



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.

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| 14 December 2022 | 1.1 | Update to guidance for products and services questions. | | | | |
| 31 July 2023 | 1.2 | Updates to definitions, descriptions, explanations and questions. | | | | |
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Version: 1.3 AML Survey Completion Guide Insurance Page 3 of 64 Contents

| | |
|-------------------------------------------|----|
| 1 Introduction | 4 |
| 2 Form Information | 4 |
| 3 Accessing and Submitting the AML Survey | 3 |
| 3.1 Access to the AML Survey | 4 |
| 3.2 Completing the AML Survey Form | 10 |
| 4 Other Useful Information | 11 |
| 4.1 User account lockouts | 11 |
| 4.2 Internet Browser | 11 |
| 4.3 Data and Security | 11 |
| 4.4 Applicable Fees | 11 |
| 5 AML Survey Guidance | 11 |

1 INTRODUCTION The Cayman Monetary Regulatory Authority International (the Authority) periodically undertakes sectoral ML/TF/PF and Sanctions 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 (the AMLD). The AML Survey Form is issued in accordance with section 22(1)(b) of the Insurance Act, 2010. This Guide provides support to FSPs which carry out insurance business, in accessing, completion and submission of the AML Survey Insurance.

2 FORM INFORMATION The AML Survey Insurance is to be completed by each FSP holding an Insurance licence, who are commonly referred to as Entity for purposes of this form. The AML Survey Insurance is made up of two (2) sections for collecting AML risk data; the AML Inherent Risks and 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 activation, 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, AML Officers of the

Insurance Manager and other principal contacts. If an Entity is unsure of what their contact details are or to add additional contacts, they can contact the Authority at .

To access the AML Survey: Version: 1.3 AML Survey Completion Guide Insurance Page 5 of 64

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 Insurance Page 6 of 64
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. Version: 1.3 AML Survey Completion Guide Insurance Page 7 of 64
5. The user should then click on the Return To Home button. Version: 1.3 AML Survey Completion Guide Insurance Page 8 of 64
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 Insurance Page 9 of 64
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. Version: 1.3 AML Survey Completion Guide Insurance Page 10 of 64

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.
 - 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. If an Entity submits an Incomplete AML Survey, they are 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 see the additional survey(s) in the Current User section of the web page. At the top of the page, where it shows the Entity's 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 were 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 Insurance Page 11 of 64

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; locked out for ten (10) minutes; and, 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-premise 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 Insurance Page 12 of 64

5 AML SURVEY GUIDANCE Below are descriptions and explanations to the risk factors and controls factors you are required to provide information about. 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 Factors Descriptions Terms/Abbreviations Definition/Meaning

AMLRs Anti-Money Laundering Regulations, (2023 Revision), as amended. AMLCO Anti-Money Laundering Compliance Officer BO Beneficial Owner (or UBO) (as defined in Regulation 2 of the Anti-Money Laundering Regulations (as revised)) means 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 (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. 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. This includes both Natural Persons and Legal Persons and Arrangement Clients. Corporate Entity A corporate body 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\$). Version: 1.3 AML Survey Completion Guide Insurance Page 13 of 64 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 buyers and sellers in the secondary and scrap markets. DMLRO Deputy Money Laundering Reporting Officer 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. Entity For the purposes of this form/survey, an entity is the holder of an Insurance licence that is responding to this survey. F2F The face-to-face engagement with a client directly, with the natural person physically present. The engagement will not be via , , online, etc. Foundation This definition refers to Cayman Islands foundation companies that are governed by the Companies Act (Revised), except to the extent that it is modified by the Foundation company 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 individuals (HNWI) is: Version: 1.3 AML Survey Completion Guide Insurance Page 14 of 64 (i) an individual whose net worth is at least C\$800,000 (approx. US\$1,000,000) or its equivalent in any other currency; or (ii) any person that has total assets of not less than C\$4,000,000 (approx. US\$5,000,000) or its equivalent in any other currency. 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. Individual A Natural Person that is not a Legal Person or Legal Arrangement. Legal Person A company or other entity created by operation of law with separate legal personality. Legal Arrangement A trust or partnership, or other entity created between parties which lacks separate legal personality. MLRO Money Laundering Reporting Officer ML/TF/PF Money Laundering/Terrorism Financing/Proliferation Financing. Mutual Fund A company, unit trust or partnership that issues equity interests, the purpose or effect of which is the pooling of investor funds with the aim of spreading investment risks and enabling investors in the mutual fund to receive profits or gains from the acquisition, holding, management or disposal of investments but does not include a person licensed under the Banks and Trust Companies Act (2021 Revision) or the Insurance Act, 2010, or a person registered under

the Building Societies Act (2020 Revision) or the Friendly Societies Act (1998 Revision).

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 the 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 Or Non-F2F, 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.

NPO A legal person or arrangement that primarily engages in raising or disbursing funds for purposes such as charitable religious, cultural, educational, social or fraternal purposes, or for the carrying out of other types of good works.

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) 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.
- b) 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;
- c) 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:

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

Reporting Period January 1 through December 31, 2023, and future calendar years thereafter.

Source of Funds 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.

Special Economic Zone Business 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 (TFS) 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).

TCSP Includes those entities conducting Trust, Company Manager, and Corporate Service Provider business.

Transaction For the purposes of this survey, a transaction is the movement of assets, whether it be between the client and the entity, the client account and a third party, or the entity on behalf of the client. Fees paid from an external source, other than the client account held by the entity, should be reported as a transaction. Fees paid from client accounts, held by the entity, along with payments made to governments for taxes associated to securities trades should be excluded from the

definition. Trust 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. Version: 1.3 AML Survey Completion Guide Insurance Page 17 of 64 Ultra HNWI's Ultra-High Net Worth Individuals, also referred to as UHNWI, are all HNWI's 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 Assets Products and Services Includes those services identified within the Virtual Asset (Service Providers) Act (2022 Revision), or as amended, as well as products which include any digital representation of value that can be digitally traded, transferred or used for payment. Timeframe Assets Under Management Value of AUM as at the end of the reporting period. Timeframe Number of Clients Number of clients as at the end of the reporting period. Timeframe Number of Transactions Number of Transactions conducted for the client during the reporting period.

AML Inherent Risk Questions: Ref. No. Question No. Question Description/Explanation 1.1.1 1 Total Clients / Customers. Enter the total number of clients. This will include all customers on the entity's client list at the end of the reporting period. This number should include all clients the entity provides financial products and services. Total clients consist of natural persons and legal persons and arrangements. 1.1.2 2 Total Transactions for the reporting period. Enter the total number of all transactions conducted for clients during the reporting period. Version: 1.3 AML Survey Completion Guide Insurance Page 18 of 64 1.1.3 3 Total Value of Business. Enter the total Value of Premiums/ Fees/ Commissions collected during the reporting period. Insurance Company - Premiums collected including, for long term investment contracts, include the total assets under management at the end of the reporting period. Insurance Manager - Management Fees Insurance Agent - Fees and Commissions Insurance Broker - Fees and Commissions 1.1.4 4 Total number of PEPs. Enter the total number of PEPs, by nationality of the PEP, as at the end of the reporting period. Total PEPs should include, but may not be limited to, those who are clients that are Natural Persons, BOs, Directors, Investors, Promoters, or hold any other form of control, including signatories. 1.1.5 5 Total number of High Risk Clients. Enter the total number of clients / customers that are high risk, at the end of the reporting period. 1.1.6 6 Total number of Non- Compliant Accounts at the end of the reporting period. Enter the number of customer accounts that remain non-compliant with required identification and verification procedures. 1.1.7 7 Total value of client/ policyholder assets, by geographic location of the assets, at the end of the reporting period. Enter the total value of client/ policyholder assets, by the geographic location where the assets of the client / policyholder assets are custodied, at the end of the reporting period. 1.2.1 8 Does the entity have any clients that are Legal Persons or Arrangements? Please answer Yes or No . 1.2.2 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 as at the end of the reporting period. If an entity does not have such clients, a 0 value should be used. 1.2.3 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. Version: 1.3 AML Survey Completion Guide Insurance Page 19 of 64 1.2.4 11 Value of Business - Legal Persons and Arrangements. Enter the total Value of Premiums / Commissions / Fees for clients who are Legal Persons

