for legal strategy for Fidelity's cryptocurrency and blockchain business from its inception. During his time at Fidelity Investments, he also served as the legal member of Fidelity's Cryptocurrency/Blockchain Steering Committee. Mr. Forman began his career in securities litigation, including as a partner at Hutchins, Wheeler & Dittmar. He earned his J.D. from Boston University School of Law and his B.A. from Colgate

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University, and is admitted to the bars of New York, New Jersey, and Massachusetts.

3. Jeffrey Levine: Jeffrey Levine has over 30 years of experience in legal, risk, and compliance in the financial services industry. He most recently served as Senior Vice President and Chief Global Product, Credit, Marketing & Regulatory Counsel at PayPal from 2021 to 2025, where he was deputy to the General Counsel and senior advisor to the C-suite. During his tenure at PayPal, which began in 2014, he oversaw a global team of more than 120 attorneys, managed worldwide regulatory exams, and negotiated strategic relationships with banks and payment networks. Previously, he was a Partner at Hudson Cook, where he focused on consumer financial protection and fair lending laws, and spent two decades at JPMorgan Chase Bank, where he served as Senior Vice President and General Counsel of Chase Auto Finance and Student Loans and as President of its Student Loan division. He began his career as a tax associate at Weil, Gotshal & Manges. Mr. Levine earned his J.D. from St. John's University School of Law and his B.A. in Marketing from Long Island University, and is admitted to the New York bar.

One director, Takahito Yamada, will be involved in the day-to-day management of Trust Bank, in his capacity as the CEO/COO thereof.

Trust Bank intends to compensate its directors in a manner generally consistent with market standards for other national trust banks, state-chartered limited purpose trust companies, and other licensed entities operating in the digital assets space. For additional information regarding director compensation, please see Confidential Exhibit 2(b).

(c) **Provide a list of board committees and members.**

Trust Bank anticipates having two committees of the Board of Directors: an Audit Committee and an Investment Committee.

1. Audit Committee: The Audit Committee will be responsible for overseeing the integrity of Trust Bank's financial reporting, internal controls, and audit processes. It will appoint and supervise the performance of the Trust Bank's external auditors in connection with the general auditing of the institution's activities and the maintenance of reserves supporting the proposed stablecoin in particular. The members of the Audit Committee will also perform the functions of Trust Bank's Fiduciary Audit Committee. In such capacity, the members of the Audit Committee will appoint and oversee external auditors responsible for Trust Bank's auditing of fiduciary activities, or the adoption of a continuous audit system in compliance with applicable regulations. The Audit Committee will be composed of Nida Davis and Jeffrey Levine, and Mr. Levine will serve as the committee chair. No inside directors will serve on the committee.
2. Trust & Investment Committee: The Trust & Investment Committee will be comprised of Takahito Yamada, Takafumi Watanabe, and David Forman. Mr.

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Watanabe will serve as the committee chair. The Trust & Investment Committee will oversee Trust Bank's general asset management and investment activities, along with its trust-specific investment functions, to ensure that such operations are conducted in a safe and sound manner and in compliance with applicable law.

Please see Confidential Exhibit 2(c) for additional information.

(d) Describe any plans to provide ongoing director education or training.

Trust Bank will implement a comprehensive director training program to ensure that its directors are equipped with the knowledge and expertise necessary to provide effective oversight of the bank and its operations. Leveraging advice from its parent company, Sony Bank, which maintains a robust framework for education and training, Trust Bank will develop and tailor its own training program to address the specific needs of its governance structure and business model. Newly appointed independent directors will participate in an introductory training that introduces the core aspects of Trust Bank's business strategy, organizational structure, and risk management framework. In addition, periodic trainings will also be conducted during the Board of Directors meetings. These periodic trainings will focus on emerging legal, regulatory, compliance, and risk-related developments relevant to Trust Bank's operations. Finally, Trust Bank will also provide refresher trainings to directors on important topics originally covered in other training sessions at appropriate intervals.

