



Cayman Monetary Regulatory Authority International

At the forefront of financial regulation, the Cayman Monetary Regulatory Authority International (CMRAI) is dedicated to upholding the highest standards of financial oversight and compliance. Our mission is to safeguard the stability and integrity of the global financial system by ensuring that financial services operate within a framework of transparency, accountability, and excellence.

As a trusted partner to financial institutions worldwide, CMRAI provides rigorous supervision, innovative solutions, and strategic guidance to foster a secure and thriving financial environment. With decades of experience and a commitment to global standards, we stand as a pillar of trust and security in an ever-evolving financial landscape.

With a legacy of excellence in financial oversight, the Cayman Monetary Regulatory Authority International (CMRAI) is a beacon of trust in the international financial community. Our role extends beyond regulation; we are innovators, collaborators, and protectors of the global financial ecosystem. By fostering compliance, promoting best practices, and embracing technological advancements, CMRAI ensures that financial services remain resilient and adaptable in a dynamic global market.

Our comprehensive approach to regulation encompasses a deep understanding of financial risks and a proactive stance on emerging challenges. We are committed to empowering financial institutions with the tools and guidance necessary to navigate complex regulatory landscapes, thereby contributing to global economic stability and growth.

AML Survey Completion Guide: Virtual Assets Service Providers

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Survey Completion Guide VASPs Page 4 of 66 1 INTRODUCTION The Cayman Monetary Regulatory Authority International (the Authority) periodically undertakes sectoral ML/TF/PF risk assessments as part of its risk-based approach to AML/CFT supervision of regulated financial service providers (FSPs). In conducting sectoral ML/TF risk assessments and other related research, the Authority uses a software called STRIX to distribute the AML Survey to FSPs and further collect, analyse, model, and score ML/TF/PF and Sanctions risk data. FSPs are required to provide this data by completing the AML Survey Form and submit it through the Authority s web-based survey software, to the Anti-Money Laundering Division (AMLD). The AML Survey Form is issued in accordance with section 9(5)(a) and (b) of the Virtual Asset (Service Providers) Act (2022 Revision) and section 34(8) of the Monetary Authority Act. This Guide gives support to FSPs which carry out Virtual Assets Service Provider (VASP) business for accessing, completion and submission of the AML Survey VASPs Form. 2 FORM INFORMATION The AML Survey VASP Form is to be completed by each FSP registered as a VASP - commonly referred to as the Entity for purposes of this form. The AML Survey VASP Form is made up of two (2) sections for collecting AML risk data: 1) AML Inherent Risks; and 2) AML Controls. 3 ACCESSING AND SUBMITTING THE AML SURVEY 3.1 ACCESS TO THE AML SURVEY

Entities will receive an invitation to the web-based survey by using the current contact details of the Entity which the Authority has on record. Each member of the Entity who receives an invitation can activate their own account. The invitation is specific to the recipient s address and cannot be shared or forwarded. Clicking on the link provided in the invitation will take the user to the account creation webpage. On successful account activation, the user will receive a confirmation . Logging into the STRIX portal is then accomplished by clicking on the Return Home button available immediately after activating, or via the link provided in the confirmation . Account login is only possible using a two-factor verification code which will be sent by to the individual. If an Entity has multiple points of contact on file, they will all have joint access to the same survey. The Authority is using the

following entity contacts to distribute the AML Survey: Registered Office, AMLCO, MLROs and any other additional contacts, upon request from the Entity. If an Entity is unsure of what their contact details are, they can contact the Authority at . To access the AML Survey: Version: 1.3 AML Survey Completion Guide VASPs Page 5 of 66

1. When the AML Survey is distributed from STRIX, the recipients will receive an invitation from Cayman Monetary Regulatory Authority International with the address . The will request the recipient to Confirm Account . The recipient should click on the Confirm Account button, which will redirect the recipient to the activation page using their default browser. A modern browser (e.g. MS Edge, Chrome, Safari) should be used for security purposes.
2. The recipient will then be asked to create a password using uppercase, lowercase, number, and a special character. The password is required to be between 8 and 16 characters long. Version: 1.3 AML Survey Completion Guide VASPs Page 6 of 66
3. The recipient will be asked to re-enter their password.
4. Once the recipient's password has been re-entered, and matches, they can submit and finish the activation process. An Notification of Successful Activation will be sent providing a Go to Portal link which can be used for all future access.

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5. The user should then click on the Return To Home button. Version: 1.3 AML Survey Completion Guide VASPs Page 8 of 66
6. The recipient should then enter their username, which is their address where they received the AML Survey invite, and the password they just created.
7. A six digit two-factor authentication code will be sent to the survey recipient's . Version: 1.3 AML Survey Completion Guide VASPs Page 9 of 66
8. The recipient should enter the six (6) digit two-factor authentication code on the webpage where prompted.
9. Click Open to access the AML Survey request. If a survey recipient is a contact for two (2) or more FSPs, or where an Entity has two or more licences or registrations, related surveys will be listed here for the recipient to view and access.

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3.2 COMPLETING THE AML SURVEY FORM

1. Click the Current Questionnaire to access the AML Survey Form and start populating the form with the required data.
 - a. Completion guidance for the AML Survey is available at section 5 of this Guide below.
 - b. The recipient(s) can open, update, and close the AML Survey as many times as needed prior to the survey due date so long as the recipient selects Save .
 - c. Once the AML Survey has been completed it can either be Saved and Exported for internal review or Saved and Submitted to the Authority. Users should note that the survey does not have Excel import functionality.
 - d. Upon submission, you will receive a confirmation from Cayman Islands Monetary Authority stating, Notification of Successful Submission . The Entity's name and the survey name will be listed for verification, useful for instances where users are submitting for more than one entity.
 - e. Once the AML Survey is Submitted an Excel and PDF copy of the completed survey will be available under Current Questionnaire .
 - f. Upon submission to the Authority a review of the AML Survey will be conducted by a member of the AMLD. If information is missing or needs clarification the Authority will Reject the AML Survey through an notification detailing the specifics. The recipient will then be required to make the necessary corrections or provide the additional detail to the Authority as indicated in the .
 - g. Partial or incomplete submissions will only be permitted by the Authority under approved circumstances. Prior to submitting an Incomplete AML Survey, the Entity is required to submit a Request for Incomplete Submission to the Authority. Incomplete Submission Requests are to be submitted to detailing the following:
 - i. Licence or Registration Name
 - ii. Licenced or Registration Number
 - iii. Date of Licence or Registration
 - iv. List of current directors
 - v.

Number of Clients vi. Reason for requesting to make an Incomplete Submission. 2. If a user receives or has access to more than one survey, they will not see the additional survey(s) in the Current Surveys section of the web page. At the top of the page, where it shows the Entity name, there should be a bold blue number indicating the number of Entity accounts the user has access to. Once the user clicks the number, a drop-down list will appear displaying the additional Entity names. 3. The STRIX portal allows you to copy two-column lists from an Excel document and paste the data directly into the survey. Given that there are several questions in the survey that require country breakdown details, the ability to bulk paste into STRIX will ease the burden of inputting individual responses. To upload bulk entries for those country breakdown questions, please do the following: Version: 1.3 AML Survey Completion Guide VASPs Page 11 of 66 a. Open an Excel spreadsheet and using 2 columns enter the question responses (number or value) in the first column and the country details (ISO code or name) in the second column. b. Highlight and copy the information from the 2 columns in Excel, select the upload button next to the relevant question in STRIX and then paste the data into the pop-up window. c. Select Add to upload the desired data into the survey form, or Clear to remove the data. Note: Individual items may also be removed from the list by clicking on the delete button, next to the respective country, on the list. 4 OTHER USEFUL INFORMATION 4.1 USER ACCOUNT LOCKOUTS In the event the AML Survey recipient has exceeded the number of permitted failed login attempts, their account will be temporarily locked. An email will be sent to the user identifying that they won't be able to log in. There are three (3) stages of lock out: 1) locked out for five (5) minutes; 2) locked out for ten (10) minutes; and, 3) if the user persists, locked out permanently. To avoid being locked out, if the user fails to remember their password, they should update their password on the login page. If the user is permanently locked out, they should contact support to request having their account re-activated. 4.2 INTERNET BROWSER Users should be aware that the AML Survey will not open using the legacy Windows Explorer browser or with dated Windows operating systems for security purposes. If the user's browser is defaulted to Explorer the link should be copied and opened in Chrome, Edge, Safari, or other modern browser. 4.3 DATA AND SECURITY The AML Survey, the auto-generated communication from STRIX, and the data collected from FSPs in the AML Survey are all maintained on-premises on the Authority's server systems. The Authority continues to use the same firewalls and data protection protocols that are deployed for the REEFs portal and other applications. 4.4 APPLICABLE FEES There are no fees associated with this Form. Version: 1.3 AML Survey Completion Guide VASPs Page 12 of 66 5 AML SURVEY GUIDANCE Below are descriptions and explanations to the risk factors and controls factors you are required to provide information. The risk factors are used to assess Inherent ML/TF Risk. Control factors are used to assess the AML/CFT/CPF, and Sanctions controls the entity has in place. AML Inherent Risk Factor Descriptions Term/Abbreviation Definition/Meaning AMLRs Anti-Money Laundering Regulations (2023 Revision), as amended. Beneficiary In relation to a transfer of virtual assets, means: a) the client (natural person, legal person, or legal arrangement) that receives virtual assets that were transferred to a virtual asset service provider or directly to the client; or b) where the transfer is received by a virtual asset service provider on behalf of a client or other third party, the natural person, legal person, or legal arrangement that ultimately receives the transfer. Client / Customer A person who is in a business relationship, or is carrying out a one-off transaction, with a person who is carrying out relevant financial business in the Islands. Controller A person appointed to assume control of the affairs of a

licensee or registrant. Corporate Entity Means a body corporate constituted under the Laws of the Islands or any other jurisdiction, which is formed specifically to perform activities, such as running an enterprise or holding assets. Currency used for the Survey United States Dollars (US\$). All other currencies must be converted to US\$ unless otherwise stated.

Dealers in Precious Metals and Stones Legal and natural persons who produce precious metals or precious stones at mining operations, or intermediate buyers and brokers, or precious stone cutters and polishers, or precious metal refiners, or jewellery manufacturers who use precious metals and precious stones, or retail sellers to the public, or Version: 1.3 AML Survey Completion Guide VASPs Page 13 of 66 buyers and sellers in the secondary and scrap markets. Direct - F2F The engagement of a client directly, with the natural person physically present. The engagement will not be via , , online, etc. Eligible Introducers A person that introduces applicants for business to a FSP whereby the FSP may place reliance on the introducer to verify the identity of the applicant for business, or beneficial owners, in accordance with Part IV of the AMLRs. The Eligible Introducer must satisfy the conditions set out in Regulation 25 of the ALMRs i.e., a person who falls within one of the categories under regulation 22(d) and who provides a written assurance pursuant to regulation 24(2)(b) that they verified the identity of an applicant for business, or beneficial owner, in accordance with Part IV of the AMLRs. Fiat currency Means currency that is issued by the relevant body in a country or by a government that is designated as legal tender in its country of issuance through, among other things, government decree or law. Fintech service Means a service that uses innovative technology to improve, change or enhance financial services but is not a virtual asset service. Foundation This definition refers to Cayman Islands foundation companies that are governed by the Companies Act (2023 Revision), except to the extent that it is modified by the Foundation Companies Act, 2017 or those foundation companies established in other jurisdictions. FRA Financial Reporting Authority. Gov / Pub Sector Business conducted in or with Government or Public Sector. High Value Dealers Any business or sole trader that accepts or makes high value cash payments of US\$15,000 or more (or equivalent in any currency) in exchange for goods. HNWI A High net worth individual (HNWI) is: (i) an individual whose net worth is at least CI\$800,000 or its equivalent in any other currency; or (ii) any person that has total assets of not less than CI\$4,000,000 or its equivalent in any other currency. Version: 1.3 AML Survey Completion Guide VASPs Page 14 of 66 HNWIs are NOT Ultra HNWI and should not be double counted. Import and Export Business A company that facilitates trades of goods and commodities between domestic and foreign companies. In other words, it s a company that buys goods internationally and ships them in for domestic purchases and/or exports goods and services produced in the home country for sale to other markets. Issuance of virtual assets or virtual asset issuance Means the sale of newly created virtual assets to the public in or from within the Islands in exchange for fiat currency, other virtual assets or other consideration but does not include the sale of virtual service token Legal Person or Arrangement Legal person means a company or other entity created by operation of law with separate legal personality. Legal arrangement means a trust or partnership or other entity created between parties which lacks separate legal personality. Money Service Businesses (MSB) Money services business means the business of providing, in or from within the Islands, any of the following services: (a) money transmission; (b) cheque cashing. (c) currency exchange. (d) the issuance, sale or redemption of money orders or traveller s cheques. Natural Person A human being, as distinguished from a company or other entity created by operation of law with separate legal personality. Nominee Director A

natural or legal person who takes on the role of company director on behalf of another.