or Arrangements, as at the end of the reporting period. 1.2.5 12 Total number of BOs by country of nationality of the BO. Enter the total number of BOs of all clients who are Legal Persons or Arrangements, broken down by the nationality of the BO. 1.2.6 13 Does the entity have any clients that have BOs that are directors of the client? Please answer Yes or No . 1.2.7 14 Number of clients which have BOs that are directors of the client. Enter the total number of clients which have BOs that are also directors of the client. 1.2.8 15 Does the entity have any clients that have BOs that are Controllers of the client? Please answer Yes or No . 1.2.9 16 Number of clients which have BOs that are Controllers of the client. Enter the total number of clients whose BOs are also Controllers of the client. 1.2.10 17 Does the entity have any clients that have BOs that are also senior managing officials of the client? Please answer Yes or No . 1.2.11 18 Number of clients which have BOs that are also senior managing officials of the client. Enter the total number of clients whose BOs are also senior managing officials of the client. Senior managers are individuals at the highest level of organizational management, who have the day-to-day responsibilities of managing a company or corporation. They hold specific executive powers conferred onto them by the board of directors and/or the shareholders. If an entity does not have such clients, a 0 value should be used. 1.2.12 19 Does the entity have any clients which have BOs - HNWI's? Please answer Yes or No . 1.2.13 20 Number of Clients which have BOs - HNWI's. Enter the total number of clients who have BOs that are HNWI's. HNWI's is specific to those persons whose net worth is at least CI\$800,000 (approx. US\$1,000,000) and/or those Version: 1.3 AML Survey Completion Guide Insurance Page 20 of 64 assets valued at least CI\$4,000,000 (approx. US\$5,000,000). If the entity does not have any clients that fit this category record a 0 1.2.14 21 Does the entity have any clients which have BOs - Ultra HNWI's? Please answer Yes or No . UHNWI's is specific to those persons whose net worth is equal to or greater than US\$30,000,000. 1.2.15 22 Number of Clients which have BOs - Ultra HNWI's. Enter the total number of clients who have BOs that are Ultra HNWI's. If the entity does not have any clients that fit this category record a 0 . 1.2.16 23 Does the entity have any clients which have BOs which are PEPs? Please answer Yes or No . 1.2.17 24 Number of BOs of clients which are PEPs, broken down by nationality of the PEP. Enter the total number of clients who have BOs that are PEPs, broken down by nationality of the PEP. 1.2.18 25 Does the entity have any clients which have Nominees acting on behalf of a BO? Please answer Yes or No . 1.2.19 26 Number of clients which have Nominees appointed acting on behalf of a BO, broken down by nationality of the BO. Enter the total number of clients which have nominees acting on behalf of BOs, broken down by the nationality of the BO. 1.3.1 27 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 which have nominees appointed on behalf of a director, broken down by the nationality of the director. 1.3.2 28 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 PEPs, broken down by nationality of the director / senior management. 1.3.3 29 Number of directors and/or senior management of clients Enter the number of directors and/or senior management of the clients who are HNWI's. Version: 1.3 AML Survey Completion Guide Insurance Page 21 of 64 who are High Net Worth Individuals. 1.3.4 30 Number of directors and/or senior management of clients who are Ultra High Net Worth Individuals. Enter the number of directors and/or senior management of the clients who are Ultra HNWI's. Individuals whose net worth is greater than or equal to US\$30,000,000. 1.3.5 31

Number of directors and/or senior management of clients who are PEPs & HNWI/ Ultra HNWI. Enter the number of directors and/or senior management of the clients who are both PEPs and HNWI/ Ultra HNWI, as at the end of the reporting period. 1.4.1 32 Does the entity have any clients that are Gov / Pub Sector? Please answer Yes or No . 1.4.2 33 Gov / Pub Sector - Number of Clients, broken down by country of the government jurisdiction. Enter the number of clients that the entity has, as at the end of the reporting period, that are a Government or Public Sector, broken down by government jurisdiction. 1.4.3 34 Gov / Pub Sector - Number of Transactions. Enter the number of transactions conducted by clients that are Government or Public Sector during the reporting period. 1.4.4 35 Gov / Pub Sector - Value of Business for the reporting period. Enter the Value of Premiums / Commissions / Fees collected for the reporting period, for clients that are government or public sector. 1.4.5 36 Does the entity have any clients that are NPOs? Please answer Yes or No . 1.4.6 37 NPO - Number of Clients. Enter the number of clients the entity has, as at the end of the reporting period, that are NPOs. 1.4.7 38 NPO - Number of Transactions. Enter the number of transactions conducted by clients that are NPOs during the reporting period, broken down by country of incorporation. 1.4.8 39 NPOs - Value of Business for the reporting period. Enter the Value of premiums / commissions / fees collected during the reporting period, of clients that are NPOs. 1.4.9 40 Does the entity have any clients that are Foundations? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Insurance Page 22 of 64 Answer Yes if the entity has clients that have a Foundation within its structure. Note that one client can fall under multiple categories within this Structure section. 1.4.10 41 Foundations - Number of Clients, broken down by the country of establishment of the client. Enter the number of clients the entity has for this category. 1.4.11 42 Foundations - Number of Transactions. Enter the number of transactions conducted by clients for this category during the reporting period. 1.4.12 43 Foundations - Value of Business for the reporting period. Enter the Value of Premiums / Commissions / Fees collected from clients that are a Foundation, as at the end of the reporting period. 1.4.13 44 Does the entity have any clients that are Trusts? Please answer Yes or No . Answer Yes if the entity has clients that have a Trust within its structure. Note that one client can fall under multiple categories within this Structure section. 1.4.14 45 Trusts - Number of Clients, broken down by country of formation of the client. Enter the number of clients the entity has, as at the end of the reporting period, for this category. 1.4.15 46 Trusts - Number of Transactions. Enter the number of transactions conducted by clients for this category during the reporting period. 1.4.16 47 Trusts - Value of Business for the reporting period. Enter the Value of Premiums / Commissions / Fees collected for the reporting period, for clients that are Trusts. 1.4.17 48 Does the entity have any clients that are Segregated Portfolio Companies? Please answer Yes or No . Answer Yes if the entity has any clients which have a Segregated Portfolio Company within their structure. Note that one client can fall under multiple categories within this Structure section. 1.4.18 49 Segregated Portfolio Companies - Number of Clients. Enter the number of clients the entity has, as at the end of the reporting period, for this category. Version: 1.3 AML Survey Completion Guide Insurance Page 23 of 64 1.4.19 50 Segregated Portfolio Companies - Number of Transactions. Enter the number of transactions conducted by clients, for this category, during the reporting period. 1.4.20 51 Segregated Portfolio Companies - Value of business collected for the reporting period. Enter the Value of Premiums / Commissions / Fees collected for the reporting period. 1.4.21 52 Does the entity have any clients that are from Special Economic Zone? Please answer Yes or No . Answer Yes if the entity has

any clients which are a member of a Special Economic Zone. Note that one client can fall under multiple categories within this Structure section.

1.4.22 53 Special Economic Zone - Number of Clients. Enter the number of clients the entity has, as at the end of the reporting period, for this category.

1.4.23 54 Special Economic Zone - Number of Transactions. Enter the number of transactions conducted by clients, for this category, during the reporting period.

1.4.24 55 Special Economic Zone - Value of Business for the reporting period. Enter the Value of Premiums / Commissions / Fees collected for the reporting period.

1.5.1 56 Does the entity have any clients that are Natural Persons? Please answer Yes or No. This question does not apply to clients who are Legal Persons or Arrangements.

1.5.2 57 Clients / customers that are Natural Persons, broken down by Nationality of the client. Enter the number of clients that are natural persons, broken down by their nationality, at the end of the reporting period. If an entity does not have such clients, a 0 value should be used. Note: This category does not include clients/ customers that are Legal Persons and Arrangements.

1.5.3 58 Clients/customers that are Natural Persons, broken down by Residency of the client. Enter the number of clients that are natural persons, broken down by their residency. This category is specific to clients who are natural persons who have a direct business relationship with the entity. Version: 1.3 AML Survey Completion Guide Insurance Page 24 of 64 If an entity does not have such clients, a 0 value should be used. Note: This category does not include clients/ customers that are Legal Persons and Arrangements.

1.5.4 59 Natural Persons - Total Transactions for the reporting period. 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 who have a direct business relationship with the entity. If an entity does not have such clients, a 0 value should be used. Note: This category does not include clients / customers that are Legal Persons and Arrangements.