(e) Describe each proposed senior executive officer's duties and responsibilities and qualifications and experience to serve in his/her position. If a person has not yet been selected for a key position, list the criteria that will be required in the selection process. Discuss the proposed terms of employment, including compensation and benefits, and attach a copy of all pertinent documents, including an employment contract or compensation arrangement. Provide the aggregate compensation of all officers.

Information regarding the duties and responsibilities of each proposed senior executive officer of Trust Bank may be found in Section IV.B of Trust Bank's Confidential Business Plan, provided as Confidential Exhibit 1(f).

Please see our response to Question 2(a), above, for a list of the individuals that will serve as senior executive officers of Trust Bank, along with their qualifications and experience to serve in such roles.¹ Additional information regarding these individuals may be found in their Interagency Biographical and Financial Reports, which will be provided under separate cover to the OCC on a confidential basis.

Supplemental information regarding the senior executive officers of Trust Bank, as well as information regarding their proposed terms of employment, benefits and aggregate compensation may be found in Confidential Exhibit 2(e).

¹ The COO is intended to serve as the bank's Trust Officer with respect to the fiduciary activities of the bank.

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- (f) **Describe any potential management interlocking relationships (12 U.S.C. 1467a(h)(2), 3201-3208, or applicable state law) that could occur with the establishment or ownership of the institution. Include a discussion of the permissibility of the interlock with regard to relevant law and regulations or include a request for an exemption.**

The organizers are not aware of any potential interlocking relationships that would be prohibited by the Depository Institutions Management Interlocks Act (“DIMIA”). Out of an abundance of caution, we note that Takafumi Watanabe will continue to serve in his role as Senior Managing Director and Chief Financial Officer of Sony Bank while serving on the Board of Directors of Trust Bank. However, this employment relationship would not constitute an interlock within the meaning of the DIMIA. As such, no exemptions are presently needed.

- (g) **Describe any potential conflicts of interest.**

Please see Confidential Exhibit 2(g) for information on Trust Bank’s considerations related to potential conflicts of interest.

- (h) **Describe any transaction, contract, professional fees, or any other type of business relationship involving the institution, the holding company, and its affiliates (if applicable), and any organizer, director, senior executive officer, shareholder owning or controlling 10 percent or more, and other insiders. Include professional services or goods with respect to organizational expenses and bank premises and fixed asset transactions. (Transactions between affiliates of the holding company that do not involve the institution need not be described).**

- (1) **State whether the business relationship is made in the ordinary course of business, is made on substantially the same terms as those prevailing at the time for comparable transactions with non-insiders, and does not present more than the normal risk of such transaction or present other unfavorable features.**
- (2) **Specify those organizers that approved each transaction and whether the transaction was disclosed to proposed directors and prospective shareholders.**
- (3) **Provide all relevant documentation, including contracts, independent appraisals, market valuations, and comparisons.**

It is not currently contemplated that Trust Bank will enter into any transactions or contracts with insiders, except in the following limited circumstances: (a) as part of their employment agreements and any incentive plans, or (b) as part of ordinary-course banking relationships as with any member of the public seeking to utilize Trust Bank’s services (and therefore conducted on arm’s-length, fair market terms), such as the provision of custody or other digital asset services by Trust Bank to such individuals. Any transaction by Trust Bank and an insider will be conducted in full compliance with applicable laws and regulations.

Application of Sony Bank Incorporated to Establish a National Trust Bank and Commence Certain Activities Involving Cryptocurrency

- (i) **Describe all stock benefit plans of the institution and holding company, including stock options, stock warrants, and other similar stock-based compensation plans, for senior executive officers, organizers, directors, and other insiders. Include in the description**
 - (1) **The duration limits.**
 - (2) **The vesting requirements.**
 - (3) **Transferability restrictions.**
 - (4) **Exercise price requirements.**
 - (5) **Rights upon termination.**
 - (6) **Any “exercise of forfeiture” clause.**
 - (7) **Number of shares to be issued or covered by the plans.**
 - (8) **Provide a list of participants, allocation of benefits to each participant, and a copy of each proposed plan. (Plans must conform to applicable regulatory guidelines.)**

For information regarding the availability of stock-based compensation plans, please see Confidential Exhibit 2(i).