Nominee Shareholder A nominee shareholder is someone who acts as a legal, unrelated, third party, who is officially registered as the holder of shares on behalf of the actual shareholder.

Non-face-to-face Where a customer can open an account and transact with a regulated financial service provider (FSP) without being physically present for identification purposes, at the physical premises/office of the FSP.

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Operator In relation to a virtual asset trading platform, means a person or group of persons that exerts effective control over the activities of a virtual asset trading platform however, in the absence of a single entity or group that exerts effective control over the platform, the operator shall be considered to be the owner of the entity under which the platform operates.

Originator In relation to a transfer of virtual asset, means:

- the natural person, legal person or legal arrangement that places an order with the virtual asset service provider for the virtual asset transfer; or
- where the transfer is carried out by a virtual asset service provider on behalf of a client or other third party, the client or third party who owned the virtual asset immediately before the transfer.

OSP Outsourced Service Provider (OSP) is a third party, either an affiliated entity within a group or an entity that is external to entity, that provides functions or activities on a continuing basis to a FSP, that would normally be undertaken by the regulated entity, now or in the future. Outsourcing does not include purchasing contracts.

PEP Politically Exposed Person includes

- a person who is or has been entrusted with prominent public functions by a foreign country, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executive of a state-owned corporation, and important political party official.
- a person who is or has been entrusted domestically with prominent public functions, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executives of a state-owned corporation and important political party official; and
- a person who is or has been entrusted with a prominent function by an international organization like a member of senior management, such as a director, a deputy director and a member of the board or equivalent functions.

Politically exposed persons also include:

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- Family members of a PEP who are related either directly (consanguinity) or through marriage or similar (civil) forms of partnership. Close associates to PEPs: individuals who are closely connected to PEP, either socially or professionally.

Reporting Period January 1 to 31 December 2023.

Source of Funds Source of funds is the origin of the assets that will be used to form and maintain the business relationship. A client can have multiple sources of funds which should be established and recorded separately. However, multiple sources of funds that were used when forming the business relationship and monitoring the ongoing activity should be counted together. Take this into account when answering questions relating to the Nature of Business - Source of Funding and Value of Assets Under Management.

Special Economic Zone Business Means any type of business authorised to be carried on in a special economic zone pursuant to any Law in force in the Islands.

Targeted Financial Sanctions (TSF) Means both asset freezing and restrictions and directions to prevent funds or other assets from being made available, directly, or indirectly, to or for the benefit of persons and entities designated by the Office of Financial Sanctions Implementation, HM Treasury (OFSI).

Transaction Events where services were engaged with or on behalf of a client. Services include but are not limited to those listed in Q165 through Q211.

Transfer of virtual asset Means any transaction carried out on behalf of an originator with a view to making the virtual asset available to a beneficiary.

Trust A trust is a

legal arrangement which distinguishes between the legal and beneficial ownership of property. Legal ownership is transferred to a trustee who manages and administers the property for the benefit of the beneficiaries or for the furtherance of certain purposes. UBO Ultimate Beneficial Owner - The natural person who ultimately owns or controls the customer or on whose behalf a transaction or activity is being conducted and includes but is not restricted to

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(a) in the case of a legal person other than a company whose securities are listed on a recognized stock exchange, a natural person who ultimately owns or controls, whether through direct or indirect ownership or control, 10% or more of the shares or voting rights in the legal person. (b) in the case of any legal person, a natural person who otherwise exercises ultimate effective control over the management of the legal person. (c) in the case of a legal arrangement, the trustee or other person who exercises ultimate effective control over the legal arrangement

Ultra HNWIs Ultra-High Net Worth Individuals, also referred to as UHNWI, are all HNWIs whose net worth is greater than or equal to US\$30,000,000. Value of Assets Under Management The total market value of assets or investments managed on behalf of a client or clients. The total amount can represent one client's assets under management (AUM) or the entire investment portfolio. Virtual asset Means a digital representation of value that can be digitally traded or transferred and can be used for payment or investment purposes but does not include a digital representation of fiat currencies. Virtual asset custodian Means a licensee who provides virtual asset custody services in or from within the Islands. Virtual asset custody service Means the business of safekeeping or administration of virtual assets or the instruments that enable the holder to exercise control over virtual assets. Virtual Assets Service Providers (VASPs) An entity that provides virtual asset service as a business or in the course of business. Virtual service tokens are not virtual assets and a person or legal arrangement that provides services that involve virtual service tokens. Timeframe Value of Transactions Value of transactions processed during the end of the reporting period. Timeframe Number of Transactions Number of transactions conducted for the client during the reporting period.

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AML Inherent Risk Questions: Ref No. Question No. Question Description/Explanation

1.1.1 1 Total Clients/customers at the end of the reporting period. Enter the total number of clients the entity has at the end of the reporting period. Where applicable, the number of clients /customers should only include those of the Cayman Islands legal entity. Total clients consist of natural persons and legal persons and arrangements.

1.1.2 2 Total Clients /customers throughout the reporting period. Enter how many different clients, in total, the entity conducted business with, during the reporting period. This category is specific to all clients that the entity dealt with throughout the reporting period. Therefore, the combined total should include both current and past relationships/clients falling within the January to December timeframe.

1.1.3 3 Total Transactions for the reporting period. Enter the total number of all transactions conducted for clients during the reporting period. Where applicable, the total transactions should only include those of the Cayman Islands legal entity.

1.1.4 4 Total Value of Transactions processed in the reporting period. Enter the total value of transactions processed for clients during the reporting period.

1.1.5 5 Clients/customers that are Natural Persons, broken down by nationality of the client. Enter the number of clients that are Natural Persons, subdivided by nationality. This category is specific to clients who are Natural Persons and have a direct business relationship with the Entity.

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If an Entity does not have such clients, a

0 value should be used. 1.1.6 6 Clients/customers that are Natural Persons, broken down by Residency of the client. Enter the number of clients that are natural persons, subdivided by residency. This category is specific to clients who are Natural Persons and have a direct business relationship with the entity. If an entity does not have such clients, a 0 value should be used. 1.1.7 7 Total Transactions for the reporting period for all Natural Persons. Enter the total number of transactions conducted for clients, who are natural persons, during the reporting period. This category is specific to clients who are Natural Persons and have a direct business relationship with the entity. If an entity did not conduct such transactions, a 0 value should be used. 1.1.8 8 Value of Transactions processed, in the reporting period, for all Natural Persons. Enter the total value of transactions processed for clients that are natural persons, during the reporting period. This category is specific to clients who are Natural Persons and have a direct business relationship with the entity. If an entity does not manage assets for its clients, a 0 value should be used. 1.1.9 9 Clients/customers that are Legal Persons and Arrangements, broken down by country of incorporation of the client. Enter the total number of clients that are Legal Persons and Arrangements, subdivided by country of incorporation, during the reporting period. Examples include, but are not limited to, corporate entities, foundations and trusts. If an entity does not have such clients, a 0 value should be used. 1.1.10 10 Number of Transactions - Legal Persons and Arrangements. Enter the total number of transactions that were conducted by customers who are legal person and arrangements, during the reporting period. Version: 1.3 AML Survey Completion Guide VASPs Page 20 of 66 Examples include, but are not limited to, corporate entities, foundations and trusts. If an entity did not conduct such transactions, a 0 value should be used. 1.1.11 11 Value of Transactions processed, for the reporting period, for all Legal Persons and Arrangements. Enter the total value of transactions processed for clients who are Legal Persons or Arrangements, during the reporting period. Examples include, but are not limited to, corporate entities, foundations, and trusts. If an entity does not manage assets for these clients, a 0 value should be used. 1.1.12 12 Total number of High Risk clients/customers at the end of the reporting period. Enter the total number of High Risk clients the entity has at the end of the reporting period. 1.1.13 13 Total number of PEP clients/ customers at the end of the reporting period. Enter the total number of PEPs the entity conducts business with at the end of the reporting period. This category is specific to all PEPs. Therefore, the combined total should include, but not limited to, natural persons/ individual clients who are PEPs, legal persons that have related UBOs, Directors or other controlling persons of corporate entities that are PEPs, and legal arrangements where settlors of Trusts are PEPs. A PEP should not be counted more than once regardless of the number of business or personal relationships they have with the entity. 1.1.14 14 Total number of Non-Compliant Accounts at the end of the reporting period. Enter the number of customers where sufficient CDD has not been collected, at the end of the reporting period. 1.2.1 15 Total number of UBOs by country of nationality of the UBO. Enter the total number of UBOs of all clients who are legal persons or arrangements, broken down by nationality of the UBO, during the reporting period. This category is specific to Legal Persons and Arrangements. Examples include, but are not limited to, the total number of UBOs of Corporate entities and Settlers of Trusts. Version: 1.3 AML Survey Completion Guide VASPs Page 21 of 66 A UBO should not be counted more than once regardless of the number of business relationships they have with the entity. If the entity does not have any clients that fit this category, record a 0. 1.2.2 16 Does the entity have any clients that have UBOs that are directors of the client? Answer Yes or No 1.2.3 17 Number of clients which