1.5.5 60 Value of Business - Natural Persons. Enter the total value of Premiums / Commissions / Fees earned for clients that are Natural Persons as at the end of the reporting period.

1.5.6 61 Natural Person Clients - Does the entity have any clients that are PEPs? Please answer Yes or No. This question does not apply to clients who are Legal Persons or Arrangements.

1.5.7 62 Number of Natural Person clients who are PEPs, broken down by the nationality of the client. Enter the total number of Natural Person clients that are PEPs, broken down by the nationality of the client. This question does not apply to clients who are Legal Persons or Arrangements.

1.5.8 63 Natural Persons - PEPs - Number of Transactions. Enter the number of transactions conducted by Natural Person clients that are PEPs, during the reporting period.

1.5.9 64 Does the entity have any Natural Person clients that are HNWIs? Please answer Yes or No. This question does not apply to clients who are Legal Persons or Arrangements. This category does NOT include those individuals who are Ultra HNWIs.

1.5.10 65 Number of Natural Person clients who are HNWIs. Enter the number of Natural Person clients the entity has that are HNWIs. Version: 1.3 AML Survey Completion Guide Insurance Page 25 of 64

1.5.11 66 Natural Person Clients - HNWIs - Number of Transactions. Enter the number of transactions conducted by Natural Person clients, who are HNWIs, during the reporting period.

1.5.12 67 Does the entity have any Natural Person clients that are Ultra HNWIs? Please answer Yes or No. Individuals whose net worth is equal to or greater than US\$30,000,000.

1.5.13 68 Number of Natural Person clients who are Ultra HNWIs. Enter the number of Natural Person clients the entity has that are Ultra- HNWIs at the end of the reporting period.

1.5.14 69 Natural Person Clients - Ultra HNWIs- Number of Transactions. Enter the number of transactions conducted by Natural Person clients, who are Ultra

HNWIs, during the reporting period. 1.5.15 70 Does the entity have any Natural Person clients that are PEPs and HNWIs /Ultra HNWIs? Please answer Yes or No . 1.5.16 71 Number of Natural Person clients who are PEPs and HNWIs / Ultra HNWIs. Enter the number of Natural Person clients the entity has that are both PEPs and HNWIs / Ultra HNWIs, at the end of the reporting period. 1.5.17 72 Natural Person Clients - PEPs and HNWIs / UHNWIs - Number of Transactions. Enter the number of transactions conducted on behalf of Natural Person clients, who are both PEPs and HNWIs/Ultra HNWIs, during the reporting period. 1.6.1 73 Total Number of Beneficiaries, Natural and Legal Persons. Enter the Total Number of Beneficiaries, for clients that are Natural and Legal Persons. 1.6.2 74 Number of Beneficiaries Clients that are Natural Persons. Enter the Number of Beneficiaries for Clients that are Natural Persons. 1.6.3 75 Number of Beneficiaries Clients that are Corporations. Enter the Number of Beneficiaries for Clients that are Corporations. 1.6.4 76 Number of Beneficiaries Clients that are Corporate Group Structures. Enter the Number of Beneficiaries for Clients that are Corporate Group Structures. Version: 1.3 AML Survey Completion Guide Insurance Page 26 of 64 1.6.5 77 Number of Beneficiaries Clients that are Government / State owned entities, broken down by government jurisdiction of the Beneficiary. Enter the Number of Beneficiaries for Clients that are Government / State owned entities, broken down by government jurisdiction of the Beneficiary. 1.6.6 78 Number of Beneficiaries Clients that are NPOs. Enter the Number of Beneficiaries for Clients that are NPOs. 1.6.7 79 Number of Beneficiaries Clients that are Trusts. Enter the Number of Beneficiaries for Clients that are Trusts. 1.6.8 80 Number of Beneficiaries Clients that are Foundations. Enter the Number of Beneficiaries for Clients that are Foundations. 1.6.9 81 Number of Beneficiaries Clients that are PEPs, broken down by nationality of the Beneficiary. Enter the Number of Beneficiaries for Clients that are PEPs, broken down by nationality of the Beneficiary. 1.7.1 82 Nature of Business / Source of Funding: Please provide the total number of clients that are legal persons or arrangements of, or natural persons employed in, the following sectors: Banking Institutions exc. MSBs Other Financial regulated Business* Financial Leasing Money Lending Accountants Fintech *excluding MSBs, Virtual Assets Products and Services and TCSPs. Enter the total number of clients which fall within the list of sectors as at the end of the reporting period. 1.7.2 83 Does the entity have any clients that are legal persons or arrangements, operating as Banking Institutions (excluding MSBs), or natural persons that are employed by Banking Institutions (excluding MSBs)? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Insurance Page 27 of 64 1.7.3 84 Banking Institutions (excluding MSBs) - Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements and are Banking Institutions (excluding MSBs), or natural persons that are employed by Banking Institutions (excluding MSBs). 1.7.4 85 Does the entity have any clients that are legal persons or arrangements operating as Other Financial Regulated Businesses, or natural persons employed by Other Financial Regulated Businesses not listed in this section? Please answer Yes or No . 1.7.5 86 Other Financial Regulated Business - Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements operating as Other Financial Regulated Business or natural persons that are employed by Other Financial Regulated Businesses not mentioned above. 1.7.6 87 Does the entity have any clients that are legal persons or arrangements operating in Financial Leasing, or natural persons employed by Financial Leasing? Please answer Yes or No . 1.7.7 88 Financial Leasing- Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements operating as Financial Leasing

companies or natural persons that are employed by Financial Leasing companies. 1.7.8 89 Does the entity have any clients that are legal persons or arrangements operating as Money Lending, or natural persons employed by Money Lending? Please answer Yes or No . 1.7.9 90 Money Lending - Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements operating as Money Lending institutions, and / or natural persons that are employed by Money Lending institutions. Version: 1.3 AML Survey Completion Guide Insurance Page 28 of 64 1.7.10 91 Does the entity have any clients that are legal persons or arrangements operating as Accountants (Audit / Assurance / Bookkeeping / Insolvency), or natural persons employed as Accountants? Please answer Yes or No . 1.7.11 92 Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements operating as Accountants (Audit / Assurance / Bookkeeping / Insolvency), and/ or natural persons that are employed by Accountants (Audit / Assurance / Bookkeeping / Insolvency). 1.7.12 93 Does the entity have any clients that are legal persons or arrangements operating in the Fintech industry, or natural persons employed in the Fintech industry? Please answer Yes or No . 1.7.13 94 Fintech - Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements operating in the Fintech industry, and natural persons that are employed by institutions in the Fintech industry. 1.7.14 95 Nature of Business / Source of Funding: Please provide the total number of clients that are legal persons or arrangements of, or natural persons employed in, the following sectors: Legal Practitioners Dealers in Precious Metals and Stones Money Services Business (MSBs) Virtual Asset Products and Services High Value Dealers Import/Export Industry Shipping and Transport of Goods Enter the total number of clients which fall within the list of sectors, as at the end of the reporting period. Version: 1.3 AML Survey Completion Guide Insurance Page 29 of 64 1.7.15 96 Does the entity have any clients that are legal persons or arrangements operating as Legal Practitioners, or natural persons employed as Legal Practitioner? Please answer Yes or No 1.7.16 97 Legal Practitioners Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements operating as Legal Practitioners, and natural persons that are employed by a Legal Practitioner. 1.7.17 98 Does the entity have any clients that are legal persons or arrangements operating as Dealers in Precious Metals and Stones, or natural persons employed by Dealers in Precious Metals and Stones? Please answer Yes or No 1.7.18 99 Dealers in Precious Metals and Stones Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements operating as Dealers in Precious Metals and Stones, and natural persons that are employed by Dealers in Precious Metals and Stones. 1.7.19 100 Does the entity have any clients that are legal persons or arrangements operating as Money Services Businesses, or natural persons that are employed by Money Services Businesses? Please answer Yes or No . 1.7.20 101 Money Services Business - Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements operating in the Money Services Business, and / or are natural persons that are employed in the Money Services Business. 1.7.21 102 Does the entity have any clients that are legal persons or arrangements offering Virtual Asset products or services or natural persons employed by or earning income from Virtual Asset products or services? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Insurance Page 30 of 64 1.7.22 103 Virtual Asset Products and Services - Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements offering virtual assets products and services, and natural persons that are

employed by institutions which offer virtual assets products and services. 1.7.23 104 Does the entity have any clients that are legal persons or arrangements operating as High Value Dealers or natural persons employed by High Value Dealers? Please answer Yes or No .