3. Capital

- (a) **For each class of stock, provide the number of authorized shares, the number of shares to be issued, par value, voting rights, convertibility features, liquidation rights, and the projected sales price per share. Indicate the amount of net proceeds to be allocated to common stock, paid-in surplus, and other capital segregations.**

Trust Bank will have a single class of common stock. For further information related to Trust Bank’s capital structure, please see the draft articles of association and proposed form of organization certificate, provided as Confidential Exhibits 1(e)(i) and 1(e)(iii), respectively. Please also see Section VI.A of the Confidential Business Plan, provided as Confidential Exhibit 1(f).

- (b) **Describe any noncash contributions to capital, and provide supporting documents for assigned values, including an independent evaluation or appraisal.**

It is not contemplated that Trust Bank will receive any noncash contributions to capital.

- (c) **Discuss the adequacy of the proposed capital structure relative to internal and external risks, planned operational and financial assumptions, including technology, branching, and projected organization and operating expenses. Present a thorough**

Application of Sony Bank Incorporated to Establish a National Trust Bank and Commence Certain Activities Involving Cryptocurrency

justification to support the proposed capital, including any off-balance-sheet activities contemplated. Describe any plans for the payment of dividends.

For information on Trust Bank's proposed capital structure, please refer to Sections VI.A.4 and VI.A.7 of the Confidential Business Plan and Schedule VI.A.4 thereto, provided as Confidential Exhibit 1(f). Please also see Confidential Exhibit 3(c) for a request relating to the capital structure of Trust Bank.

Trust Bank will not pay dividends during its first three years of operations. To the extent that dividends are contemplated thereafter, Trust Bank will pay dividends in compliance with applicable law and best practices for trust banks.

- (d) **List all known subscribers to stock. For organizers, directors, 10 percent shareholders, senior executive officers, and other insiders, include the number of shares and anticipated investment and the amount of direct and indirect borrowings to finance the investment. Discuss how any debt will be serviced.**

Trust Bank's sole shareholder will be Sony Bank. There will be no direct or indirect borrowings to finance Sony Bank's investment in Trust Bank.

- (e) **List recipients and amounts of any fees, commissions, or other considerations in connection with the sale of stock.**

No party will receive any fee, commission, or other consideration in connection with the issuance of Trust Bank's common stock to Sony Bank.

- (f) **Indicate whether the institution plans to file for S Corporation tax status.**

Trust Bank does not plan to file for S Corporation tax status.

4. Convenience and Needs of the Community

NOTE: This information must be consistent with the proposed business plan.

- (a) **Market Characteristics**

- (1) **Define the intended geographical market area(s). Include a map of the market area, pinpointing the location of proposed bank's offices and offices of competing depository institutions.**

The main office of Trust Bank will be located in New York, New York, but it plans to digitally offer its services throughout the entire U.S. Please see Section III.B.1 of the Confidential Business Plan, provided as Confidential Exhibit 1(f), for additional details. Please also see Public Exhibit 4(a) for a copy of the proposed form of newspaper notice that will be published in the New York market with respect to the filing of this Application.

Application of Sony Bank Incorporated to Establish a National Trust Bank and Commence Certain Activities Involving Cryptocurrency

- (2) **Describe the competitive factors the institution faces in the proposed market and how the institution will address the convenience and needs of that market to maintain its long-term viability.**

Please see Section III.D of the Confidential Business Plan, provided as Confidential Exhibit 1(f).

- (3) **Discuss the economic environment and the need for the institution in terms of population trends, income, and industry and house patterns.**

Please see Section III.C.3 of the Confidential Business Plan, provided as Confidential Exhibit 1(f).