have UBOs that are directors of the client. Enter the total number of clients which have UBOs that are also directors of the client, during the reporting period. 1.2.4 18 Does the entity have any clients that have UBOs that are Controllers of the client? Answer Yes or No 1.2.5 19 Number of clients which have UBOs that are Controllers of the client. Enter the total number of clients whose UBOs are also controllers of the client. 1.2.6 20 Does the entity have any clients which have UBOs - HNWI? Please answer Yes or No . 1.2.7 21 Number of Clients which have UBOs - HNWI. Enter the total number of clients who have UBOs that are also HNWI. HNWI is specific to those persons whose net worth is at least C\$800,000 (approx. US\$1,000,000), or those that have assets valued at least C\$4,000,000 (approx. US\$5,000,000). Do Not include those clients / customers with net worth that is equal to or greater than US\$30,000,000. 1.2.8 22 Does the entity have any clients which have UBOs - Ultra HNWI? Please answer Yes or No . 1.2.9 23 Number of Clients which have UBOs - Ultra HNWI. Enter the total number of clients who have UBOs that are also Ultra HNWI. UHNWI is specific to those persons whose net worth is equal to or greater than US\$30,000,000. 1.2.10 24 Does the entity have any clients which have UBOs which are PEPs? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide VASPs Page 22 of 66 1.2.11 25 Number of UBOs of clients which are PEPs, broken down by nationality of the PEP. Enter the total number of clients who have UBOs that are also PEPs, categorized by the nationality of the PEP. 1.2.12 26 Does the entity have any clients which have Nominees acting on behalf of a UBO? Please answer Yes or No . 1.2.13 27 Number of clients which have Nominees acting on behalf of a UBO, broken down by nationality of the client. Enter the total number of clients which have nominees acting on behalf of UBOs, categorized by the nationality of the client. 1.3.1 28 Number of clients which have a nominee appointed on behalf of a director, broken down by country of nationality of the director. Enter the total number of clients with nominee directors during the reporting period. 1.3.2 29 Number of directors and/or senior management of clients who are PEPs, broken down by nationality of the director / senior management. Enter the total number of clients who have directors and/or senior management who are also PEPs during the reporting period. 1.3.3 30 Number of directors and/or senior management of clients who are High Net Worth Individuals, broken down by nationality of the director / senior management. Enter the number of directors and/or senior management of the clients who are also HNWI during the reporting period. 1.3.4 31 Number of directors and/or senior management of clients who are Ultra High Net Worth Individuals, broken down by nationality of the director / senior management. Enter the number of directors and/or senior management of the clients who are also Ultra HNWI during the reporting period. 1.3.5 32 Number of directors and/or senior management of clients who are PEPs & High Net Worth Individuals, broken down by nationality of the director / senior management. Enter the number of directors and/or senior management of the clients who are both PEPs and HNWI during the reporting period. 1.4.1 33 Does the entity have any clients that are Gov / Pub Sector? Please answer Yes or No . 1.4.2 34 Gov / Pub Sector - Number of Clients, broken down by country of the government jurisdiction. Enter the number of clients the entity has, during the reporting period, that are a government or Version: 1.3 AML Survey Completion Guide VASPs Page 23 of 66 Public Sector, broken down by government jurisdiction. 1.4.3 35 Gov / Pub Sector - Number of Transactions. Enter the number of transactions processed by clients that are Government or Public Sector, during the reporting period, broken down by government jurisdiction. 1.4.4 36 Gov / Pub Sector - Value of Transactions for the reporting period. Enter the value of transactions processed for

clients that are Government or Public Sector, during the reporting period. 1.4.5 37 Does the entity have any clients that are NPOs? Please answer Yes or No . 1.4.6 38 NPO - Number of Clients, broken down by country of incorporation of the client. Enter the number of NPO clients the entity has, during reporting period. 1.4.7 39 NPO - Number of Transactions. Enter the number of transactions processed for clients that are NPOs, during the reporting period 1.4.8 40 NPOs - Value of Transactions for the reporting period. Enter the value of transactions processed for clients that are NPOs, during the reporting period. 1.4.9 41 Does the entity have any clients that are Foundations? Please answer Yes or No . 1.4.10 42 Foundations - Number of Clients, broken down by country of establishment of the client. Enter the number of clients the entity has, as at last date of reporting period, that are a Foundation. 1.4.11 43 Foundations - Number of Transactions. Enter the number of transactions conducted by clients that are a Foundation, during the reporting period. 1.4.12 44 Foundations - Value of Transactions for the reporting period. Enter the Value of Transactions processed for clients that are Foundations, during the reporting period. 1.4.13 45 Does the entity have any clients that are trusts? Please answer Yes or No . 1.4.14 46 Trusts - Number of Clients, broken down by country of incorporation of the client. Enter the number of clients the entity has, during the reporting period, that are Trusts. Version: 1.3 AML Survey Completion Guide VASPs Page 24 of 66 1.4.15 47 Trusts - Number of Transactions. Enter the number of transactions conducted by clients that are a Trusts, during the reporting period. 1.4.16 48 Trusts - Value of Transactions for the reporting period. Enter the Value of Transactions processed for clients that are Trusts, during the reporting period. 1.4.17 49 Does the entity have any clients that are Segregated Portfolio Companies? Please answer Yes or No . 1.4.18 50 Segregated Portfolio Companies - Number of Clients, broken down by country of incorporation of the client. Enter the number of clients the entity has that are Segregated Portfolio Companies, during the reporting period. 1.4.19 51 Segregated Portfolio Companies - Number of Transactions. Enter the number of transactions conducted by clients that are Segregated Portfolio Companies, during the reporting period. 1.4.20 52 Segregated Portfolio Companies - Value of Transactions for the reporting period. Enter the value of transactions processed for clients that are Segregated Portfolio Companies, during the reporting period. 1.4.21 53 Does the entity have any Special Economic Zone clients? Please answer Yes or No . 1.4.22 54 Special Economic Zone - Number of Clients, broken down by country of incorporation of the client. Enter the number of clients the entity has that are Special Economic Zone companies, during the reporting period. 1.4.23 55 Special Economic Zone - Number of Transactions. Enter the number of transactions conducted by clients that are Special Economic Zone companies, during the reporting period. 1.4.24 56 Special Economic Zone - Value of Transactions for the reporting period. Enter the value of transactions processed for clients that are Special Economic Zone companies, during the reporting period. 1.4.25 57 Does the entity have any clients that are Funds / Collective Investment Vehicles? Please answer Yes or No . 1.4.26 58 Funds / Collective Investment Vehicles - Number of Clients, broken down by country of incorporation of the client. Enter the number of clients the entity has that are Funds / Collective Investment Vehicles, during the reporting period. Version: 1.3 AML Survey Completion Guide VASPs Page 25 of 66 1.4.27 59 Funds / Collective Investment Vehicles - Number of Transactions. Enter the number of transactions conducted by clients that are Funds / Collective Investment Vehicles, during the reporting period. 1.4.28 60 Funds / Collective Investment Vehicles - Value of Transactions for the reporting period. Enter the Value of Transactions processed during the reporting period, by clients that hold Funds /

Collective Investment Vehicles 1.5.1 61 Does the entity have any clients that are Natural Persons? Please answer Yes or No . 1.5.2 62 Natural Persons - Does the entity have any clients that are PEPs? Please answer Yes or No . 1.5.3 63 Number of Natural Persons who are PEPs, broken down by nationality of the client. Enter the number of clients the entity has that are Natural Persons and also PEPs, during the reporting period. 1.5.4 64 Natural Persons - PEPs - Number of Transactions. Enter the number of transactions conducted by clients that are Natural Persons and also PEPs, during the reporting period. 1.5.5 65 Natural Persons - PEPs - Value of Transactions for the reporting period. Enter the value of transactions processed for clients that are Natural Persons and also PEPs, during the reporting period. 1.5.6 66 Does the entity have any Natural Person clients that are HNWI's? Please answer Yes or No . 1.5.7 67 Number of Natural Persons who are HNWI's, broken down by nationality of the client. Enter the number of clients the entity has that are Natural Persons and also HNWI's, during the reporting period. 1.5.8 68 Natural Persons - HNWI's - Number of Transactions. Enter the number of transactions conducted by clients that are Natural Persons and also HNWI's, during the reporting period. 1.5.9 69 Natural Persons - HNWI's - Value of Transactions for the reporting period. Enter the value of transactions processed for clients that are Natural Persons and also HNWI's, during the reporting period. 1.5.10 70 Does the entity have any Natural Person clients that are PEPs and HNWI's? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide VASPs Page 26 of 66 1.5.11 71 Number of Natural Persons who are PEPs & HNWI's, broken down by nationality of the client. Enter the number of clients the entity has who are a combination of Natural Persons, PEPs, and HNWI's, during the reporting period. 1.5.12 72 Natural Persons - PEPs & HNWI's - Number of Transactions. Enter the number of transactions conducted by clients who are a combination of Natural Persons, PEPs, and HNWI's, during the reporting period. 1.5.13 73 Natural Persons - PEPs & HNWI's - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients who are a combination of Natural Persons, PEPs, and HNWI's, during the reporting period. 1.5.14 74 Does the entity have any Natural Person clients that are Ultra HNWI's? Please answer Yes or No . 1.5.15 75 Number of Natural Persons who are Ultra HNWI's, broken down by nationality of the client. Enter the number of clients the entity has that are Natural Persons and also Ultra HNWI's, during the reporting period. 1.5.16 76 Natural Persons Ultra HNWI's - Number of Transactions. Enter the number of transactions conducted by clients that are Natural Persons and also Ultra HNWI's, during the reporting period. 1.5.17 77 Natural Persons Ultra HNWI's - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients that are Natural Persons and also Ultra HNWI's, during the reporting period. 1.5.18 78 Does the entity have any Natural Person clients that are PEPs and Ultra HNWI's? Please answer Yes or No . 1.5.19 79 Number of Natural Persons who are PEPs & Ultra HNWI's, broken down by nationality of the client. Enter the number of clients the entity has who are a combination of Natural Persons, PEPs, and Ultra HNWI's, during the reporting period. 1.5.20 80 Natural Persons - PEPs & UHNWI's - Number of Transactions. Enter the number of transactions conducted by clients who are a combination of Natural Persons, PEPs, and Ultra HNWI's, during the reporting period. Version: 1.3 AML Survey Completion Guide VASPs Page 27 of 66 1.5.21 81 Natural Persons - PEPs & UHNWI's - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients who are a combination of Natural Persons, PEPs, and Ultra HNWI's, during the reporting period. 1.6.1 82 Source of Funds Please provide the total number of clients that are legal persons of, or natural persons employed in, the following sectors: Banking

Institutions (excluding MSBs) Other Financial Regulated Business* Financial Leasing Money Lending Accountants Fintech *excluding MSBs, VASPs, and Trusts, Company Managers, or Corporate Service Providers. Enter the total number of clients that fall within the list of the sectors. 1.6.2 83 Does the entity have any clients that are legal persons operating as Banking Institutions (excluding MSBs), or natural persons that are employed by Banking Institutions (excluding MSBs)? Please answer Yes or No . 1.6.3 84 Banking Institutions (excluding MSBs) - Number of Clients. Enter the number of clients the entity has that are legal persons operating as Banking Institutions (excluding MSBs), and natural persons that are employed by Banking Institutions (excluding MSBs). 1.6.4 85 Does the entity have any clients that are legal persons operating as Other Financial Regulated Businesses, or natural persons employed by Other Financial Regulated Businesses? Please answer Yes or No . 1.6.5 86 Other Financial Regulated Business - Number of Clients. Enter the number of clients the entity has that are legal persons operating as Other Financial Regulated Business, and natural Version: 1.3 AML Survey Completion Guide VASPs Page 28 of 66 persons that are employed by Other Financial Regulated Businesses. 1.6.6 87 Does the entity have any clients that are legal persons operating in Financial Leasing, or natural persons employed in Financial Leasing? Please answer Yes or No . 1.6.7 88 Financial Leasing- Number of Clients. Enter the number of clients the entity has, that are legal persons operating as Financial Leasing companies, and natural persons that are employed by Financial Leasing companies. 1.6.8 89 Does the entity have any clients that are legal persons operating in Money Lending, and natural persons employed in Money Lending? Please answer Yes or No . 1.6.9 90 Money Lending - Number of Clients. Enter the number of clients the entity has, that are legal persons operating as Money Lending institutions, and natural persons that are employed by Money Lending institutions. 1.6.10 91 Does the entity have any clients that are legal persons operating as Accountants (Audit/ Assurance/ Bookkeeping/ Insolvency), or natural persons employed by Accountants? Please answer Yes or No . 1.6.11 92 Accountants (Audit/ Assurance/ Bookkeeping/ Insolvency) - Number of Clients. Enter the number of clients the entity has, that are legal persons operating as Accountants (Audit/ Assurance/ Bookkeeping/ Insolvency), and natural persons that are employed by Accountants (Audit/ Assurance/ Bookkeeping/ Insolvency). 1.6.12 93 Does the entity have any legal person clients that are in the Fintech industry, or natural persons employed in the Fintech industry? Please answer Yes or No . 1.6.13 94 Fintech - Number of Clients. Enter the number of clients the entity has, that are legal persons operating in the Fintech industry, Version: 1.3 AML Survey Completion Guide VASPs Page 29 of 66 and natural persons that are employed in the Fintech industry. 1.6.14 95 Please provide the total number of clients that are legal persons of, or natural persons employed in, the following sectors: Legal Practitioners Dealers in Precious Metals and Stones Money Service Business (MSBs) Virtual Asset Service Providers (VASPs) High Value Dealers Trusts, Company Managers or Corporate Service Providers Import/Export Industry Shipping and Transport of Goods Provide the total number of clients that fall within the list of the sectors. 1.6.15 96 Does the entity have any clients that are legal persons operating as Legal Practitioners, or natural persons employed by Legal Practitioners? Please answer Yes or No . 1.6.16 97 Legal Practitioner - Number of Clients. Enter the number of clients the entity has, that are legal persons operating as Legal Practitioners, and natural persons that are employed by Legal Practitioners. 1.6.17 98 Dealers in Precious Metals and Stones - Number of Clients. Enter the number of clients the entity has, that are legal persons operating as Dealers in Precious Metals and Stones, and