1.7.24 105 High Value Dealers - Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements operating as High Value Dealers, and natural persons that are employed by High Value Dealers. 1.7.25 106 Does the entity have any clients that are legal persons or arrangements operating as TCSPs, or natural persons employed by TCSPs? Please answer Yes or No . 1.7.26 107 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 a TCSP, and natural persons that are employed by TCSPs. 1.7.27 108 Does the entity have any clients that are legal persons or arrangements operating in the Import / Export Industry, or natural persons employed by the Import / Export Industry? Please answer Yes or No . 1.7.28 109 Import / Export - Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements operating in the Import / Export business, and natural persons that are employed in the Import / Export industry. 1.7.29 110 Does the entity have any clients that are legal persons or arrangements 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 . Version: 1.3 AML Survey Completion Guide Insurance Page 31 of 64

1.7.30 111 Shipping and Transport of Goods - Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements operating in the Shipping and Transport of Goods business, and natural persons that are employed within the Shipping and Transport of Goods industry. 1.7.31 112 Nature of Business / Source of Funding: Please provide the total number of clients that are legal persons or arrangements 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 which fall within the list of sectors, broken down by nationality or country of incorporation / formation of the clients, as at the end of the reporting period. 1.7.32 113 Does the entity have any clients that are legal persons or arrangements operating as Real Estate Agents / Brokers, or natural persons employed as Real Estate Agents / Brokers? Please answer Yes or No . 1.7.33 114 Real Estate Agents / Brokers - Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements operating as Real Estate Agents / Brokers, and natural persons that are employed by Real Estate Agents / Brokers. 1.7.34 115 Does the entity have any clients that are legal persons or arrangements operating in the Gambling business (including online gambling), or natural persons employed or earning income in the Gambling business? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Insurance Page 32 of 64

1.7.35 116 Gambling business (including online gambling) - Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements operating in the Gambling business (including online gambling), and natural persons that are employed in the Gambling business (including online gambling). 1.7.36 117 Does the entity have any clients that are legal persons or arrangements operating in the Adult Entertainment industry, or natural persons employed or earning income in the Adult Entertainment industry? Please answer Yes or No . 1.7.37 118 Adult Entertainment - Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements operating in the Adult Entertainment Industry, and natural persons that are

employed in the Adult Entertainment Industry. 1.7.38 119 Does the entity have any clients that are legal persons or arrangements operating in the Defence Industry, or natural persons employed by the Defence Industry? Please answer Yes or No . 1.7.39 120 Defence Industry - Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements operating in the Defence Industry, and natural persons that are employed in the Defence Industry. 1.7.40 121 Does the entity have any clients that are legal persons or arrangements operating in the Oil and Gas Industry, or natural persons employed by the Oil and Gas Industry? Please answer Yes or No . 1.7.41 122 Oil and Gas Industry - Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements operating in the Oil and Gas Industry, and natural persons that are employed in the Oil and Gas Industry. Version: 1.3 AML Survey Completion Guide Insurance Page 33 of 64 1.7.42 123 Does the entity have any clients that are legal persons or arrangements operating in the Mining Industry, or natural persons employed by the Mining Industry? Please answer Yes or No . 1.7.43 124 Mining Industry - Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements operating in the Mining Industry, and natural persons that are employed in the Mining Industry. 1.7.44 125 Does the entity have any clients that are legal persons or arrangements operating in the Construction / Development industry, or natural persons employed in the Construction / Development industry? Please answer Yes or No . 1.7.45 126 Construction / Development - Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements operating in the Construction / Development industry, and natural persons that are employed in the Construction / Development industry. 1.7.46 127 Does the entity have any clients that are legal persons or arrangements operating in the Retail & Restaurant Business, or natural persons employed in the Retail & Restaurant Business? Please answer Yes or No . 1.7.47 128 Retail & Restaurant Business - Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements operating in the Retail & Restaurant Business, and natural persons that are employed in the Retail & Restaurant Business. 1.7.48 129 Does the entity have any clients that are legal persons or arrangements operating in the Cannabis Production & Distribution industry, or natural persons employed in the Cannabis Production & Distribution industry? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Insurance Page 34 of 64 1.7.49 130 Cannabis Production & Distribution - Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements operating in Cannabis Production & Distribution Business, and natural persons that are employed in the Cannabis Production & Distribution industry. 1.7.50 131 Does the entity have any clients that are legal persons or arrangements of Unknown Businesses, or natural persons employed in Unknown Professions or Industries? Please answer Yes or No . 1.7.51 132 Unknown Businesses and Professions - Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements of Unknown Businesses and Professions, and natural persons that are employed in Unknown Businesses and Professions. Unknown business and profession is where the entity does not know, was not provided with, and was unable to verify the nature of business or profession (source of funds) of the client. 1.7.52 133 Does the entity have any clients where the nature of business / Source of Funding is not listed in a category above? Please answer Yes or No . 1.7.53 134 Other - Not mentioned above - Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements operating in known businesses, not mentioned above, or natural persons that are employed in known

businesses/industries, not mentioned above. 1.8.1 135 Source of Funds Value of Client Assets. Please provide the total value of client assets for clients that are legal persons or arrangements of, or are natural persons employed in, the following sectors: Banking Institutions Enter the total value of client assets under management, of the clients that are legal persons or arrangements operating as, and natural persons employed in the listed sectors. If there are no client assets under management, please record 0. Version: 1.3 AML Survey Completion Guide Insurance Page 35 of 64 Other Financial regulated Business* Financial Leasing Money Lending Accountants Fintech *excluding MSBs, Virtual Asset Products and Services, Trusts, Company Managers, or Corporate Service Providers. 1.8.2 136 Banking Institutions (excluding MSBs) - Value of Client Assets. Enter the value of client assets under management, of clients that are legal persons or arrangements operating as Banking Institutions (excluding MSBs), and natural persons that are employed in Banking Institutions (excluding MSBs). 1.8.3 137 Other Financial Regulated Business - Value of Client Assets. Enter the value of client assets under management, of the clients that are legal persons or arrangements operating as Other Financial Regulated Business, not already mentioned in this section, and natural persons that are employed in these Other Financial Regulated Business. 1.8.4 138 Financial Leasing - Value of Client Assets. Enter the value of client assets under management, of the clients that are legal persons or arrangements operating in the Financial Leasing business, and natural persons that are employed in the Financial Leasing business. 1.8.5 139 Money Lending- Value of Client Assets. Enter the value of client assets under management, of the clients that are legal persons or arrangements operating in the Money Lending business, and natural persons that are employed by Money Lending businesses. 1.8.6 140 Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Value of Client Assets. Enter the value of client assets under management, of the clients that are legal persons or arrangements operating as Accountants (Audit / Assurance / Bookkeeping / Insolvency), and natural persons that are employed by Accountants (Audit / Assurance / Bookkeeping / Insolvency). Version: 1.3 AML Survey Completion Guide Insurance Page 36 of 64 1.8.7 141 Fintech - Value of Client Assets. Enter the value of client assets under management, of the clients that are legal persons or arrangements operating in the Fintech industry, and natural persons that are employed in the Fintech industry. 1.8.8 142 Source of Funds Value of Client Assets. Please provide the total value of client assets under management, from clients that are legal persons or arrangements of, or are natural persons employed in the following sector: Legal Practitioners Dealers in Precious Metals and Stones MSBs Virtual Asset Products and Services High Value Dealers Trusts, Company Managers or Corporate Service Providers Import/Export Industry Shipping and Transport of Goods Enter the total value of client assets under management, of the clients that are legal persons or arrangements of, and are natural persons employed in the listed sectors. 1.8.9 143 Legal Practitioners Value of Client Assets. Enter the value of client assets under management, of the clients that are legal persons or arrangements operating as Legal Practitioners, and natural persons that are employed by Legal Practitioners. 1.8.10 144 Dealers in Precious Metals and Stones- Value of Client Assets. Enter the value of client assets under management, of clients that are legal persons or arrangements operating as Dealers in Precious Metals and Stones, and natural persons that are employed by Dealers in Precious Metals and Stones. 1.8.11 145 Money Services Business - Value of Client Assets. Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Money Services Business, and natural persons that are

employed in the Money Services Business. Version: 1.3 AML Survey Completion Guide Insurance Page 37 of 64 1.8.12 146 Virtual Asset Products and Services - Value of Client Assets. Enter the value of client assets under management, of clients that are legal persons or arrangements offering virtual asset products and services, and natural persons that are employed by providers or earning income through virtual asset products and services.