(b) **Community Reinvestment Act (CRA) Plan**

NOTE: The CRA Plan must be bound separately.

- (1) **Identify the assessment area(a) according to the CRA regulations.**

Not applicable. As a national trust bank, Trust Bank will be a special purpose bank that does not perform commercial or retail banking services by granting credit to the public in the ordinary course of business. It therefore is not subject to the requirements of the CRA. *See* 12 C.F.R. § 25.11(c)(3).

- (2) **Summarize the performance context for the institution based on the factors discussed in the CRA regulations.**

Not applicable.

- (3) **Summarize the credit needs of the institution's proposed assessment area(s).**

Not applicable.

- (4) **Identify the CRA evaluation test under which the institution proposes to be assessed.**

Not applicable.

- (5) **Discuss the institution's programs, products, and activities that will help meet the existing or anticipated needs of its community(ies) under the applicable criteria of the CRA regulation, including the needs of low- and moderate income geographies and individuals.**

Not applicable.

5. Premises and Fixed Assets

Application of Sony Bank Incorporated to Establish a National Trust Bank and Commence Certain Activities Involving Cryptocurrency

- (a) **Provide a physical description for permanent premises and discuss whether they will be publicly and handicapped accessible. Indicate the level and type of property insurance to be carried.**

Please see Confidential Exhibit 5(a) for information regarding the bank's permanent premises and the level and type of property insurance to be carried in connection therewith.

- (b) **If the permanent premises are to be purchased, provide name of seller, purchase price, cost and description of necessary repairs and alterations, and annual depreciation. If the premises are to be constructed, provide the name of the seller, the cost of the land, and the construction costs. Indicate the percentage of the building that will be occupied by the bank. Provide a copy of the appraisal.**

Not applicable. Trust Bank will lease space, and will not purchase and/or construct its own premises.

- (c) **If the permanent premises are to be leased, provide name of owner, terms of the lease, and cost and description of leasehold improvements. Provide a copy of the proposed lease when available.**

Trust Bank will be located in segregated, subleased office space, at the address provided in response to Question 5(a) above. A copy of the form of proposed lease agreement, along with additional information related thereto, is attached as part of Confidential Exhibit 5(c).

Trust Bank does not anticipate making any significant leasehold improvements. Only minor modifications to the existing space are expected, as necessary to meet the operational and security needs of Trust Bank.

- (d) **If temporary quarters are planned, provide a description of interim facility, length of use, lease terms, and other associated commitments and costs.**

Trust Bank does not plan to utilize temporary quarters, and intends to commence operations from its permanent office space.

- (e) **State whether proposed premises and fixed asset expenditures conform to applicable statutory limitations.**

The proposed premises and fixed assets expenditure conform to applicable statutory limitations.

- (f) **Outline the security program that will be developed and implemented, including the security devices.**

Trust Bank's security program is detailed in the bank's Cybersecurity Policy and Bank Premises Policy, provided as Confidential Exhibits 7(e)(iv) and 7(e)(viii), respectively.

Application of Sony Bank Incorporated to Establish a National Trust Bank and Commence Certain Activities Involving Cryptocurrency

- (g) **Discuss any significant effect the proposal will have on the quality of the human environment. Include in the discussion changes in air and/or water quality, noise levels, energy consumption, congestion of population, solid waste disposal, or environmental integrity of private land within the meaning of the National Environmental Policy Act, 42 U.S.C. 4321, et seq.**

There is no expectation that the formation of Trust Bank and its anticipated activities will have a detrimental impact on the quality of the human environment. Trust Bank's proposed operations will not materially change air or water quality, noise levels, energy consumption, population congestion, solid waste disposal, or environmental integrity of any private land within the meaning of the National Environmental Protection Act.