natural persons that are employed by Dealers in Precious Metals and Stones. 1.6.18 99 Does the entity have any clients that are legal persons operating in the Gambling business (including online gambling), or natural persons employed in the Gambling business? Please answer Yes or No . 1.6.19 100 Does the entity have any clients that are legal persons operating as Money Services Businesses, or natural persons that are employed by Money Services Businesses? Please answer Yes or No . 1.6.20 101 Money Services Business - Number of Clients. Enter the number of clients the entity has, that are legal persons operating in the Money Services Business, and natural persons that Version: 1.3 AML Survey Completion Guide VASPs Page 30 of 66 are employed in the Money Services Business. 1.6.21 102 Does the entity have any clients that are legal persons operating as VASPs, or natural persons employed by VASPs? Please answer Yes or No . 1.6.22 103 Virtual Asset Service Providers (VASPs) - Number of Clients. Enter the number of clients the entity has, that are legal persons offering virtual asset products and services, and natural persons that are employed by institutions which offer virtual asset products and services. 1.6.23 104 Does the entity have any clients that are legal persons operating as High Value Dealers, or natural persons employed by High Value Dealers? Please answer Yes or No . 1.6.24 105 High Value Dealers - Number of Clients. Enter the number of clients the entity has, that are legal persons operating as High Value Dealers, and natural persons that are employed by High Value Dealers. 1.6.25 106 Does the entity have any clients that are legal persons or arrangements operating as Trusts, Company Managers, or Corporate Service Providers, or natural persons employed by Trusts, Company Managers, or Corporate Service Providers? Please answer Yes or No . 1.6.26 107 Trusts, Company Managers, or Corporate Service Providers - Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements operating as Trusts, Company Managers, or Corporate Service Providers, and natural persons that are employed by Trusts, Company Managers, or Corporate Service Providers. 1.6.27 108 Does the entity have any clients that are legal persons operating in the Import/ Export Industry, or natural persons employed by the Import/ Export Industry? Please answer Yes or No . 1.6.28 109 Import/ Export - Number of Clients. Enter the number of clients the entity has, that are legal persons Version: 1.3 AML Survey Completion Guide VASPs Page 31 of 66 operating in the Import/ Export business, and natural persons that are employed the Import/ Export industry. 1.6.29 110 Does the entity have any clients that are legal persons operating in the Shipping and Transport of Goods industry, or natural persons employed by the Shipping and Transport of Goods industry? Please answer Yes or No . 1.6.30 111 Shipping and Transport of Goods - Number of Clients. Enter the number of clients the entity has, that are legal persons operating in the Shipping and Transport of Goods business, and natural persons that are employed in the Shipping and Transport of Goods industry. 1.6.31 112 Please provide the total number of clients that are legal persons of, or natural persons employed in, the following sectors: Real Estate Agents/Brokers Gambling Business Adult Entertainment Industry Defence Industry Oil and Gas Industry Mining Construction / Development Retail / Restaurant Cannabis Industry Provide the total number of clients that fall within the list of the sectors. 1.6.32 113 Does the entity have any clients that are legal persons operating as Real Estate Agent/ Brokers, or natural persons employed as Real Estate Agents/ Brokers? Please answer Yes or No . 1.6.33 112 Real Estate Agents / Brokers - Number of Clients. Enter the number of clients the entity has, that are legal persons operating as Real Estate Agents / Brokers, and natural persons that are employed by Real Estate Agents. 1.6.34 113 Does the entity have any clients that are legal persons operating

as Dealers in Precious Metals and Stones, or natural persons employed as Dealers in Precious Metals and Stones? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide VASPs Page 32 of 66

1.6.35 116 Gambling business (including online gambling) - Number of Clients. Enter the number of clients the entity has, that are legal persons operating in the Gambling business (including online gambling), and natural persons that are employed in the Gambling business (including online gambling). 1.6.36

117 Does the entity have any clients that are legal persons operating in the Adult Entertainment industry, or natural persons employed in the Adult Entertainment industry? Please answer Yes or No . 1.6.37

118 Adult Entertainment - Number of Clients. Enter the number of clients the entity has, that are legal persons operating in the Adult Entertainment Industry, and natural persons that are employed in the Adult Entertainment Industry. 1.6.38

119 Does the entity have any clients that are legal persons operating in the Defence Industry, or natural persons employed by the Defence Industry? Please answer Yes or No . 1.6.39

120 Defence Industry - Number of Clients. Enter the number of clients the entity has, that are legal persons operating in the Defence Industry, and natural persons that are employed in the Defence Industry. 1.6.40

121 Does the entity have any clients that are legal persons operating in the Oil and Gas Industry, or natural persons employed by the Oil and Gas Industry? Please answer Yes or No . 1.6.41

122 Oil and Gas Industry - Number of Clients. Enter the number of clients the entity has, that are legal persons operating in the Oil and Gas Industry, and natural persons that are employed in the Oil and Gas Industry. 1.6.42

123 Does the entity have any clients that are legal persons operating in the Mining Industry, or natural persons employed by the Mining Industry? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide VASPs Page 33 of 66

1.6.43 124 Mining Industry - Number of Clients. Enter the number of clients the entity has, that are legal persons operating in the Mining Industry, and natural persons that are employed in the Mining Industry. 1.6.44

125 Does the entity have any clients that are legal persons operating in the Construction / Development industry, or natural persons employed in the Construction / Development industry? Please answer Yes or No . 1.6.45

126 Construction / Development - Number of Clients. Enter the number of clients the entity has, that are legal persons operating in the Construction / Development industry, and natural persons that are employed in the Construction / Development industry. 1.6.46

127 Does the entity have any clients that are legal persons operating in the Retail & Restaurant Business, or natural persons employed in the Retail & Restaurant Business? Please answer Yes or No . 1.6.47

128 Retail & Restaurant Business - Number of Clients. Enter the number of clients the entity has, that are legal persons operating in the Retail & Restaurant Business, and natural persons that are employed in the Retail & Restaurant Business. 1.6.48

129 Does the entity have any clients that are legal persons operating in the Cannabis Production & Distribution industry, or natural persons employed in the Cannabis Production & Distribution industry? Please answer Yes or No . 1.6.49

130 Cannabis Production & Distribution - Number of Clients. Enter the number of clients the entity has, that are legal persons operating in the Cannabis Production & Distribution industry, and natural persons that are employed in the Cannabis Production & Distribution industry. 1.6.50

131 Does the entity have any clients that are legal persons of Unknown Business, or natural persons employed in Unknown Professions or Industries? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide VASPs Page 34 of 66

1.6.51 132 Unknown Businesses and Professions - Number of Clients. Enter the number of clients the entity has, that are legal persons of Unknown Businesses and Professions, and natural persons that are employed in Unknown

Businesses and Professions. Unknown businesses and professions are where the entity does not know, and was not provided with, and verified, the line of business or profession of the client.

1.6.52 133 Does the entity have any clients where their business / Source of Funding is not listed in a category above? Please answer Yes or No .

1.6.53 134 Other - Not mentioned above - Number of Clients. Enter the number of clients the entity has, that are legal persons operating in known businesses/industries, not mentioned above, and natural persons that are employed in known businesses/industries, not mentioned above.

1.7.1 135 Source of Funds Value of Transactions Please provide the total Value of Transactions for the reporting period, with clients that are legal persons of, or are natural persons employed in, the following sectors: Banking Institutions (excluding MSBs) Other Financial regulated Business* Financial Leasing Money Lending Legal Practitioners Accountants Fintech *excluding MSBs, VASPs, and Trusts, Company Managers, and or Corporate Service Providers. Enter the total value of transactions conducted by clients that are legal persons operating as, and natural persons employed in, the listed sectors.

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1.7.2 136 Banking Institutions (excluding MSBs) - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients that are legal persons operating as Banking Institutions (excluding MSBs), and natural persons that are employed in Banking Institutions (excluding MSBs).

1.7.3 137 Other Financial Regulated Business - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients that are legal persons operating as Other Financial Regulated Business not mentioned in this section, and natural persons that are employed in any Other Financial Regulated Business.

1.7.4 138 Financial Leasing - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients that are legal persons operating in the Financial Leasing business, and natural persons that are employed in the Financial Leasing business.

1.7.5 139 Money Lending- Value of Transactions for the reporting period. Enter the value of transactions conducted by clients that are legal persons operating in the Money Lending business, and natural persons that are employed by Money Lending businesses.

1.7.6 140 Accountants (Audit/ Assurance/ Bookkeeping/ Insolvency) - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients that are legal persons operating as Accountants (Audit/ Assurance/ Bookkeeping/ Insolvency), and natural persons that are employed by Accountants (Audit / Assurance / Bookkeeping / Insolvency).

1.7.7 141 Fintech - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients that are legal persons and are in the Fintech industry, and natural persons that are employed in the Fintech industry

1.7.8 142 Please provide the total Value of Transactions for the reporting period, with clients that are legal persons of, or are natural persons employed in, the following sectors: Legal Practitioners Enter the total value of transactions conducted by clients that are legal persons operating as, and natural persons employed in, the listed sectors.

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Dealers in Precious Metals and Stone MSBs VASPs High Value Dealers Trusts, Company Managers, or Corporate Service Providers Import/Export Industry Shipping and Transport of Goods

1.7.9 143 Legal Practitioner - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients that are legal persons operating as Legal Practitioners, and natural persons that are employed by Legal Practitioners.