1.8.13 147 High Value Dealers - Value of Client Assets. Enter the value of client assets under management, of clients that are legal persons or arrangements operating as High Value Dealers, and natural persons that are employed by High Value Dealers. 1.8.14 148 Trusts, Company Managers and Corporate Service Providers - Value of Client Assets.

Enter the value of client assets under management, of clients that are legal persons or arrangements operating as TCSPs, and natural persons that are employed by TCSPs.

1.8.15 149 Import / Export Industry Value of Client Assets. Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Import / Export Industry, and natural persons that are employed by the Import / Export Industry. 1.8.16 150 Shipping and Transport of Goods - Value of Client Assets.

Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Shipping and Transport of Goods, and natural persons that are employed by the Shipping and Transport Industry. 1.8.17 151 Source of Funds Value of Client Assets

Please provide the total value of client assets under management from clients that are legal persons or arrangements of, or are natural persons employed in, the following sector:

Real Estate Agents/Brokers Gambling Business Adult Entertainment Industry Defence Industry Oil and Gas Industry Mining Enter the total value of client assets under management, of the clients that are legal persons or arrangements of, and are natural persons employed in the listed sectors. Version: 1.3 AML Survey Completion Guide Insurance Page 38 of 64

Construction / Development Retail / Restaurant Cannabis Industry 1.8.18 152 Real Estate Agents / Brokers - Value of Client Assets. Enter the value of client assets under management, of clients that are legal persons or arrangements

operating as Real Estate Agents / Brokers, and natural persons that are employed by Real Estate Agents / Brokers. 1.8.19 153 Gambling Business (including online gambling) - Value of Client Assets. Enter the value of client assets under management, of clients that are legal persons or arrangements operating in Gambling business (including online gambling), and natural persons that are employed in, or earning income, in the Gambling business (including online gambling). 1.8.20 154 Adult Entertainment - Value of Client Assets.

Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Adult Entertainment business, and natural persons that are employed in the Adult Entertainment business. 1.8.21 155 Defence Industry - Value of Client Assets. Enter the value of assets under management, of clients that are legal persons or arrangements operating in the Defence Industry, and natural persons that are employed in the Defence Industry. 1.8.22 156 Oil and Gas Industry - Value of Client Assets.

Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Oil and Gas Industry, and natural persons that are employed in the Oil and Gas Industry. 1.8.23 157 Mining Industry - Value of Client Assets.

Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Mining Industry, and natural persons that are employed in the Mining Industry. 1.8.24 158 Construction / Development - Value of Client Assets.

Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Construction / Development business, and natural persons that are

Version: 1.3 AML Survey Completion Guide Insurance Page 39 of 64 employed in the Construction / Development industry. 1.8.25 159 Retail & Restaurant Business - Value of Client Assets. Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Retail & Restaurant Business, and natural persons that are employed in the Retail & Restaurant Business. 1.8.26 160 Cannabis Production & Distribution - Value of Client Assets. Enter the value of client assets under management, of clients that are legal persons or arrangements operating in the Cannabis Production & Distribution business, and natural persons that are employed in the Cannabis Production & Distribution business. 1.8.27 161 Industry / profession not known or not recorded - Value of Client Assets. Enter the value of client assets under management, of clients that are legal persons or arrangements operating in unknown or unrecorded Industries / Professions, and natural persons that are employed in unknown or unrecorded Industries / Professions. 1.8.28 162 Other - Not listed above - Value of Client Assets. Enter the value of client assets under management, of clients that are legal persons or arrangements operating in Known Businesses /industries/ Professions not listed above, and natural persons that are employed in Known Businesses / Industries / Professions, not listed above. 1.9.1 163 Do you have any comments or feedback for this tab? Please answer Yes or No . 1.9.2 164 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. Enter N/A if no comments. 2.1.1 165 Does the entity provide any products / services related to Professional Indemnity insurance? Please answer Yes or No . 2.1.2 166 Professional Indemnity Number of Clients, broken down by country of insured. Enter the number of clients the entity provides products related to Professional Indemnity, broken down by the country of the insured. Version: 1.3 AML Survey Completion Guide Insurance Page 40 of 64 2.1.3 167 Professional Indemnity - Value of Business. Enter the Value of Premiums / Commissions / Fees collected from clients provided products related to Professional Indemnity. 2.1.4 168 Does the entity provide any products / services related to Life & Annuity? Please answer Yes or No . 2.1.5 169 Life & Annuity - Number of Clients, broken down by country of insured. Enter the number of clients the entity provides products related to Life & Annuity, broken down by the country of the insured. This excludes Term Life policies. 2.1.6 170 Life & Annuity - Value of Business. Enter the Value of Premiums / Commissions / Fees collected for products related to Life & Annuity, which the entity provides to clients, as at the end of the reporting period. 2.1.7 171 Life & Annuity - Value of Policyholder Assets. Enter the Value of Policyholder Assets for products related to Life & Annuity, the entity provides to clients, as at the end of the reporting period. If the entity is not an insurance company or this question is not applicable enter 0 2.1.8 172 Life & Annuity Reinsurance Is all activity transacted for this line of business reinsurance coverage? Enter Yes or No Responding Yes means this business activity falls under reinsurance transactions by the entity. If less than 100% reinsurance include the percentage in the Feedback section. 2.1.9 173 Does your entity provide any products / services related to Collateralized Insurance? Please answer Yes or No . Includes those Class C insurer licences who are collateralised by funding sources which include the issuance of bonds or other instruments, contracts for differences and such other funding mechanisms which fall under investment products. 2.1.10 174 Collateralized Insurance Number of Clients, broken down by country of insured. Enter the number of clients the entity provides products related to Collateralized Insurance, broken down by the country of the insured. 2.1.11 175 Collateralized Insurance - Value of business. Enter the Value of

Premiums / Commissions / Fees from products related to Collateralized Insurance, Version: 1.3 AML Survey Completion Guide Insurance Page 41 of 64 which the entity provides to clients, as at the end of the reporting period. 2.1.12 176 Does your entity provide any products / services related to Long Term Disability, AD&D, Critical Illness years? Please answer Yes or No . 2.1.13 177 Long Term Disability, AD&D, Critical Illness years Number of Clients, broken down by country of insured. Enter the number of clients the entity provides products related to Long Term Disability, AD&D, Critical Illness years, broken down by the country of the insured. 2.1.14 178 Long Term Disability, AD&D, Critical Illness years Value of business. Enter the Value of Premiums / Commissions / Fees from products related to Long Term Disability, AD&D, Critical Illness years, which the entity provides to clients, as at the end of the reporting period. 2.1.15 179 Long Term Disability, AD&D, Critical Illness years Is all activity transacted for this line of business reinsurance? Enter Yes or No Responding Yes means this business activity falls under reinsurance transactions by the entity. If less than 100% reinsurance include the percentage in the Feedback section. 2.1.16 180 Does your entity provide any products / services related to Other Long-Term Health years? Please answer Yes or No . 2.1.17 181 Other Long-Term Health years Number of Clients, broken down by country of insured. Enter the number of clients the entity provides products related to Other Long-Term Health years, broken down by the country of the insured. 2.1.18 182 Other Long-Term Health years - Value of Business. Enter the Value of Premiums / Commissions / Fees from products related to Other Long-Term Health years, which the entity provides to clients, as at the end of the reporting period. 2.1.19 183 Other Long-Term Health years - Is all activity transacted for this line of business reinsurance? Enter Yes or No Responding Yes means this business activity falls under reinsurance transactions by the entity. Version: 1.3 AML Survey Completion Guide Insurance Page 42 of 64 If less than 100% reinsurance include the percentage in the Feedback section. 2.1.20 184 Does the entity provide any products / services related to Coverage of Market Outcome? Please answer Yes or No . 2.1.21 185 Coverage of Market Outcome Number of Clients, broken down by country of the insured. Enter the number of clients the entity provides products related to Coverage of Market Outcome, broken down by the country of the insured. 2.1.22 186 Coverage of Market Outcome - Value of business Enter the Value of Premiums / Commissions / Fees from products related to Coverage of Market Outcome, which the entity provides to clients, as at the end of the reporting period. 2.1.23 187 Does your entity provide any products / services related to Coverage of Legal Outcome? Please answer Yes or No . 2.1.24 188 Coverage of Legal Outcome Number of Clients, broken down by country of the insured. Enter the number of clients the entity provides products related to Coverage of Legal Outcome, broken down by the country of the insured. 2.1.25 189 Coverage of Legal Outcome - Value of Business Enter the Value of Premiums / Commissions / Fees from products related to Coverage of Legal Outcome, which the entity provides to clients, as at the end of the reporting period. 2.1.26 190 Does your entity provide any products / services related to Pension Coverage? Please answer Yes or No . 2.1.27 191 Pension Coverage- Number of Clients, broken down by country of the insured. Enter the number of clients the entity provides products related to Pension Coverage, broken down by the country of the insured. 2.1.28 192 Pension Coverage - Value of Business Enter the Value of Premiums / Commissions/ Fees from products related to Pension Coverage, which the entity provides to clients, as at the end of the reporting period. 2.1.29 193 Pension Coverage - Is all activity transacted for this line of business reinsurance? Enter Yes or No Responding Yes means this business activity falls under