- (h) **Describe any plan to establish branches or relocate the main office within the first three years. Any acquisition or operating expenses should be reflected in the financial projections.**

Trust Bank does not presently plan to establish branch, trust, or representative offices within the first three years of operation. As its employee base grows in the years following the commencement of operations, the bank may seek to expand its existing footprint within the building in which its main office is located, or relocate its main office to a larger subleased space within the same building. In the event of such a relocation, all required notices and filings will be submitted to the OCC in accordance with applicable regulatory requirements.

- (i) **Indicate if the establishment of the proposed main office and/or any branch site may affect any district, site, building, structure, or object listed in, or eligible for listing in, the National Register of Historic Places pursuant to the National Historic Preservation Act, 16 U.S.C. 470f. (See the Advisory Council on Historic Preservation at www.achp.gov for the Act and implementing regulations.) Specify how such determination was made:**

- (1) **Consultation with the State Historic Preservation Officer (SHPO) and/or Tribal Historic Preservation Officer (THPO) (when tribal lands or historic properties of significance to a tribe are involved).**
- (2) **Reviewed National Register of Historic Places (see www.nps.gov/nr).**
- (3) **Applied National Register criteria to unlisted properties.**
- (4) **Reviewed historical records.**
- (5) **Contact with preservation organizations.**
- (6) **Other (describe).**

As appropriate, provide a copy of any documentation of consultation with the SHPO and/or THPO. You are reminded that if a historic property may be affected, no site

preparation, demolition, alterations, construction or renovation may occur without the appropriate regulatory agency's authorization.

Please see Confidential Exhibit 5(i).

6. Information Systems

- (a) **State whether the institution plans to market its products and services (the ability to do transactions or account maintenance) via electronic means. If yes, specifically state the products and services that will be offered via electronic banking or the Internet.**

Trust Bank intends to market its products and services that are available to the public primarily through digital channels. Please see Sections III.A.1 and III.A.2 of the Confidential Business Plan, provided as Confidential Exhibit 1(f), for additional details.

- (b) **Outline the proposed or existing information systems architecture and any proposed changes or upgrades. The information should describe how: (1) the information system will work within existing technology; (2) the information system is suitable to the type of business in which the institution will engage; (3) the security hardware, software, and procedures will be sufficient to protect the institution from unauthorized tampering or access; and (4) the organizers and directors will allocate sufficient resources to the entire technology plan.**

Please see Confidential Exhibit 6(b) for information on Trust Bank's planned information systems architecture.

- (c) **Provide lists or descriptions of the primary systems and flowcharts of the general processes related to the products and services. The level of detail in these system descriptions should be sufficient to enable verification of the cost projections in the pro formas.**

Please see Confidential Exhibit 6(c) for information regarding Trust Bank's primary systems and general processes related to the products and services to be provided.

- (d) **Estimate the start-up budget for the information systems related to the products and services and the expected annual operating and maintenance costs (including telecommunications, hardware, software, and personnel).**

Please see Confidential Exhibit 6(d) for information regarding Trust Bank's estimated start-up budget and annual maintenance costs related to the bank's information systems.

- (e) **Describe the physical and logical components of security. Describe the security system and discuss the technologies used and key elements for the security controls, internal controls, and audit procedures. Discuss the types of independent testing the institution will conduct to ensure the integrity of the system and its controls.**

Application of Sony Bank Incorporated to Establish a National Trust Bank and Commence Certain Activities Involving Cryptocurrency

Please refer to Sections V.A through V.D of the Confidential Business Plan, as provided as Confidential Exhibit 1(f), along with the bank's Cybersecurity Policy and Bank Premises Policy, provided as Confidential Exhibits 7(e)(iv) and 7(e)(viii), respectively, for additional information regarding Trust Bank's security systems, internal controls and audit procedures, along with its independent testing functions.