1.7.10 144 Dealers in Precious Metals and Stones - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients that are legal persons operating as Dealers in Precious Metals and Stones, and natural persons that are

employed by Dealers in Precious Metals and Stones. 1.7.11 145 Money Services Business - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients that are legal persons operating in the Money Services Business, and natural persons that are employed in the Money Services Business. 1.7.12 146 VASPs - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients that are legal persons offering virtual asset products and services, and natural persons that are employed by providers of virtual asset products and services. 1.7.13 147 High Value Dealers - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients that are legal persons operating as High Value Dealers, and natural persons that are employed by High Value Dealers. 1.7.14 148 Trusts, Company Managers, or Corporate Service Providers - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients that are legal persons or arrangements operating as Trusts, Company Managers, or Corporate Service Providers, and natural persons that are employed Version: 1.3 AML Survey Completion Guide VASPs Page 37 of 66 by Trusts, Company Managers, or Corporate Service Providers. 1.7.15 149 Import/Export Industry - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients that are legal persons operating in the Import/ Export Industry, and natural persons that are employed in the Import/ Export Industry. 1.7.16 150 Shipping and Transport of Goods - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients that are legal persons operating in the Shipping and Transport of Goods Industry, and natural persons that are employed in the Shipping and Transport of Goods Industry. 1.7.17 151 Please provide the total Value of Transactions for the reporting period, with clients that are legal persons of, or are natural persons employed in, the following sectors: Real Estate Agents/Brokers Gambling Business Adult Entertainment Industry Defence Industry Oil and Gas Industry Mining Construction / Development Retail / Restaurant Cannabis Industry Enter the total value of transactions conducted by clients that are legal persons operating as, and natural persons employed in, the listed sectors. 1.7.18 152 Real Estate Agents / Brokers - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients that are legal persons operating as Real Estate Agents / Brokers, and natural persons that are employed by Real Estate Agents / Brokers. 1.7.19 153 Gambling business (including online gambling) - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients that are legal persons operating in the Gambling business (including online gambling), and natural persons that are employed in the Gambling business (including online gambling). 1.7.20 154 Adult Entertainment - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients that are legal persons operating in the Adult Entertainment business, and natural persons that are employed Version: 1.3 AML Survey Completion Guide VASPs Page 38 of 66 in the Adult Entertainment business. 1.7.21 155 Defence Industry - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients that are legal persons operating in the Defence Industry, and natural persons that are employed in the Defence Industry. 1.7.22 156 Oil and Gas Industry - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients that are legal persons operating in the Oil and Gas Industry, and natural persons that are employed in the Oil and Gas Industry. 1.7.23 157 Mining - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients that are legal persons operating in the Mining Industry, and natural persons that are employed in the Mining Industry. 1.7.24 158 Construction / Development - Value of

Transactions for the reporting period. Enter the value of transactions conducted by clients that are legal persons operating in the Construction / Development business, and natural persons that are employed in the Construction / Development industry. 1.7.25 159 Retail & Restaurant Business - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients that are legal persons operating in the Retail & Restaurant Business, and natural persons that are employed in the Retail & Restaurant Business. 1.7.26 160 Cannabis Production & Distribution - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients that are legal persons operating in the Cannabis Production & Distribution business, and natural persons that are employed in the Cannabis Production & Distribution business. 1.7.27 161 Industry / profession not known or not recorded - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients that are legal persons operating in unknown or unrecorded Industries/ Professions, and natural persons that are employed in unknown or unrecorded Industries/ Professions. Version: 1.3 AML Survey Completion Guide VASPs Page 39 of 66 1.7.28 162 Other - Not listed above - Value of Transactions for the reporting period. Enter the value of transactions conducted by clients that are legal persons operating in known Businesses/ Industries/ Professions not listed above, and natural persons that are employed in known Businesses/ Industries/ Professions not listed above. 1.8.1 163 Do you have any comments or feedback for this tab? Please select Yes or No . 1.8.2 164 Please use this area to provide any comments or feedback for this tab. Provide any comments or feedback that may be relevant, which you could not provide on the tabs above. 2.1.1 165 Does the entity offer Custodian Services? Please answer Yes or No . 2.1.2 166 Custodian Services - Number of Clients. Enter the number of clients that have been offered custodian services by the entity, during the reporting period. 2.1.3 167 Custodian Services - Number of Transactions Enter the number of transactions that the entity processed for clients that it offered custodian services to, during the reporting period. 2.1.4 168 Custodian - Value of Fiat Assets Under Management. Enter the value of Fiat Assets Under Management for clients that the entity offered custodian services to, during the reporting period. 2.1.5 169 Custodian - Value of Securities Under Management. Enter the value of Securities Under Management for clients that the entity offered custodian services to, during the reporting period. 2.1.6 170 Custodian - Value of Virtual Assets Under Management. Enter the value of Virtual Assets Under Management for clients that the entity offered custodian services to, during the reporting period. 2.1.7 171 Is the entity an issuer of Private VA Coins and Tokens? Please answer Yes or No . 2.1.8 172 Issuer Private VA Coins and Tokens - Number of Clients. Enter the number of clients that were issued Private VA Coins and Tokens by the entity, during the reporting period. Version: 1.3 AML Survey Completion Guide VASPs Page 40 of 66 2.1.9 173 Issuer of Private VA Coins and Tokens - Number of Transactions. Enter the number of transactions the entity conducted, relating to issuance of Private VA Coins and Tokens, during the reporting period. 2.1.10 174 Issuers of Private VA Coins and Tokens - Gross Value of AUM. Enter the gross value of Assets Under Management of Private VA Coins and Tokens issued during the reporting period. 2.1.11 175 Is the entity an issuer of Public VA Coins and Tokens? Please answer Yes or No . 2.1.12 176 Issuer of Public VA Coins and Tokens - Number of Clients. Enter the number of clients that were issued with Public VA Coins and Tokens by the entity, during the reporting period. 2.1.13 177 Issuer of Public VA Coins and Tokens - Number of Transactions. Enter the number of transactions the entity conducted, relating to issuance of Public VA Coins and Tokens, during the reporting period. 2.1.14 178 Issuers of Public VA Coins and Tokens -

Gross Value of AUM. Enter the gross value of Assets Under Management, of Public VA Coins and Tokens issued by the entity, during the reporting period. 2.1.15 179 Is the entity a Dealer of VA Coins and Tokens? Please answer Yes or No . 2.1.16 180 Dealer of VA - Number of Clients. Enter the number of clients the entity provided the Dealer of VA Coins and Tokens services to, during the reporting period. 2.1.17 181 Dealer of VA - Number of Transactions. Enter the number of transactions the entity processed as a Dealer of VA Coins and Tokens, during the reporting period. 2.1.18 182 Dealer of VA - Value of Transactions. Enter the value of transactions relating to the services rendered by the entity as a Dealer of VA Coins and Tokens, during the reporting period. 2.1.19 183 Is the entity an Operator of a Virtual Asset Platform / Exchange? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide VASPs Page 41 of 66 2.1.20 184 Does the entity allow/use privacy coins/anonymity-enhancing cryptocurrencies on the platform/exchange? Please answer Yes or No . 2.1.21 185 VA Platform / Exchange - Number of Clients. Enter the number of clients the entity provided with the services of an operator of a Virtual Asset Platform / Exchange, during the reporting period. 2.1.22 186 VA Platform / Exchange - Number of Transactions. Enter the number of transactions that the entity processed as an operator of a Virtual Asset Platform / Exchange, during the reporting period. 2.1.23 187 VA Platform / Exchange - Total Value of Transactions. Enter the total value of transactions that the entity processed as an operator of a Virtual Asset Platform / Exchange, during the reporting period. 2.1.24 188 Does the entity service Clients as an Agency Broker for Virtual Assets? Please answer Yes or No . 2.1.25 189 Agency Broker for VA - Number of Clients. Enter the number of clients the entity provided the services of an Agency Broker for VA, during the reporting period. 2.1.26 190 Agency Brokers for VA - Number of Transactions. Enter the number of transactions that the entity processed as an Agency Broker for VA, during the reporting period. 2.1.27 191 Agency Broker for VA - Value of Transactions. Enter the total value of transactions that the entity processed relating to the service rendered as an Agency Broker for VA, during the reporting period. 2.1.28 192 Does the entity provide other investment activities not listed above? Please answer Yes or No . 2.1.29 193 Other Investment Activities - Number of Clients. Enter the number of clients to which the entity provided other investment activities not listed above, during the reporting period. Version: 1.3 AML Survey Completion Guide VASPs Page 42 of 66 2.1.30 194 Other Investment Activities VA - Number of Transactions. Enter the number of transactions that the entity processed, during the reporting period, relating to other VA investment activities, which are not listed above. 2.1.31 195 Other Investment Activities - VA - Value of Transactions. Enter the total value of transactions relating to other VA investment activities, not listed above, which the entity provided during the reporting period. 2.1.32 196 Indicate the types of 'Other Investment Activities' . Name all that apply. List all other VA investment activities not listed above, which the entity offers. 2.2.1 197 Does the entity conduct batch processing for client transactions? Please answer Yes or No . 2.2.2 198 Batch Processing - Average Number of Clients processed within a week Enter the average number of clients processed by the entity each week, through Batch Processing of transactions. 2.2.3 199 Batch Processing - Average Value of Transactions processed within a week. Enter the average value of transactions processed within a week, using the Batch Processing of transactions method. 2.2.4 200 Does the entity engage in Crypto Lending? Please answer Yes or No . 2.2.5 201 Crypto Lending - Number of Clients. Enter the number of clients the entity lent Crypto to, during the reporting period. 2.2.6 202 Crypto Lending - Number of Transactions. Enter the number of transactions conducted, during the reporting period, involving the entity lending

Crypto to clients. 2.2.7 203 Crypto Lending - Value of Transactions. Enter the value of transactions conducted, during the reporting period, relating to the entity lending Crypto to clients. 2.2.8 204 Does the entity operate VA ATMs? Please answer Yes or No . 2.2.9 205 Number of VA ATMs, broken down by country of ATM location. Enter the number of VA Automated Teller Machines (ATMs) the entity has, broken down by country of location of the ATM. Version: 1.3 AML Survey Completion Guide VASPs Page 43 of 66 2.2.10 206 VA ATM Operator - Number of Transactions, broken down by the country of the ATM. Enter the number of transactions conducted at the VA Automated Teller Machines (ATMs), during the reporting period, broken down by country of location of the ATM. 2.2.11 207 VA ATM Operator - Value of Transactions, broken down by country of VA ATM. Enter the value of transactions conducted on the VA Automated Teller Machines (ATMs) during the reporting period, broken down by country of location of the ATM. 2.2.12 208 Does the entity provide Mixers, Tumbler, Blenders, Foggers, or similar products and services to clients? Please answer Yes or No . 2.2.13 209 Mixer Products and Services - Number of Clients. Enter the number of clients where mixer products and services are applied. 2.2.14 210 Mixer Products and Services - Number of Transactions. Enter the number of transactions conducted, during the reporting period, relating to Mixer Products and Services. 2.2.15 211 Mixer Products and Services - Value of Transactions. Enter the total value of the transactions conducted, during the reporting period, relating to Mixer Products and Services.