reinsurance transactions by the entity. Version: 1.3 AML Survey Completion Guide Insurance Page 43 of 64

If less than 100% reinsurance include the percentage in the Feedback section.

2.1.30 194 Does your entity provide any products / services related to Hull Coverage? Please answer Yes or No .

2.1.31 195 Hull Coverage - Number of Clients, broken down by country of the insured. Enter the number of clients the entity provides products related to Hull Coverage, broken down by the country of the insured.

2.1.32 196 Hull Coverage - Value of Business Enter the Value of Premiums / Commissions / Fees from products related to Hull Coverage, which the entity provides to clients, as at the end of the reporting period.

2.1.33 197 Does your entity provide any products / services related to Aviation coverage? Please answer Yes or No .

2.1.34 198 Aviation Coverage - Number of Clients, broken down by country of the insured. Enter the number of clients the entity provides products related to Aviation Coverage, broken down by the country of the insured.

2.1.35 199 Aviation Coverage - Value of Business. Enter the Value of Premiums / Commissions / Fees from products related to Aviation Coverage, which the entity provides to clients, as at the end of the reporting period.

2.1.36 200 Does your entity provide any Products with Loan Features? Please answer Yes or No . Loans include promissory notes.

2.1.37 201 Loan Features - Number of active loans at the end of the reporting period, broken down by country of the borrower. Enter the number of active loans the entity processed for or on behalf of customers, related parties or third parties, broken down by the country of the insured.

2.1.38 202 Loan Features - Value of active loans Enter the value of loans issued by the entity, including for or on behalf of clients, for the reporting period.

2.1.39 203 Does your entity provide any products / services relating to Early Surrenders? Please answer Yes or No .

2.1.40 204 Early Surrenders - Number of clients, broken down by country of insured. Enter the number of clients the entity provides products related to Loan Features, broken down by the country of the insured.

2.1.41 205 Early Surrenders - Value of Surrenders for the reporting period. Enter the Value of Premiums / Commissions / Fees from products related to Early Surrenders, which the entity provides to clients, as at the end of the reporting period.

2.1.42 206 Does your entity provide any Other Long-Term Coverage insurance products / services not included in the above questions? Please answer Yes or No .

2.1.43 207 Other Long-Term Coverage - Number of clients, broken down by country of the insured. Enter the number of clients the entity provides products related to Other Long-Term Coverages, broken down by the country of the insured.

2.1.44 208 Other Long-Term Coverage - Value of Business Enter the Value of Premiums / Commissions / Fees from products related to Other Long-Term Coverage, which the entity provides to clients, as at the end of the reporting period.

2.2.1 209 Does the entity facilitate payments of Clients in the form of Physical Cash? Please answer Yes or No .

2.2.2 210 Physical Cash - Number of Clients. Enter the number of clients which made payments in the form of Physical Cash during the reporting period.

2.2.3 211 Physical Cash - Number of Transactions. Enter the number of Physical Cash transactions conducted by clients during the reporting period.

2.2.4 212 Physical Cash - Value of Funds Transferred. Enter the value of the Physical Cash transactions conducted by clients during the reporting period. Payments include those between the entity and the client and those conducted on behalf of the entity.

2.2.5 213 Does the entity facilitate payments of Clients in the form of Virtual Currency? Please answer Yes or No .

2.2.6 214 Virtual Currencies - Number of Clients. Enter the number of clients which had payments in the form of Virtual Currency during the reporting period.

Version: 1.3 AML Survey Completion Guide Insurance Page 45 of 64

2.2.7 215 Virtual Currencies - Number of Transactions. Enter the number of Virtual Currency transactions conducted by clients during the reporting period. 2.2.8 216 Virtual Currencies - Value of Funds Transferred. Enter the value of the Virtual Currency transactions conducted by clients during the reporting period. 2.2.9 217 Does the entity facilitate payments of Clients via Third Parties? Please answer Yes or No . 2.2.10 218 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. 2.2.11 219 Third Parties - Number of Transactions. Enter the number of Third-Party transactions conducted by clients during the reporting period. 2.2.12 220 Third Parties - Value of Funds Transferred. Enter the value of the Third-Party transactions conducted by clients during the reporting period. 2.2.13 221 Does the entity facilitate payments of Clients via Credit Card? Please answer Yes or No . 2.2.14 222 Credit Card Payments - Number of Clients Enter the number of clients which made payments via Credit Card during the reporting period. 2.2.15 223 Credit Card Payments - Number of Transactions. Enter the number of Credit Card transactions conducted by clients during the reporting period. 2.2.16 224 Credit Card Payments - Value of Funds Transferred. Enter the value of Credit Card transactions conducted by clients during the reporting period. 2.2.17 225 Does the entity facilitate payments of Clients in the form of Wire Transfers? Please answer Yes or No . 2.2.18 226 Wire Transfers - Number of Clients. Enter the number of clients which made payments in the form of Wire Transfers during the reporting period. Version: 1.3 AML Survey Completion Guide Insurance Page 46 of 64 2.2.19 227 Wire Transfers - Number of Transactions. Enter the number of Wire Transfer transactions conducted by clients during the reporting period. 2.2.20 228 Wire Transfers - Value of Funds Transferred. Enter the value of funds wire transferred by clients during the reporting period. 2.2.21 229 Does your entity facilitate payments of Clients in the form of Transfer of securities? Please answer Yes or No . 2.2.22 230 Transfer of securities - Number of Clients. Enter the number of clients which facilitated payments via transfer of securities, during the reporting period. 2.2.23 231 Transfer of securities- Number of Transactions. Enter the number of transactions conducted by clients during the reporting period, relating to transfer of securities. 2.2.24 232 Transfer of securities- Value of Transactions. Enter the value of transactions relating to payments via Transfer of securities, conducted by clients during the reporting period. 2.2.25 233 Does your entity facilitate payments of Clients in Other Forms of Payment not mentioned above? Please answer Yes or No . 2.2.26 234 Other Forms of Payment - Number of Clients. Enter the number of clients who made payments using other forms of payment not listed above, during the reporting period. 2.2.27 235 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. 2.2.28 236 Other Forms of Payment - Value of Funds Transferred. Enter the value of funds that were transferred by clients using other forms of payments, during the reporting period. 2.2.29 237 Please indicate the types of other forms of payments. List the other forms of payment conducted by clients during the reporting period, which are not listed above. Version: 1.3 AML Survey Completion Guide Insurance Page 47 of 64 2.3.1 238 Total value of funds received, broken down by originating country of payment. Enter the total value of funds received by clients, or on behalf of clients, during the reporting period, broken down by the country where the funds originated. These are funds transferred into the jurisdiction either into the regulated entity or through the jurisdictions banking system, or both. 2.3.2 239 Total

number of transactions received, broken down by origin country of the transaction. Enter the total number of transactions, relating to funds received by clients, or on behalf of clients, during the reporting period, broken down by country of origin of the funds. These are funds transferred into the jurisdiction either into the regulated entity or through the jurisdictions banking system, or both.