- (f) **Describe the information security program that will be in place to comply with the "Interagency Guidelines Establishing Standards for Safeguarding Customer Information."**

Trust Bank will abide by the bank's Safeguarding Customer Information Policy and Cybersecurity Policy, provided as Confidential Exhibits 7(e)(v) and 7(e)(iv), respectively. Further, Trust Bank maintains a Privacy Program Policy, also provided as part of Confidential Exhibit 7(e)(ii).

7. Other Information

- (a) **List activities and functions, including data processing, that will be outsourced to third parties, identifying the parties and noting any affiliations. Describe all terms and conditions of the vendor management activities and provide a copy of the proposed agreement when available. Describe the due diligence conducted and the planned oversight and management program of the vendors' or service providers' relationships (for general vendor management guidance, see the Appendix of the FFIEC's guidance, Risk Management of Outsourced Technology Services).**

Please see Section V.E of the Confidential Business Plan, as provided in Confidential Exhibit 1(f), for additional details about Trust Bank's proposed outsourcing of certain functions. Please see Confidential Exhibit 7(a)(i) for a table identifying which activities and functions will be outsourced to third parties and which will be performed within Trust Bank. Please see Confidential Exhibit 7(a)(ii) for information regarding the proposed commercial terms and conditions of key Trust Bank vendor relationships. Trust Bank will conduct due diligence and oversee its third-party vendors in accordance with its Vendor Management Policy. A copy of Trust Bank's Vendor Management Policy will be provided to the OCC later in the application and organization process.

- (b) **List all planned expenses related to the organization of the institution and include the name of recipient, type of professional service or goods, and amount. Describe how organization expenses will be paid.**

Trust Bank's organizational expenses include fees for legal advisers, consultants and personnel travel related to the organization of the institution. Organizational expenses have been or will be paid by Sony Bank as the corporate sponsor of Trust Bank's Application. Trust Bank will not reimburse Sony Bank for expenses incurred in advance of Trust Bank's opening.

Please see Confidential Exhibit 7(b) for a list of the planned expenses related to the organization of Trust Bank.

Application of Sony Bank Incorporated to Establish a National Trust Bank and Commence Certain Activities Involving Cryptocurrency

- (c) **Provide evidence that the institution will obtain sufficient fidelity coverage on its officers and employees to conform with generally accepted banking practices.**

Trust Bank will obtain sufficient fidelity coverage for its officers and employees in accordance with generally accepted banking practices, and will obtain such coverage prior to opening. Executed fidelity insurance policies will be made available to the OCC when such policies are obtained during the Trust Bank's organization phase.

- (d) **If applicable, list names and addresses of all correspondent depository institutions that have been established or are planned.**

Please see Confidential Exhibit 7(d).

- (e) **Provide a copy of management's policies for loans, investments, liquidity, funds management, interest rate risk, and other relevant policies. Provide a copy of the Bank Secrecy Act program. Contact the appropriate regulatory agencies to discuss the specific timing for submission.**

Trust Bank is developing a variety of written policies to be provided to the OCC later in the application and organization process. A full list of the draft policies that will be provided to the OCC in connection with the application and organization process is provided as Confidential Exhibit 7(e)(i).

Please see Trust Bank's preliminary set of draft policies, provided as Confidential Exhibits 7(e)(ii) – 7(e)(viii). Those draft policies include the following: (1) Privacy Program Policy; (2) Compliance Management Systems Policy; (3) Cybersecurity Policy; (4) Safeguarding Customer Information Policy; (5) Affiliate Transactions Policy; (6) Anti-Money Laundering and Sanctions Policy; and (7) Bank Premises Policy. These policies remain subject to finalization, review, and approval by the bank's Board of Directors.

- (f) **For Federal Savings Banks or Associations, include information addressing the proposed institution's compliance with qualified thrift lender requirements.**

Not applicable.

- (g) **If the institution is, or will be, affiliated with a company engaged in insurance activities that are subject to supervision by a state insurance regulator, provide:**

Trust Bank is not, and does not intend to become, affiliated with a company engaged in insurance activities that are subject to supervision by a U.S. state insurance regulator. Please see Confidential Exhibit 7(g) for information related to insurance activities undertaken by certain entities related to Trust Bank outside of the U.S.