2.3.1 212 Does the entity facilitate payments of Clients in the form of Physical Cash? Please answer Yes or No . 2.3.2 213 Physical Cash - Number of Clients. Enter the number of clients that processed Physical Cash transactions, during the reporting period. 2.3.3 214 Physical Cash - Number of Transactions. Enter the number of Physical Cash transactions conducted during the reporting period. Payments include those between the entity and the client and those conducted on behalf of the entity. 2.3.4 215 Physical Cash - Value of Funds Transferred. Enter the total value of funds transferred in form of Physical Cash during the reporting period. Version: 1.3 AML Survey Completion Guide VASPs Page 44 of 66 2.3.9 216 Does the entity facilitate payments of Clients in the form of Virtual Currency? Please answer Yes or No . 2.3.10 217 Virtual Currency - Number of Clients. Enter the number of clients that processed payments in the form of Virtual Currency during the reporting period. 2.3.11 218 Virtual Currencies - Number of Transactions. Enter the number of Virtual Currency transactions the clients conducted, during the reporting period. 2.3.12 219 Virtual Currencies - Value of Transactions. Enter the value of funds transferred by clients using Virtual Currencies during the reporting period. 2.3.13 220 Does the entity facilitate payments of Clients via Third Parties? Please answer Yes or No . 2.3.14 221 Third Parties - Number of Clients. Enter the number of clients which conducted payments via Third Parties during the reporting period. Payments via third party means that the payment was paid to a third party not associated with the business relationship or transaction. 2.3.15 222 Third Parties - Number of Transactions. Enter the number of Third-Party transactions conducted by clients during the reporting period. 2.3.16 223 Third Parties - Value of Transactions. Enter the value of funds transferred by clients during the reporting period, using payments via Third Parties. 2.3.17 224 Does the entity facilitate payments of Clients via Credit Card? Please answer Yes or No . 2.3.18 225 Credit Card Payments - Number of Clients Enter the number of clients made payments via Credit Card during the reporting period. 2.3.19 226 Credit Card Payments - Number of Transactions. Enter the number of transactions conducted by clients, during the reporting period, using Credit Cards. 2.3.20 227 Credit Card Payments Value of Transactions. Enter the value of transactions processed by

clients, during the reporting period, using Credit Cards. 2.3.21 228 Does the entity facilitate payments of Clients in the form of Wire Transfers? Please answer Yes or No . 2.3.22 229 Wire Transfers - Number of Clients. Enter the number of clients which made payments in the form of Wire Transfers during the reporting period. 2.3.23 230 Wire Transfers - Number of Transactions. Enter the number of Wire Transfer transactions conducted by clients, during the reporting period. 2.3.24 231 Wire Transfers - Value of Funds Transferred. Enter the value of funds wire transferred by clients during the reporting period. 2.3.29 232 Does the entity facilitate payments with Clients in the form of Transfer of Securities? Please answer Yes or No . 2.3.30 233 Transfer of Securities - Number of Clients. Enter the number of clients which made payments in the form of Transfer of Securities, during the reporting period. 2.3.31 234 Transfer of Securities - Number of Transactions. Enter the number of transactions made by clients, during the reporting period, in the form of Transfer of Securities. 2.3.32 235 Transfer of Securities - Value Transactions. Enter the value of funds transferred by clients during the reporting period, by way of Transfer of Securities. 2.3.33 236 Does the entity facilitate payments of Clients in other forms not listed above? Please answer Yes or No . 2.3.34 237 Other Forms of Payment - Number of Clients. Enter the number of clients which made payments using other forms of payment not listed above, during the reporting period. 2.3.35 238 Other Forms of Payment - Number of Transactions. Enter the number of transactions conducted by clients during the reporting period, using other forms of payment other than the ones listed above. Version: 1.3 AML Survey Completion Guide VASPs Page 46 of 66 2.3.36 239 Other Forms of Payment - Value of Transactions. Enter the value of funds that were transferred by clients during the reporting period, using other forms of payments not listed above. 2.3.37 240 Please indicate the types of Other Forms of Payment. List the Other Forms of Payment processed by clients during the reporting period, which are not listed above. 2.4.1 241 Total value of all funds received, not only those relating to client funds, broken down by originating country of payment. Enter the total value of funds received by clients, on behalf of clients, or on behalf of the entity during the reporting period, broken down by the country where the funds originated. 2.4.2 242 Total number of transactions received, broken down by origin country of the transaction. Enter the total number of transactions, received during the reporting period, broken down by country of origin of the funds. 2.4.3 243 Total value of all funds transferred out not only those relating to client funds, broken down by the country of payment destination. Enter the total value of funds transferred out of the jurisdiction by clients, on behalf of clients, or on behalf of the entity during the reporting period, broken down by the country of payment destination. 2.4.4 244 Total number of transactions transferred out, broken down by destination country of the transaction. Enter the total number of outgoing transactions during the reporting period relating, broken down by destination country of the transaction. 2.5.1 245 Do you have any comments or feedback for this tab? Please answer Yes or No . 2.5.2 246 Please use this area to provide any comments or feedback for this tab. Provide comments or feedback. Please include N/A if no comment. 3.1.1 247 Total number of Clients - Direct - F2F. Provide the total number of clients, in the entity's entire current portfolio, that were onboarded via F2F methods, and not only those onboarded during the reporting period. 3.1.2 248 Total number of Clients - Direct - Non-F2F. Provide the total number of clients, in the entity's entire portfolio, that were onboarded via Non-F2F methods, and not only those Version: 1.3 AML Survey Completion Guide VASPs Page 47 of 66 onboarded during the reporting period. Examples of Direct Non-F2F include instances where the entity is

onboarding clients through , or online platform; however, they do not have Direct F2F contact with the clients. 3.1.3 249 Total number of clients via Online Platforms. Provide the total number of clients, in the entity's entire portfolio, that were onboarded via Online platforms, and not only those onboarded during the reporting period. 3.1.4 250 Number of Clients through Referrals within Group - F2F during the reporting period, broken down by the UBOs nationality. Enter the number of clients which were onboarded using referrals within Group - F2F for clients onboarded during the reporting period, broken down by the UBOs nationality. An example of Group F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself have F2F interaction with the clients. 3.1.5 251 Number of Clients - Direct - Non- F2F, broken down by nationality of the UBO. Enter the number of clients which were onboarded using referrals within Group and via Non Face to Face Channels for the reporting period, broken down by nationality of the UBOs. Example of Group Non F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself does not have F2F interaction with the clients. 3.1.6 252 Total number of Clients onboarded through Eligible Introducers. Total clients in the entity's entire portfolio that were onboarded using Eligible Introducers where the entity continues to rely on the Eligible Introducer for verification of the clients identity. An Eligible Introducer is a person who falls within one of the Version: 1.3 AML Survey Completion Guide VASPs Page 48 of 66 categories under Regulation 22(d) and who provides a written assurance pursuant to Regulation 24(2)(b) that they verified the identity of an applicant for business, or beneficial owner, in accordance with Part IV of the AMLRs. 3.1.7 253 Number of Clients onboarding through Eligible Introducers during the reporting period, broken down by nationality of the UBO. Enter the number of clients which were onboarded through Eligible Introducers, during the reporting period, broken down by the nationality of the UBO. 3.1.8 254 Number of Clients onboarded through other introducers, and not Eligible Introducers, (Non-F2F), broken down by nationality or country of incorporation of the client. Enter the number of clients, that were onboarded through Other Introducers Non - F2F, for the reporting period, broken down by nationality of the UBOs. 3.1.9 255 Clients onboarding via Online Platforms during the reporting period, broken down by nationality of the UBO. Enter the number of clients onboarded using online platforms during the reporting period, broken down by nationality of the UBO. 3.1.11 256 Number of Clients via Hot Wallets, broken down by nationality or country of incorporation of the client. Enter the number of clients which were onboarded via Hot Wallets, broken down by nationality or country of incorporation of the client. Provide the total number of clients, in the entity's entire portfolio, that were onboarded via Hot Wallets, for the reporting period. 3.1.12 257 Number of Clients via Cold Wallets, broken down by nationality or country of incorporation of the client. Enter the number of clients which were onboarded via Cold Wallets, broken down by nationality or country of incorporation of the client. Provide the total number of clients, in the entity's entire portfolio, for the reporting period. 3.1.1 258 Has the entity outsourced the role of AML Compliance Officer within the reporting period? Please answer Yes or No . 3.2.2 259 To whom has the AML Compliance Officer role been outsourced? Select one of the following options which best describes the outsource relationship for the AML Compliance Officer: Member within Group 3rd Party and Member within Group 3rd Party Select "3rd Party and Member within Group", in cases where the AML Compliance Officer turnover includes one of each within the reporting period. 3.2.3 260 What was the country of residency of the AML Compliance Officer at the end of the reporting period?

Enter the country of residency of the AML Compliance Officer at the end of the reporting period. 3.2.4 261 How many AML Compliance Officers have you had in the reporting period and the previous 2 years? If no turnover of the AML Compliance Officer role in the three-year period, answer "1". 3.2.5 262 Has the entity outsourced the role of Money Laundering Reporting Officer within the reporting period? Please answer Yes or No . 3.2.6 263 To whom has the Money Laundering Reporting Officer role been outsourced? Select one of the following options which best describes the outsource relationship for the Money Laundering Reporting Officer: Member within Group 3rd Party and Member within Group 3rd Party Select 3rd Party and Member within Group", in cases where the Money Laundering Reporting Officer turnover includes one of each within the reporting period. 3.2.7 264 What was the country of residency of the Money Laundering Reporting Officer at the end of the reporting period? Enter the country of residency of the Money Laundering Reporting Officer at the end of the reporting period. 3.2.8 265 How many Money Laundering Reporting Officers have you had in the reporting period and the previous 2 years? If no turnover of the Money Laundering Reporting Officer role in the three-year period, answer "1". Version: 1.3 AML Survey Completion Guide VASPs Page 50 of 66 3.2.9 266 Has the entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period? Please answer Yes or No . 3.2.10 267 To whom has the Deputy Money Laundering Reporting Officer role been outsourced? Select one of the following options which best describes the outsource relationship for the Deputy Money Laundering Reporting Officer: Member within Group 3rd Party and Member within Group 3rd Party Select 3rd Party and Member within Group", in cases where the Deputy Money Laundering Reporting Officer turnover includes one of each within the reporting period. 3.2.11 268 What was the country of residency of the Deputy Money Laundering Reporting Officer at the end of the reporting period? Enter the country of residency of the Deputy Money Laundering Reporting Officer at the end of the reporting period. 3.2.12 269 How many Deputy Money Laundering Reporting Officers have you had in the reporting period and the previous 2 years? If no turnover of the Deputy Money Laundering Reporting Officer role in the three-year period, answer "1". 3.2.13 270 Has the entity outsourced the function of Targeted Financial Sanction (TFS) screening within the reporting period? Please answer Yes or No . 3.2.14 271 To whom has the Targeted Financial Sanction screening function been outsourced? Select one of the following options which best describes the outsource relationship for the screening of Targeted Financial Sanctions: Member within Group 3rd Party and Member within Group 3rd Party Select 3rd Party and Member within Group", in cases where the screening of Targeted Financial Sanctions turnover includes one of each within the reporting period. 3.2.15 272 What was the outsourcing country of the Targeted Financial Sanction screening function at the end of the reporting period? Enter the country that the entity outsourced the Targeted Financial Sanction screening function to, during the reporting period. Version: 1.3 AML Survey Completion Guide VASPs Page 51 of 66 3.2.16 273 How many TFS screening platforms have you had in the reporting period and the previous 2 years? If no turnover of the Targeted Financial Sanction screening function in the three-year period, answer "1". 3.2.17 274 Has the entity outsourced the function of Transaction Monitoring within the reporting period? Please answer Yes or No . 3.2.18 275 To whom has the Transaction Monitoring function been outsourced? Select one of the following options which best describes the outsource Transaction Monitoring relationship: Member within Group 3rd Party and Member within Group 3rd Party Select 3rd Party and Member within Group",