2.3.3 240 Total value of funds transferred out (remitted to clients or on behalf of clients), broken down by the country of payment destination. Enter the total value of funds transferred out by clients, broken down by the country of payment destination.

2.3.4 241 Total number of transactions transferred out, broken down by destination country of the transaction. Enter the total number of transactions relating to outward transfers by the clients, or on behalf of clients, broken down by country of destination of the transaction.

2.4.1 242 Do you have any comments or feedback for this tab? Please answer Yes or No.

2.4.2 243 Please use this area to provide any comments or feedback for this tab. Provide comments or feedback. Please include N/A if no comment.

3.1.1 244 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. F2F channels include: Direct-F2F, Referrals within Group F2F, Eligible Introducers F2F, and Other Introducers-F2F.

3.1.2 245 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 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.

3.1.3 246 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.

3.1.4 247 Number of Clients through Referrals within Group - F2F. 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 has F2F interaction with the clients.

3.1.5 248 Number of Clients through Referrals within Group - Non F2F. 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.

3.1.6 249 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 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.

3.1.7 250 Number of Clients through Eligible Introducers. Enter the number of clients which were onboarded through Eligible Introducers, during the reporting period, broken down by the nationality of the BO.

3.1.8 251 Number of Clients through Other Introducers - Non-F2F. Enter the number of clients, that were onboarded through Other Introducers Non - F2F, for the reporting period, broken down by nationality of the BOs.

3.1.9 252 Number of Clients via Online Platforms. Enter the number of clients onboarded using online platforms during the reporting period, broken down by

nationality of the BO. 3.2.1 253 Has the entity outsourced the role of AML Compliance Officer within the reporting period? Please answer Yes or No . 3.2.2 254 To whom has the AML Compliance Officer role been outsourced? If outsourced, select the status that 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. 3.2.3 255 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 as at the end of the reporting period. 3.2.4 256 How many AML Compliance Officers has the entity had within the past 3 years? If no turnover of the Compliance Officer role in the three-year period, answer "1". 3.2.5 257 Has the entity outsourced the role of Money Laundering Reporting Officer within the reporting period? Please answer Yes or No . 3.2.6 258 To whom has the Money Laundering Reporting Officer role been outsourced? If outsourced, select the status that best describes the outsource relationship for the Money Laundering Reporting Officer: Member within Group Version: 1.3 AML Survey Completion Guide Insurance Page 50 of 64 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. 3.2.7 259 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. 3.2.8 260 How many Money Laundering Reporting Officers did the entity have in the past 3 years? If no turnover within the Money Laundering Reporting Officers role in the three-year period, answer "1". 3.2.9 261 Has the entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period? Please answer Yes or No . 3.2.10 262 To whom has the Deputy Money Laundering Reporting Officer role been outsourced? If outsourced, select the status that 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. 3.2.11 263 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. 3.2.12 264 How many Deputy Money Laundering Reporting Officers have you had in the past 3 years? If no turnover of the Deputy Money Laundering Reporting Officers role in the three-year period, answer "1". 3.2.13 265 Has the entity outsourced the function of Targeted Financial Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Insurance Page 51 of 64 Sanction screening within the reporting period? 3.2.14 266 To whom has the Targeted Financial Sanction screening function been outsourced? If outsourced, select the status that 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. 3.2.15 267 What was the outsourcing country of the Targeted Financial Sanction screening function at the end of the reporting period? Enter the country the entity outsourced the Targeted Financial Sanction screening function to, as at the end of the reporting period. 3.2.16 268 How many TFS Screening platforms / software did the entity

have in the past 3 years? If no turnover of the Targeted Financial Sanction screening function in the three-year period, answer "1". 3.2.17 269 Has the entity outsourced the function of transaction or client monitoring within the reporting period? Please answer Yes or No . 3.2.18 270 To whom has the transaction monitoring function been outsourced? If outsourced, select the status that best describes the outsource relationship of the transaction monitoring function: 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. 3.2.19 271 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. Version: 1.3 AML Survey Completion Guide Insurance Page 52 of 64 3.2.20 272 How many Transaction monitoring platforms / software did the entity have in the past 3 years? If no turnover of the Transaction Monitoring platform in the three-year period, answer "1". 3.3.1 273 Physical presence - Place of Business. Enter the country of the entity's physical business operations. 3.3.2 274 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. 3.3.3 275 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. 3.3.4 276 In which country is the parent or holding company incorporated? Enter the country the parent or holding company incorporated. 3.3.5 277 In which countries, by percentage of equity ownership, are shareholders of the entity located. For publicly listed entities please list beneficial ownership of 10% or more. Select the 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. 3.3.6 278 How many Beneficial Owners does the entity have, by country of nationality of the Beneficial Owner, at the end of the reporting period? Enter the number of Beneficial Owners of the entity, holding 10% or more, broken down by country of nationality of the shareholder(s). 3.3.7 279 How many directors does the entity have appointed, by country of nationality of the director, at the end of the reporting period? Enter the number of directors of the entity, broken down by country of nationality of the directors. 3.4.1 280 Does the entity have any comments or feedback for this tab? Please answer Yes or No . 3.4.2 281 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 'NA' if no comment. Version: 1.3 AML Survey Completion Guide Insurance Page 53 of 64 AML Controls Questions: No. Question No. Question Description/Explanation 1.1.1 282 Does the Governing Body receive comprehensive reports, information and statistics regarding ML/TF/PF risks and issues? Please answer Yes or No . 1.1.2 283 Does the Governing Body review all AML/CFT/CPF related policies and procedures periodically? Please answer Yes or No . 1.1.3 284 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. 1.1.4 285 Is there an audit risk and compliance subcommittee? Please answer Yes or No . 1.1.5 286 Is there an approved Charter for the Governing Body and Sub-Committees? Please answer Yes or No . 1.1.6 287 Is the entity subject to group wide governance practices? Please answer Yes or No . 1.1.7 288 Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body? Please answer Yes or No . 1.1.8 289 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 . 1.1.9 290 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 . 1.1.10 291 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 . 1.1.11 292 Provide the country of jurisdiction. Enter the names of the jurisdiction(s) in which the Version: 1.3 AML Survey Completion Guide Insurance Page 54 of 64 entity, or its directors, shareholders, beneficial owners or senior officers were denied an application by any regulatory body. 1.1.12 293 Are any of the entity's AML Officers, Shareholders, Beneficial Owners, Directors, or Senior Management PEPs? Please answer Yes or No . 1.1.13 294 Does the Board ensure that the AMLCO/MLRO receive the appropriate training? Please answer Yes or No . 1.2.1 295 Has an AML Compliance Officer been appointed? Please answer Yes or No . 1.2.2 296 Has an MLRO been appointed? Please answer Yes or No . 1.2.3 297 Is a Deputy MLRO appointed? Please answer Yes or No . 1.2.4 298 Is the AMLCO employed at a managerial level of the company? Please answer Yes or No . 1.2.5 299 For reporting lines, does the AMLCO report to the Governing Body? Please answer Yes or No . 1.2.6 300 Does the AMLCO maintain independence from revenues related / client facing activities? Please answer Yes or No . 1.2.7 301 Does the AMLCO have sufficient compliance/AML skills and experience to perform their function? Please answer Yes or No . 1.2.8 302 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 . 1.2.9 303 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 . 1.2.10 304 Does the AMLCO provide oversight of the AML/CFT/CPF and Sanctions risk assessment framework and procedures? Please answer Yes or No . 1.2.11 305 Does the MLRO maintain independence from revenues related / client facing activities? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Insurance Page 55 of 64 1.2.12 306 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 . 1.3.1 307 Has the entity developed and implemented AML/CFT/CPF and Sanctions training and awareness programme? Please answer Yes or No . 1.3.2 308 Have the directors received AML/CFT/CPF and Sanctions training during the reporting period? Please answer Yes or No . 1.3.3 309 Has the AML Compliance Officer received specialized compliance/AML/CFT/PF training over the last year relevant to the current position? Please answer Yes or No . 1.3.4 310 Has the MLRO received specialized compliance/AML/CFT/PF training over the last year relevant to the current position? Please answer Yes or No . 1.3.5 311 Has the DMLRO received specialized compliance/AML/CFT/PF training over the last year relevant to the current position? Please answer Yes or No . 1.3.6 312 Does the AMLCO ensure that ongoing training programs are kept up to date and relevant? Please answer Yes or No . 1.3.7 313 Are changes to policy and procedures communicated to all staff/directors and senior management? Please answer Yes or No . 1.3.8 314 Does the entity assess AML/CFT/CPF and Sanctions knowledge of its employees? Please answer Yes or No . 1.3.9 315 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. 1.3.10 316 Does the AMLCO organize or ensure