- (1) **The name of the insurance company.**

Application of Sony Bank Incorporated to Establish a National Trust Bank and Commence Certain Activities Involving Cryptocurrency

- (2) **A description of the insurance activity that the company is engaged in and has plans to conduct.**
- (3) **A list of each state and the lines of business in that state in which the company holds, or will hold, an insurance license. Indicate the state where the company holds a resident license or charter, as applicable.**

EXHIBITS (check all that apply)

- ☒ Business Plan
 - ☒ Financial Projections
- ☐ CRA Plan
- ☒ Articles of Association, Articles of Incorporation, or Charter
- ☒ Bylaws
- ☐ Oath of Director
- ☐ Interagency Biographical and Financial Reports
- ☐ Fingerprint cards (appropriate regulatory agency)
- ☐ Publication Certification / Affidavit / Notice of Publication
- ☒ Copies of contracts / agreements
 - ☒ Employment / compensation
 - ☒ Service providers
 - ☒ Other
- ☐ Stock Benefit Plans
- ☐ Economic survey or market feasibility study
 - ☐ Market Area Map
- ☐ Waiver request, specify:

- ☐ Offering Materials
- ☐ Proposed stock certificate
- ☒ Corporate or holding company audited statements or financial reports
- ☒ Copy of policies, specify:

Draft policies included with the application are listed below:

FSA ONLY:

- ☐ RB 20a Certification

(1) Privacy Program Policy; (2) Compliance Management Systems Policy; (3) Cybersecurity Policy; (4) Safeguarding Customer Information Policy; (5) Affiliate Transactions Policy; (6) Anti-Money Laundering and Sanctions Policy; and (7) Bank Premises Policy.

OCC CERTIFICATION

We, the organizers, certify that the information contained in this application has been examined carefully and is true, correct, and complete, and is current as of the date of this submission. We also certify that any misrepresentations or omissions of material facts with respect to this application, any attachments to it, and any other documents or information provided in connection with the application for the organization of the proposed financial institution and federal deposit insurance may be grounds for denial or revocation of the charter and/or insurance, or grounds for an objection to the undersigned as proposed director(s) or officer(s) of the proposed financial institution, and may subject the undersigned to other legal sanctions, including the criminal sanctions provided for in 18 U.S.C. 1001, 1007, and 1014. We request that examiners be assigned to make any investigations necessary.

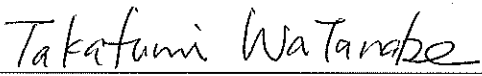
We acknowledge that approval of this application is in the discretion of the appropriate federal banking agency or agencies. Actions or communications, whether oral, written, or electronic, by an agency or its employees in connection with this filing, including approval of the application if granted, do not constitute a contract, either express or implied, or any other obligation binding upon the agency, other federal banking agencies, the United States, any other agency or entity of the United States, or any officer or employee of the United States. Such actions or communications will not affect the ability of any federal banking agency to exercise its supervisory, regulatory, or examination powers under applicable law and regulations. We further acknowledge that the foregoing may not be waived or modified by any employee or agent of a federal banking agency or of the United States.

	Signature	Date	Typed Name
X		October 3, 2025	Keiji Minami President and Representative Director of Sony Bank Inc. (Authorized Signatory)
Add Signature Line			

OCC CERTIFICATION

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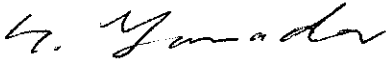
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	Signature	Date	Typed Name
X		October 3, 2025	Takafumi Watanabe
Add Signature Line			

OCC CERTIFICATION

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	Signature	Date	Typed Name
X		October 3, 2025	Takahito Yamada
Add Signature Line			

OCC CERTIFICATION

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	Signature	Date	Typed Name
X		October 3, 2025	Shugo Kimura
Add Signature Line			

