



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.

Version: 1.3 AML Survey Completion Guide Banking Page 2 of 66 Revision History:

Effective Date	Version Number	Revision Description
26 September 2022	1.0	Initial release of document
3 October 2022	1.1	Update to definitions
1 May 2023	1.2	Amendments to questions, along with updates to definitions, descriptions, and explanations
1 May 2024	1.3	Updates to definitions, descriptions, and explanations.

Version: 1.3 AML Survey Completion Guide Banking Page 3 of 66 Contents

Information	4	2 Form
Accessing and Submitting the AML Survey	4	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	12	

Version: 1.3 AML Survey Completion Guide Banking Page 4 of 66

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 17(3)(a) of the Banks and Trust Companies Act (2021 Revision). This Guide gives support to FSPs which carry out banking business for accessing, completion and submission of the AML Survey Banking Form.

2 FORM INFORMATION The AML Survey Banking Form is to be completed by each FSP holding a Banking licence - commonly referred to as Entity for purposes of this form. The AML Survey Banking Form is made up of two (2) sections for collecting AML risk data: 1) the AML Inherent Risks; and 2) AML Controls.

3 ACCESSING AND SUBMITTING THE AML SURVEY

3.1 ACCESS TO THE AML SURVEY Entities will receive an invitation to the web-based survey by using the current contact details of the Entity which the Authority has on record. Each member of the Entity who receives an invitation can activate their own account. The invitation is specific to the recipient s address and cannot be shared or forwarded. Clicking on the link provided in the invitation will take the user to the account creation webpage. On successful account activation, the user will receive a confirmation . Logging into the STRIX portal is then accomplished by clicking on the Return Home button available immediately after 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, Anti- Money Laundering Compliance Officer (AMLCO), Money Laundering Reporting Officer (MLRO) and any other additional contacts, upon request from the Entity. If an Entity is unsure of what their contact details are, they can contact the Authority at .

Version: 1.3 AML Survey

Completion Guide Banking Page 5 of 66 To access the AML Survey: 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 Banking Page 6 of 66 3. The recipient will be asked to re-enter their password. 4. Once the recipient s password has been re-entered, and matches, they can submit and finish the activation process. An Notification of Successful Activation will be sent providing a Go to Portal link which can be used for all future access.

Version: 1.3 AML Survey Completion Guide Banking Page 7 of 66

5. The user should then click on the Return To Home button. Version: 1.3 AML Survey Completion Guide Banking Page 8 of 66 6. The recipient should then enter their username, which is their address where they received the AML Survey invite, and the password they just created. 7. A six digit two-factor authentication code will be sent to the survey recipient s

Version: 1.3 AML Survey Completion Guide Banking Page 9 of

66 8. The recipient should enter the six (6) digit two-factor authentication code on the webpage where prompted. 9. Click Open to access the AML Survey request. If a survey recipient is a contact for two (2) or more FSPs, or where an Entity has two or more licences or registrations, related surveys will be listed here for the recipient to view and access.

Version: 1.3 AML Survey Completion Guide Banking Page 10 of 66

3.2 COMPLETING THE AML SURVEY FORM 1. Click the Current Questionnaire to access the AML Survey Form and start populating the form with the required data. a. Completion guidance for the AML Survey is available at section 5 of this Guide below. b. The recipient(s) can open, update, and close the AML Survey as many times as needed prior to the survey due date so long as the recipient selects Save . c. Once the AML Survey has been completed it can either be Saved and Exported for internal review or Saved and Submitted to the Authority. Users should note that the survey does not have Excel import functionality. d. Upon submission, you will receive a confirmation from Cayman Islands Monetary Authority stating, Notification of Successful Submission . The Entity s name and the survey name will be listed for verification, useful for instances where users are submitting for more than one entity. e. Once the AML Survey is Submitted an Excel and PDF copy of the completed survey will be available under Current Questionnaire . f. Upon submission to the Authority a review of the AML Survey will be conducted by a member of the AMLD. If information is missing or needs clarification the Authority will Reject the AML Survey through an notification detailing the specifics. The recipient will then be required to make the necessary corrections or provide the additional detail to the Authority as indicated in the . g. Partial or incomplete submissions will only be permitted by the Authority under approved circumstances. 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. Licence 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 are several questions in the survey that require country breakdown details, the ability to bulk paste into STRIX will ease the burden of inputting individual responses. To upload bulk entries for those country breakdown questions, please do the following:

- 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.
- 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.
- Select Add to upload the desired data into the survey form, or Clear to remove the data.

Note: Individual items may also be removed from the list by clicking on the delete button, next to the respective country, on the list.