in cases where the Transaction Monitoring services turnover includes one of each within the reporting period. 3.2.19 276 What was the outsourcing country of the Transaction Monitoring function at the end of the reporting period? Enter the country the entity outsourced the Transaction Monitoring function to, at the end of the reporting period. 3.2.20 277 How many Transaction Monitoring platforms have you had in the reporting period and the previous 2 years? If no turnover of the Transaction Monitoring platform in the three-year period, answer "1". 3.3.1 278 Has the entity outsourced the function of Trading platform within the reporting period? Please answer Yes or No . 3.3.2 279 To whom has the Trading platform function been outsourced? Select one of the following options which best describes the outsource relationship for the Trading platform: Member within Group 3rd Party and Member within Group 3rd Party Select 3rd Party and Member within Group", in cases where the Trading platform turnover includes one of each within the reporting period. Version: 1.3 AML Survey Completion Guide VASPs Page 52 of 66 3.3.3 280 What was the outsourcing country of the Trading platform function at the end of the reporting period? Enter the country the entity outsourced the Trading platform function to, at the end of the reporting period. 3.3.4 281 How many Trading platforms have you had in the reporting period and the previous 2 years? If no turnover of the Trading platform function in the three-year period, answer "1". 3.3.5 282 Has the entity outsourced the function of Liquidity platforms within the reporting period? Please answer Yes or No . 3.3.6 283 To whom has the Liquidity platform function been outsourced? Select one of the following options which best describes the outsource relationship for the Liquidity platform: Member within Group 3rd Party and Member within Group 3rd Party Select 3rd Party and Member within Group", in cases where of the Liquidity platform turnover that includes one of each within the reporting period. 3.3.7 284 What was the outsourcing country of the Liquidity platform function at the end of the reporting period? Enter the country the entity outsourced the Liquidity platform function to, at the end of the reporting period. 3.3.8 285 How many Liquidity platforms have you had in the reporting period and the previous 2 years? If no turnover of the Liquidity platform function in the three-year period, answer "1". 3.3.9 286 Has the entity outsourced the function of Mixer, Blender, Fogger, or other similar services within the reporting period? Please answer Yes or No . 3.3.10 287 To whom has Mixer, or similar services, been outsourced? Select one of the following options which best describes one of the following options which best describes the outsource relationship for the Mixer, Blender, Fogger, or other similar services: Member within Group 3rd Party and Member within Group 3rd Party Version: 1.3 AML Survey Completion Guide VASPs Page 53 of 66 Select 3rd Party and Member within Group", in cases where the Mixer services that includes one of each within the reporting period. 3.3.11 288 What was the outsourcing country of the Mixer Services function at the end of the reporting period? Enter the country the entity outsourced the Mixer, Blender, Fogger, or other similar services to, at the end of the reporting period. 3.3.12 289 How many Mixer Service Providers have you transacted with in the reporting period and the previous 2 years? If no turnover of the Mixer, Blender, Fogger, or other similar services in the three-year period, answer "1". 3.3.13 290 Did the entity engage in Margin Trading during the reporting period? Please answer Yes or No . 3.3.14 291 Number of Margin Trading Transactions Enter the number of Margin Trading transactions the entity conducted, during the reporting period. 3.3.15 292 Value of funds borrowed by the entity for Margin Trading, broken down by borrowing country. Enter the Value of funds borrowed by the entity during the reporting period, for Margin Trading transactions, broken down by borrowing country 3.4.1 293 Physical presence - Place of Business. Enter the

country of the entity's physical business operations. 3.4.2 294 In which countries by percentage of equity ownership are all Shareholders of the entity located. For publicly listed entities please list beneficial ownership of 10% or more. Insert countries where all Shareholders of the entity are located and their percentage of equity ownership. For publicly listed entities please list beneficial ownership of 10% or more. 3.4.3 295 Number of Branches by location, broken down by country of operation. Enter the number of Branches the entity has, broken down by country of operation. 3.4.4 296 Number of Subsidiaries by location, broken down by country of operation. Enter the number of Subsidiaries the entity has, broken down by country of operation. 3.4.5 297 In which country is the Parent or Holding Company incorporated? Enter the country of incorporation for the Parent or Holding Company. 3.4.6 298 Percentage of Controlling Interests in the entity, broken down by Insert countries where persons or beneficial owners who control the Version: 1.3 AML Survey Completion Guide VASPs Page 54 of 66 country of location of the Controlling Interests. entity are located, and their percentage of Controlling Interest in the entity. For publicly listed entities please list beneficial ownership of 10% or more. 3.4.7 299 Does the entity have any licence or registration in another jurisdiction? Please answer Yes or No . 3.4.8 300 Did the entity receive any penalty or other enforcement action in another jurisdiction(s)? Please answer Yes or No . 3.4.9 301 List the jurisdiction(s) which enforcement action was taken. If none, use '0' to indicate none. Enter the name(s) of the jurisdiction(s) which enforcement action was taken, if any. If none, use '0' to indicate none. 3.4.10 302 Does the entity hold a Controlling Interest in another legal person or legal arrangement engaged in Virtual Asset products or services? Please answer Yes or No . 3.4.11 303 List the jurisdiction(s) where the entity holds a Controlling Interest in another legal person or arrangement engaged in Virtual Asset products or services. Enter the name(s) of the jurisdiction(s) which the entity holds a Controlling Interest in another legal person or arrangement engaged in Virtual Asset products or services. If none, use '0' to indicate none. 3.5.1 304 Do you have any comments or feedback for this tab? Please answer Yes or No . 3.5.2 305 Please use this area to provide any comments or feedback for this tab. Use this area to provide any comments or feedback for this tab. Please enter 'N/A' if no comment.

AML Controls Questions: No. Question No. Question Description/Explanation 1.1.1 306 Does the Governing Body receive comprehensive reports, information and statistics regarding ML/TF/PF risks and issues? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide VASPs Page 55 of 66 1.1.2 307 Does the Governing Body review all AML/CFT/CPF related policies and procedures periodically? Please answer Yes or No . 1.1.3 308 What is the frequency, in months, that AML/CFT/CPF and Sanctions matters are reported to the Board? Enter the frequency in number of months. 1.1.4 309 Is there an audit risk and compliance subcommittee? Please answer Yes or No . 1.1.5 310 Is there an approved Charter for the Governing Body and Sub- Committees? Please answer Yes or No . 1.1.6 311 Is the entity subject to group wide governance practices? Please answer Yes or No . 1.1.7 312 Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body? Please answer Yes or No . 1.1.8 313 Is AML/CFT/CPF, including regulatory audit findings, a standard agenda item at Board/Principal and/or Board committee meetings? Please answer Yes or No . 1.1.9 314 Does the Board / Governing Body ensure that recommendations made by the internal and external auditors and regulators to address AML/CFT/CPF and Sanctions findings are acted upon in a timely manner? Please answer Yes or No . 1.1.10 315 Has the entity, or its directors, shareholders, beneficial owners, or senior officers been denied an application

by any regulatory body? Please answer Yes or No . 1.1.11 316 Provide the country of jurisdiction. Enter the names of the jurisdiction(s) in which the entity, or its directors, shareholders, beneficial owners or senior officers were denied an application by any regulatory body. 1.1.12 317 Are any of the entity's AML Officers, Shareholders, Beneficial Owners, Directors, or Senior Management PEPs? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide VASPs Page 56 of 66 1.1.13 318 Does the Board ensure that the AMLCO/MLRO receive the appropriate training? Please answer Yes or No . 1.2.1 319 Has an AML Compliance Officer been appointed? Please answer Yes or No . 1.2.2 320 Has an MLRO been appointed? Please answer Yes or No . 1.2.3 321 Is a Deputy MLRO appointed? Please answer Yes or No . 1.2.4 322 Is the AMLCO employed at a managerial level of the company? Please answer Yes or No . 1.2.5 323 For reporting lines, does the AMLCO report to the Governing Body? Please answer Yes or No . 1.2.6 324 Does the AMLCO maintain independence from revenues related / client facing activities? Please answer Yes or No . 1.2.7 325 Does the AMLCO have sufficient compliance/AML skills and experience to perform their function? Please answer Yes or No . 1.2.8 326 Does the AMLCO report to the Board on AML/CFT/CPF related issues and on the adequacy of the AML/CFT/CPF framework? Please answer Yes or No . 1.2.9 327 Does the AMLCO conduct any sample testing and review any exception reports to identify potential AML/CFT/CPF compliance breaches? Please answer Yes or No . 1.2.10 328 Does the AMLCO provide oversight of the AML/CFT/CPF and Sanctions risk assessment framework and procedures? Please answer Yes or No . 1.2.11 329 Does the MLRO maintain independence from revenues related / client facing activities? Please answer Yes or No . 1.2.12 330 Does the MLRO report to the Board on AML/CFT/CPF related issues and on the adequacy of the AML/CFT/CPF framework? Please answer Yes or No . 1.3.1 331 Has the entity developed and implemented AML/CFT/CPF and Sanctions training and awareness programme? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide VASPs Page 57 of 66 1.3.2 332 Have the directors received AML/CFT/CPF and Sanctions training during the reporting period? Please answer Yes or No . 1.3.3 333 Has the AML Compliance Officer received specialized compliance/AML/CFT/CPF training over the last year relevant to the current position? Please answer Yes or No . 1.3.4 334 Has the MLRO received specialized compliance/AML/CFT/CPF training over the last year relevant to the current position? Please answer Yes or No . 1.3.5 335 Has the DMLRO received specialized compliance/AML/CFT/CPF training over the last year relevant to the current position? Please answer Yes or No . 1.3.6 336 Does the AMLCO ensure that ongoing training programs are kept up to date and relevant? Please answer Yes or No . 1.3.7 337 Are changes to policy and procedures communicated to all staff/directors and senior management? Please answer Yes or No . 1.3.8 338 Does the entity assess AML/CFT/CPF and Sanctions knowledge of its employees? Please answer Yes or No . 1.3.9 339 What percentage of employees/agents/directors that have NOT been exposed to AML/CFT/CPF training by the company during the reporting period? Enter the percentage of employees/ agents/ directors that have NOT been exposed to AML/CFT/CPF training by the entity during the reporting period. 1.3.10 340 Does the AMLCO organize or ensure AML/CFT/CPF and Sanctions training is conducted for all staff annually? Please answer Yes or No . 1.4.1 341 Does the entity have an internal audit department / unit / function with oversight over AML functions? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide VASPs Page 58 of 66 1.4.2 342 Is there a developed Internal Audit plan, with focus on AML/CFT/CPF and Sanctions, reviewed by the Board? Please answer