OCC CERTIFICATION

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	Signature	Date	Typed Name
X		October 3, 2025	Yutoku Minanogawa
	Add Signature Line		

OCC CERTIFICATION

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We acknowledge that approval of this application is in the discretion of the appropriate federal banking agency or agencies. Actions or communications, whether oral, written, or electronic, by an agency or its employees in connection with this filing, including approval of the application if granted, do not constitute a contract, either express or implied, or any other obligation binding upon the agency, other federal banking agencies, the United States, any other agency or entity of the United States, or any officer or employee of the United States. Such actions or communications will not affect the ability of any federal banking agency to exercise its supervisory, regulatory, or examination powers under applicable law and regulations. We further acknowledge that the foregoing may not be waived or modified by any employee or agent of a federal banking agency or of the United States.

	Signature	Date	Typed Name
X	<i>Nida Davis</i>	10/01/2025	Nida Davis
Add Signature Line			

Public Exhibit 1(c)
Fiduciary Powers Application Factors

An application for fiduciary powers is required to contain the following information:

A statement requesting full or limited powers (specifying which powers).

Trust Bank is requesting full fiduciary powers from the OCC.

A statement that the capital and surplus of the national bank or Federal savings association is not less than the capital and surplus required by State law of State banks, trust companies, and other corporations exercising comparable fiduciary powers.

Trust Bank will have capital and surplus that is not less than that required by the laws of the State of New York for state banks, trust companies, and corporations exercising comparable fiduciary powers.

Sufficient biographical information on proposed senior trust management personnel, as identified by the OCC, to enable the OCC to assess their qualifications, including, if requested by the OCC, legible fingerprints and the Interagency Biographical and Financial Report, available at www.occ.gov.

Biographical information for senior Trust Bank personnel may be found in response to Questions 2(a) and 2(e) of the Application.

A description of the locations where the national bank or Federal savings association will conduct fiduciary activities.

Trust Bank will conduct fiduciary activities at its main office, located in New York.

If requested by the OCC, an opinion of counsel that the proposed activities do not violate applicable Federal or State law, including citations to applicable law.

Please see Confidential Exhibit 1(b)(i).

Any other information necessary to enable the OCC to sufficiently assess the factors described in paragraph (e)(2)(iii) of 12 C.F.R. § 5.26.

Please see the Application and Confidential Business Plan generally for additional information regarding Trust Bank, including its fiduciary operations.

Public Exhibit 4(a)
Form of Newspaper Notice

An Application to Organize a National Bank
Has Been Filed with the Office of the Comptroller of the Currency

The organizers, identified below, intending to organize and operate a national trust bank according to the provisions of the National Bank Act, as amended, submit an application to the Office of the Comptroller of the Currency for permission to organize a national bank, and propose as follows:

1. That the main office of the national bank will be located at 25 Madison Avenue, in the city of New York, New York.
2. That the national bank will have the following title: Connectia Trust, National Association.

The organizers and sponsoring organization of Connectia Trust, National Association are:

Takafumi Watanabe, Tokyo, Japan
Takahito Yamada, Tokyo, Japan
Shugo Kimura, Saitama, Japan
Yutoku Minanogawa, Los Angeles, California
Nida Davis, Brambleton, Virginia

Sony Bank Incorporated, Tokyo, Japan

Any person desiring to comment on this application may do so by submitting written comments within 30 days following the date of publication of this notice to the Director for Licensing – Midsize, Trust, Credit Card, and Novel Banks, 400 7th St., SW, Washington, DC 20219, or by emailing LicensingPublicComments@occ.treas.gov. A person who wishes to view the public file should submit a request to the Director for Licensing – Midsize, Trust, Credit Card, and Novel Banks at 400 7th St., SW, Washington, DC 20219 or by emailing Licensing@occ.treas.gov. The public may find information regarding this application, including the date of the end of the public comment period, in the OCC Weekly Bulletin at www.occ.gov.