4 OTHER USEFUL INFORMATION

4.1 USER ACCOUNT LOCKOUTS

In the event the AML Survey recipient has exceeded the number of permitted failed login attempts, their account will be temporarily locked. An email will be sent to the user identifying that they won't be able to log in. There are three (3) stages of lock out: 1) locked out for five (5) minutes; 2) locked out for ten (10) minutes; and, 3) if the user persists, locked out permanently. To avoid being locked out, if the user fails to remember their password, they should update their password on the login page. If the user is permanently locked out, they should contact support to request having their account re-activated.

4.2 INTERNET BROWSER

Users should be aware that the AML Survey will not open using the legacy Windows Explorer browser or with dated Windows operating systems for security purposes. If the user's browser is defaulted to Explorer the link should be copied and opened in Chrome, Edge, Safari, or other modern browser.

4.3 DATA AND SECURITY

The AML Survey, the auto-generated communication from STRIX, and the data collected from FSPs in the AML Survey are all maintained on-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 Banking Page 12 of 66

5 AML SURVEY GUIDANCE

Below are descriptions and explanations to the risk factors and controls factors you are required to provide information 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.
Beneficial Owner (BO)	Beneficial Owner, as defined in the AMLRs, 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. Generally, a Bank's Clients/ Customers are made up of Natural Persons, Legal Persons, and Legal Arrangements. Controller A person appointed to assume control of the affairs of a legal person or legal arrangement. Correspondent Banking The provision of banking services by one institution (the Correspondent) to another institution (the Respondent) for the purposes of executing third-party payments, trade transactions in a specific currency. For example, a correspondent bank acts as an intermediary or agent, facilitating wire transfers, conducting business transactions on behalf of the Respondent and its customers. Version: 1.3 AML Survey Completion Guide Banking Page 13 of 66 Correspondent banking does not include one-off transactions. 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\$). 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. Direct Face-to-Face (Direct-F2F) The engagement of a client directly, with the natural person physically present. The engagement will not be via , , online, etc. Eligible Introducers A person that introduces applicants for business to a FSP whereby the FSP may place reliance on the introducer to verify the identity of the applicant for business, or beneficial owners, in accordance with Part IV of the AMLRs. The Eligible Introducer must satisfy the conditions set out in Regulation 25 of the ALMRs i.e., a person who falls within one of the categories under Regulation 22(d) and who provides a written assurance pursuant to Regulation 24(2)(b) that they verified the identity of an applicant for business, or beneficial owner, in accordance with Part IV of the AMLRs. Fintech Service Means a service that uses innovative technology to improve, change or enhance financial services but is not a virtual asset service. Foundation This definition refers to Cayman Islands foundation companies that are governed by the Companies Act (2023 Revision), except to the extent that it is modified by the Foundation Companies Act, 2017 or those foundation companies established in other jurisdictions. FRA Financial Reporting Authority. Gov / Pub Sector Business conducted in or with Government or Public Version: 1.3 AML Survey Completion Guide Banking Page 14 of 66 Sector. High Value Dealers Any business or sole trader that accepts or makes high value cash payments of US\$15,000 or more (or equivalent in any currency) in exchange for goods. HNWI A high net worth individual (HNWI) is: (i) an individual whose net worth is at least CI\$800,000 (approx. US\$1,000,000) or its equivalent in any other currency; or (ii) any person that has total assets of not less than CI\$4,000,000 (approx. US\$5,000,000) or its equivalent in any other currency. HNWIs are NOT Ultra HNWI and should not be double counted. Import and Export Business A company that facilitates trades of goods and commodities between domestic and foreign companies. In other words, it's a company that buys goods internationally and ships them in for domestic purchases and/or exports goods and services produced in the home country for sale to other markets.

Individual A client who is a Natural person and not a Legal Person or Legal Arrangement.

Legal Person A company or other entity, such as a foundation, 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.

ML/TF/PF Money Laundering/Terrorism Financing/Proliferation Financing Money Service Business (MSB) Money services business means the business of providing, in or from within the Islands, any of the following services: (a) money transmission; (b) cheque cashing; (c) currency exchange; (d) the issuance, sale or redemption of money orders or traveller's cheques.

Natural Person A human being, as distinguished from a company or other entity created by operation of law with separate legal personality.

Nominee Director A natural or legal person who takes on the role of company director on 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 (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/offices of the FSP.

NPO A Non-profit Organisation is a legal person or legal 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 the corporate group, 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.

Payable Through Accounts Correspondent accounts that are used directly by third parties to transact business on their own behalf. For example, if a customer of a Respondent bank has direct access to the said Respondent bank's Correspondent account (to process their own transactions) then the Correspondent account is being used as a Payable Through Account.

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, an 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, an important political party official; and (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 1 January 2023 to 31 December 2023.