Yes or No . 1.4.3 343 Is the Internal Audit plan approved by the Board? Please answer Yes or No . 1.4.4 344 Does the internal AML audit include reviews of the AML/CFT/CPF related policies, procedures and processes? Please answer Yes or No . 1.4.5 345 Has the AML audit function performed an AML/CFT/CPF and Sanctions audit and issued a report for conclusions and recommendations? Please answer Yes or No . 1.4.6 346 What is the frequency, in months, of the internal AML audit for the AML/CFT/CPF and Sanctions Programme? Enter the frequency, in months, of how often an internal AML audit for the AML/CFT/CPF and Sanctions programme is conducted. 1.4.7 347 Does the Board review the AML audit program? Please answer Yes or No . 1.4.8 348 Enter the frequency, in months, of the Board review of the AML audit program? Enter the frequency, in months, of the Board review of the AML audit program. 1.4.9 349 Where applicable, does the internal audit include testing on functions which are outsourced? Please select Yes , No , or Not Applicable . 1.4.10 350 Where applicable, does the internal audit include testing of EI relationships? Please enter Yes, No, or Not Applicable. 1.4.11 351 Does the Internal Audit include testing for the AML/CFT/CPF and Sanctions training function? Please answer Yes or No . 1.4.12 352 Does the Internal Audit include testing for the entity's TFS and PF controls? Please answer Yes or No . 1.5.1 353 Does the entity conduct a business risk assessment which considers ML/TF/PF and Sanctions risk factors? Please answer Yes or No . 1.5.2 354 Does the entity employ a Risk Based Methodology when assessing Please answer Yes or No . Version: 1.3 AML Survey Completion Guide VASPs Page 59 of 66 and allocating oversight of its clients? 1.5.3 355 Does the entity consider the ML/TF/PF risks of the clients, (including UBOs, in their risk assessment? Please answer Yes or No . 1.5.4 356 Does the entity consider the ML/TF/PF geographic location (also of counterparties and affiliates, branches, subsidiaries etc.) in their risk assessment? Please answer Yes or No . 1.5.5 357 Does the entity consider the ML/TF/PF products and services (existing and new) in their risk assessment? Please answer Yes or No . 1.5.6 358 Does the entity consider the ML/TF/PF delivery channels (existing and new) in their risk assessment? Please answer Yes or No . 1.5.7 359 Does the entity ensure ML/TF/PF business risk assessments are done / updated prior to the launch of any new products/services/delivery channels/technologies? Please answer Yes or No . 1.5.8 360 Does the entity consider the ML/TF/PF technology (existing and new) in their risk assessment? Please answer Yes or No . 1.5.9 361 Does the entity consider Sanctions risk factors in their risk assessment? Please answer Yes or No . 1.5.10 362 Does the entity consider PF risk factors in their risk assessment? Please answer Yes or No . 1.5.11 363 Does the entity consider outsourcing risk factors in its risk assessment? Please answer Yes or No . 1.5.12 364 Does the entity take their nature, size and complexity into consideration and consider the need for other risk factors, other than those listed above, when developing their business risk assessment? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide VASPs Page 60 of 66 1.5.13 365 How often, in months, do you review High-Risk relationships/accounts? Please respond using the following: Never, More than 18 months, 7 12 months, 1 6 months. 1.5.14 366 How often, in months, do you review medium-Risk relationships/accounts? Please respond using the following: Never, More than 18 months, 7 12 months, 1 6 months. 1.5.15 367 How often, in months, do you review low-Risk relationships/accounts? Please respond using the following: Never, More than 18 months, 7 12 months, 1 6 months. 1.6.1 368 Does the entity rely on Group AML/CFT policies and procedures? Please answer Yes or No . 1.6.2 369 If yes, has the entity conducted a GAP Analysis to identify whether the AML/CFT programme complies with Cayman's legislation

and regulatory framework? Please answer Yes or No . 1.6.3 370 Has the Board, or governing body, ensured that necessary amendments are made to the entity's policies and procedures for alignment with the requirements in the Cayman Islands? Please answer Yes or No . 1.6.4 371 Does the entity have Board, or governing body, approved policies and procedures for Customer Due Diligence measures i.e. customer identification and verification? Please answer Yes or No . 1.6.5 372 Does the entity have Board, or governing body, approved policies and procedures for identification of high risk customers inc. PEPs? Please answer Yes or No . 1.6.6 373 Does the entity have Board, or governing body, approved policies and procedures for establishing Source of Funds? Please answer Yes or No . 1.6.7 374 Does the entity have Board, or governing body, approved policies and procedures for employee screening? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide VASPs Page 61 of 66 1.6.8 375 Does the entity have Board or governing body approve policies and procedures for training of staff? Please answer Yes or No . 1.6.9 376 Does the entity have Board or governing body approved policies and procedures for ensuring confidential sharing and preservation of data within the group? Please answer Yes or No . 1.6.10 377 Does the entity have policies and procedures on collecting due diligence on counterparties and business associates? Please answer Yes or No . 1.6.11 378 Does the entity have procedures for declining, de-risking terminating or restricting business relationships due to AML/CFT/CPF and Sanctions related reasons? Please answer Yes or No . 1.6.12 379 Enter the total number of business relationships or clients' accounts that were de-risked /declined /terminated/restricted due to AML/CFT/CPF and Sanctions concerns for the reporting period. 1.7.1 380 Does the entity have a screening process? Please answer Yes or No . 1.7.2 381 Is the screening process manual, automated or a combination? Select which best applies: Manual, Automated, or Automated with Manual Checks. 1.7.3 382 Is the screening process fully or partially outsourced? Please select Fully or Partially . 1.7.4 383 When designated list are updated, does the screening process reflect these updates within 24 hours? Please answer Yes or No . 1.7.5 384 Is sanctions monitoring done in real time or after the event? Select what applies: No process , After the event , or Real time . 1.7.6 385 Is the customer and counterparty database screened against the designated H.M. Treasury list? Please answer Yes or No . 1.7.7 386 Are procedures in place to ensure customers / counterparties are screened prior to payouts (remittance of funds)? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide VASPs Page 62 of 66 1.7.8 387 Does the entity have Asset Freeze procedures? Please answer Yes or No . 1.7.9 388 Have the assets of any customers identified as persons or entities designated by the United Nations Security Council or by the High Court as terrorists or for PF been frozen? Please answer Yes or No . 1.7.10 389 Does the entity maintain a report of results of alerts, methodology of clearing alerts, and those positive matches resulting of sanction screening? Please answer Yes or No . 1.7.11 390 Does the entity have systems and procedures in place to determine whether the entity or any of its affiliates, subsidiaries or counterparties is located within or operating from any country/jurisdiction that is subject to economic or financial sanctions? Please answer Yes or No . 1.7.12 391 Does the entity have systems and procedures in place to determine whether the entity or any of its affiliates, subsidiaries or counterparties is engaged in transactions, investments, business or other dealings that directly or indirectly involve or benefit any country/jurisdiction that is subject to economic or financial sanctions? Please answer Yes or No . 1.7.12 392 Does the entity have policies and procedures in place to ensure transactions conducted with customers / counterparties of countries

surrounding sanctioned jurisdictions are scrutinized to ensure those the unlisted countries are not being used as conduits to evade targeted financial sanctions and proliferation alerts / risks? Please answer Yes or No . 1.8.1 393 Does the entity have transaction monitoring policies and procedures developed commensurate to its operations? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide VASPs Page 63 of 66 1.8.2 394 Does the entity have policies and procedures for restricting or flagging transactions (including international wire transfers, manager s drafts, and trade finance transactions) with countries where there are sanctions imposed or those that have been identified as having TF/PF deficiencies? Please answer Yes or No . 1.8.3 395 Does the entity have in place an automated system for monitoring transactions for potential suspicion and reporting suspicious transactions? Please answer Yes or No . 1.8.4 396 Is there a requirement for senior management approval before establishing high risk business relationships i.e. with PEPs? Please answer Yes or No . 1.8.5 397 Does the entity have EDD procedures? Please answer Yes or No . 1.8.6 398 Does the entity apply EDD on customers and counterparties based in higher-risk countries? Please answer Yes or No . 1.8.7 399 Where high risk clients are identified, did the entity conduct EDD measures for every transaction such customers carry out? Please answer Yes or No . 1.8.8 400 Enter the total number of Alerts resulting in Suspicious Activity Reports related to ML/TF/PF and Sanctions matters identified during transaction monitoring. The total number of alerts produced through transaction monitoring which resulted in the escalation of an internal SAR. 1.9.1 401 Does the entity have Internal Reporting policies and procedures i.e. Identification and Reporting of Suspicious Activities and Transactions to the MLRO? Please answer Yes or No . 1.9.2 402 Does the entity s policies and procedures identify the MLRO and how to make a filing to them? Please answer Yes or No . 1.9.3 403 Does the entity have policies and procedures for reporting to the FRA? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide VASPs Page 64 of 66 1.9.4 404 How many internal Suspicious Activity/Transaction Reports have been reported to the MLRO for the current reporting period? Enter the number of internal Suspicious Activity/Transaction Reports reported to the MLRO during the reporting period. 1.9.5 405 How many Suspicious Activity Reports have been reported, to the FRA, by the MLRO for the current reporting period? Enter the number of external Suspicious Activity Reports filed by the MLRO, to the FRA, during the reporting period. 1.9.6 406 How many hours on average does it take to file a SAR to the FRA? Enter the number of hours (average) the entity takes to file a Suspicious Activity/Transaction Report to the FRA. 1.9.7 407 Has the entity been requested by law enforcement agencies or the courts to provide any information relating to its customers, business activities, directors or senior management? Please answer Yes or No . 1.9.8 408 Has the entity been penalized or received a warning for non- compliance, from the FRA? Please answer Yes or No . 1.9.9 409 Does the entity maintain a log identifying all internal SARs filed to the MLRO along with their status? Please answer Yes or No . 1.9.10 410 Does the entity maintain a log identifying all SARs filed to the FRA along with their status? Please answer Yes or No . 1.9.11 411 If the MLRO decides not to file a SAR to the FRA is the reason for not filing documented? Please answer Yes or No . 1.10.1 412 Does the entity maintain Record Keeping Procedures? Please answer Yes or No . 1.10.2 413 How many years after the end of the business relationship are records retained? Enter the number of years 1.10.3 414 Are any records retained and accessible in the Cayman Islands? Please answer Yes or No . 1.10.4 415 How accessible and swiftly available are records for competent authorities - in hours? Enter the average time to comply in hours.

1.10.5 416 Does the entity maintain a declined business log? Please answer Yes or No .
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1.10.6 417 Does the entity maintain records of its training programme? Please answer Yes or No .

1.11.1 418 If applicable, is there a board approved documented policy on outsourcing? Select which best applies: Yes , No or Not Applicable . This question is only applicable if the entity outsources any activities.

1.11.2 419 Was a risk assessment conducted on all outsourcing arrangements prior to initiation of the arrangement? Select which best applies: Yes , No or Not Applicable .

1.11.3 420 Is there regular ongoing reviews of the outsourcing arrangement? Select which best applies: Yes , No or Not Applicable . This question is only applicable if the entity outsources any activities.

1.11.4 421 In total, how many services does the entity outsource from either third parties, or within its group or subsidiaries, during the reporting period? Enter the total number of services the entity outsources from either third parties, or within the entity s group or subsidiaries.

1.11.5 422 Does the outsourcing agreement clearly set out the obligations of both parties? Select which best applies: Yes , No or Not Applicable . This question is only applicable if the entity outsources any activities.

1.11.6 423 If relevant, does the outsourcing agreement require OSP to file a SAR with the FRA in cases of identified suspicious activity? Select which best applies: Yes , No or Not Applicable . This question is only applicable if the entity outsources any activities.

1.11.7 424 If relevant, is there a contingency plan in the event the Outsourcing service provider fails to perform the outsourced activity? Select which best applies: Yes , No or Not Applicable . This question is only applicable if the entity outsources any activities.

1.11.8 425 If relevant, does the regulated entity have timely access to all documents relevant to the outsourced activity maintained by the Outsourced service provider? Select which best applies: Yes , No or Not Applicable . This question is only applicable if the entity outsources any activities.

1.11.9 426 If relevant, does the outsourced AMLCO/MLRO have access to the entity s board? Select which best applies: Yes , No or Not Applicable .
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This question is only applicable if the entity outsources any activities.

1.11.10 427 If relevant, are there policies and procedures to ensure data protection restrictions would NOT delay access to data and documents? Select which best applies: Yes , No or Not Applicable . This question is only applicable if the entity outsources any activities.

1.11.11 428 Is sub-contracting of any of the outsourced activities permitted? Select which best applies: Yes , No or Not Applicable . This question is only applicable if the entity outsources any activities.

1.11.12 429 How do you ensure the OSP follows the outsourcing standards equivalent to the licensee's? Provide a narrative explaining how the entity ensures the OSP follows the outsourcing standards equivalent to that of the entity.

1.11.13 430 Does the entity conduct testing to ensure the outsourced service provider complies with record keeping requirements? Select which best applies: Yes , No or Not Applicable . This question is only applicable if the entity outsources any activities.

1.12.1 431 Do you have any comments or feedback for this tab? Please answer Yes or No .

1.12.2 432 Please use this area to provide any comments or feedback for this tab. Provide any comments or feedback for this tab. Enter 'N/A' if no comment.