AML/CFT/CPF and Sanctions training is conducted for all staff annually? Please answer Yes or No . 1.4.1 317 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 Insurance Page 56 of 64 1.4.2 318 Is there a developed Internal Audit plan, with focus on AML/CFT/CPF and Sanctions, reviewed by the Board? Please answer Yes or No . 1.4.3 319 Is the Internal Audit plan approved by the Board? Please answer Yes or No . 1.4.4 320 Does the internal AML audit include reviews of the AML/CFT/CPF related policies, procedures and processes? Please answer Yes or No . 1.4.5 321 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 . 1.4.6 322 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. 1.4.7 323 Does the Board review the AML audit program? Please answer Yes or No . 1.4.8 324 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. 1.4.9 325 Where applicable, does the internal audit include testing on functions which are outsourced? Please select Yes , No , or Not Applicable . 1.4.10 326 Where applicable, does the internal audit include testing of EI relationships? Please enter Yes, No, or Not Applicable. 1.4.11 327 Does the Internal Audit include testing for the AML/CFT/CPF and Sanctions training function? Please answer Yes or No . 1.4.12 328 Does the Internal Audit include testing for the entity's TFS and PF controls? Please answer Yes or No . 1.5.1 329 Does the entity conduct a business risk assessment which considers ML/TF/PF and Sanctions risk factors? Please answer Yes or No . 1.5.2 330 Does the entity employ a Risk Based Methodology when assessing and allocating oversight of its clients? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Insurance Page 57 of 64 1.5.3 331 Does the entity consider the ML/TF/PF risks of the clients, (including BOs, in their risk assessment? Please answer Yes or No . 1.5.4 332 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 . 1.5.5 333 Does the entity consider the ML/TF/PF products and services (existing and new) in their risk assessment? Please answer Yes or No . 1.5.6 334 Does the entity consider the ML/TF/PF delivery channels (existing and new) in their risk assessment? Please answer Yes or No . 1.5.7 335 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 . 1.5.8 336 Does the entity consider the ML/TF/PF technology (existing and new) in their risk assessment? Please answer Yes or No . 1.5.9 337 Does the entity consider Sanctions risk factors in their risk assessment? Please answer Yes or No . 1.5.10 338 Does the entity consider PF risk factors in their risk assessment? Please answer Yes or No . 1.5.11 339 Does the entity consider outsourcing risk factors in its risk assessment? Please answer Yes or No . 1.5.12 340 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 . 1.5.13 341 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. 1.5.14 342 How often, in months, do you review medium-Risk relationships/accounts? Please respond using the following: Version: 1.3 AML Survey Completion Guide Insurance Page 58 of 64

Never, More than 18 months, 7 12 months, 1 6 months. 1.5.15 343 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. 1.6.1 344 Does the entity rely on Group AML/CFT policies and procedures? Please answer Yes or No . 1.6.2 345 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 . 1.6.3 346 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 . 1.6.4 347 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 . 1.6.5 348 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 . 1.6.6 349 Does the entity have Board, or governing body, approved policies and procedures for establishing Source of Funds? Please answer Yes or No . 1.6.7 350 Does the entity have Board, or governing body, approved policies and procedures for employee screening? Please answer Yes or No . 1.6.8 351 Does the entity have Board or governing body approve policies and procedures for training of staff? Please answer Yes or No . 1.6.9 352 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 . Version: 1.3 AML Survey Completion Guide Insurance Page 59 of 64 1.6.10 353 Does the entity have policies and procedures on collecting due diligence on counterparties and business associates? Please answer Yes or No . 1.6.11 354 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 . 1.6.12 355 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. 1.7.1 356 Does the entity have a screening process? Please answer Yes or No . 1.7.2 357 Is the screening process manual, automated or a combination? Select which best applies: Manual, Automated, or Automated with Manual Checks. 1.7.3 358 Is the screening process fully or partially outsourced? Please select Fully or Partially . 1.7.4 359 When designated lists are updated, does the screening process reflect these updates within 24 hours? Please answer Yes or No . 1.7.5 360 Is sanctions monitoring done in real time or after the event? Select what applies: No process , After the event , or Real time . 1.7.6 361 Is the customer and counterparty database screened against the designated H.M. Treasury list? Please answer Yes or No . 1.7.7 362 Are procedures in place to ensure customers / counterparties are screened prior to payouts (remittance of funds)? Please answer Yes or No . 1.7.8 363 Does the entity have Asset Freeze procedures? Please answer Yes or No . 1.7.9 364 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 . Version: 1.3 AML Survey Completion Guide Insurance Page 60 of 64 1.7.10 365 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 . 1.7.11 366 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 . 1.7.12 367 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 . 1.7.13 368 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 . 1.8.1 369 Does the entity have transaction monitoring policies and procedures developed commensurate to its operations? Please answer Yes or No . 1.8.2 370 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 . 1.8.3 371 Does the entity have in place an automated system for monitoring transactions for potential suspicion and reporting suspicious transactions? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Insurance Page 61 of 64 1.8.4 372 Is there a requirement for senior management approval before establishing high risk business relationships i.e. with PEPs? Please answer Yes or No . 1.8.5 373 Does the entity have EDD procedures? Please answer Yes or No . 1.8.6 374 Does the entity apply EDD on customers and counterparties based in higher-risk countries? Please answer Yes or No . 1.8.7 375 Where high risk clients are identified, did the entity conduct EDD measures for every transaction such customers carry out? Please answer Yes or No . 1.8.8 376 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. 1.9.1 377 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 . 1.9.2 378 Does the entity s policies and procedures identify the MLRO and how to make a filing to them? Please answer Yes or No . 1.9.3 379 Does the entity have policies and procedures for reporting to the FRA? Please answer Yes or No . 1.9.4 380 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. 1.9.5 381 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. 1.9.6 382 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. 1.9.7 383 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 . Version: 1.3 AML Survey Completion Guide Insurance Page 62 of 64 1.9.8 384 Has the entity been penalized or received a warning for non-compliance, from the FRA? Please answer Yes or No . 1.9.9 385 Does the entity maintain a log identifying all internal SARs filed to the MLRO along with their status? Please answer Yes or No . 1.9.10 386 Does the entity maintain a log identifying all SARs filed to the FRA along with their status? Please answer Yes or No . 1.9.11 387 If the MLRO decides not to file a SAR to the FRA is the

reason for not filing documented? Please answer Yes or No . 1.10.1 388 Does the entity maintain Record Keeping Procedures? Please answer Yes or No . 1.10.2 389 How many years after the end of the business relationship are records retained? Enter the number of years 1.10.3 390 Are any records retained and accessible in the Cayman Islands? Please answer Yes or No . 1.10.4 391 How accessible and swiftly available are records for competent authorities - in hours? Enter the average time to comply in hours. 1.10.5 392 Does the entity maintain a declined business log? Please answer Yes or No . 1.10.6 393 Does the entity maintain records of its training programme? Please answer Yes or No . 1.11.1 394 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. 1.11.2 395 Was a risk assessment conducted on all outsourcing arrangements prior to initiation of the arrangement? Select which best applies: Yes , No or Not Applicable . 1.11.3 396 Are 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. Version: 1.3 AML Survey Completion Guide Insurance Page 63 of 64 1.11.4 397 In total, how many services does the entity outsource to 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. 1.11.5 398 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. 1.11.6 399 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. 1.11.7 400 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. 1.11.8 401 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. 1.11.9 402 If relevant, does the outsourced AMLCO/MLRO have access to the entity s board? Select which best applies: Yes , No or Not Applicable . This question is only applicable if the entity outsources any activities. 1.11.10 403 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. 1.11.11 404 Is sub-contracting of any of the outsourced activities permitted? Select which best applies: Yes , No or Not Applicable . Version: 1.3 AML Survey Completion Guide Insurance Page 64 of 64 This question is only applicable if the entity outsources any activities. 1.11.12 405 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. 1.12.1 406 Do you have any comments or feedback for this tab? Please answer Yes or No . 1.12.2 407 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.