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

Assets . Special Economic Zone Business Means any type of business authorised to be carried on in a special economic zone pursuant to any Law in force in the Islands. Targeted Financial Sanctions (TSF) Means both asset freezing and restrictions and directions to prevent funds or other assets from being made available, directly, or indirectly, to or for the benefit of persons and entities designated by the Office of Financial Sanctions Implementation, HM Treasury (OFSI). Transactions Events where services were engaged with or on behalf of a client. For example, the movement of funds (in or out of the institution) processed by the customers themselves or on behalf of the customers. Version: 1.3 AML Survey Completion Guide Banking Page 17 of 66 Trust A trust is a legal arrangement which distinguishes between the legal and beneficial ownership of property. Legal ownership is transferred to a trustee who manages and administers the property for the benefit of the beneficiaries or for the furtherance of certain purposes. Ultra HNWI Ultra-High Net Worth Individuals, also referred to as UHNWI, are all HNWIs whose net worth is greater than or equal to US\$30,000,000. Value of Client Assets The total value of funds held for or on behalf of customers. Client assets include monies belonging to customers held in savings, chequing, fixed/time deposit accounts, and investment portfolios or custody services. Virtual Assets Service Provider (VASP) Includes those services identified within the Virtual Asset (Service Providers) Act (2022 Revision), and as amended, as well as products which include any digital representation of value that can be digitally traded, transferred or used for payment. Timeframe Value of Client Assets Total value of client assets as at the end of the reporting period. Timeframe Number of Clients Number of clients as at the end of the reporting period. Timeframe Value of Transactions Value of transactions conducted for the client during the reporting period. Timeframe Number of Transactions Number of Transactions conducted for clients during the reporting period.

AML Inherent Risk Questions:

Ref. No.	Question No.	Question Description/Explanation
1.1.1	1	Total Clients / Customers at the end of the reporting period. Enter the total number of clients the entity has at the end of the reporting period. This number should include all clients the entity provides financial products and services to as opposed to accounts e.g., If the same client, individual or legal entity, has two accounts in the same name, then only 1 client should be counted. Do not double count. Where applicable, the number of clients /customers should only include those of the Cayman Islands legal entity. Total clients consist of natural persons and legal persons and legal 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. Where applicable, the total transactions should only include those of the Cayman Islands legal entity.
1.1.3	3	Total Value of Client Assets. Enter the total value of client assets, including those on deposit, for clients reported in Question 1 as at the end of the reporting period. Where applicable, the total transactions should only include those of the Cayman Islands legal entity.
1.1.4	4	Clients/customers that are Natural Persons, broken down by nationality of the client. Enter the number of clients that are natural persons, subdivided by nationality, as at the end of the reporting period. This category is specific to clients who are natural persons who have a direct business relationship with the entity.
1.1.5	5	Clients/customers that are Natural Persons, broken down by residency of the client. Enter the number of clients that are natural persons, subdivided by their residency. This category is specific to clients who are natural persons who have a direct business relationship with the entity.
1.1.6	6	Total Transactions for the reporting period for clients Enter the total number of transactions conducted for clients who are natural Version: 1.3 AML Survey

Completion Guide Banking Page 19 of 66 who are Natural Persons. 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 did not conduct such transactions, a 0 value should be used. 1.1.7 7 Value of Client Assets for clients who are Natural Persons. Enter the total value of client assets, including deposits, for clients that are natural persons as at the end of the reporting period. This category is specific to clients who are natural persons who have a direct business relationship with the entity. 1.1.8 8 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 legal arrangements subdivided by country of incorporation as at the end of the reporting period. Examples of legal persons and legal arrangements include, but are not limited to, corporate entities, foundations and trusts. 1.1.9 9 Number of Transactions - Legal Persons and Arrangements. Enter the total number of transactions that were conducted by customers who are legal persons and legal arrangements during the reporting period. Examples of legal persons and legal arrangements include, but are not limited to, Corporate entities, Foundations and Trusts. 1.1.10 10 Value of Client Assets for all Legal Persons and Arrangements. Enter the total value of client assets, including deposit, for clients who are legal persons or legal arrangements, as at the end of the reporting period. Examples of legal persons and legal arrangements include, but are not limited to, Corporate entities, Foundations and Trusts. 1.1.11 11 Number of clients/customers Enter the total number of Version: 1.3 AML Survey Completion Guide Banking Page 20 of 66 rated as High Risk at the end of the reporting period. clients/customers that were rated high risk at the end of the reporting period. 1.1.12 12 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. 1.2.1 13 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 legal arrangements, broken down by nationality of the BO, as at the end of the review period. This category is specific to legal persons and legal arrangements. Examples include, but are not limited to, the total number of UBOs of Corporate entities and Settlers of Trusts. A BO should not be counted more than once regardless of the number of business relationships they have with the entity. If the entity does not have any clients that fit this category, record a 0. 1.2.2 14 Does the entity have any clients that have BOs who are directors of the client? Answer Yes or No 1.2.3 15 Number of clients that have BOs who are directors of the client. Enter the total number of clients that have BOs who are also directors of the client as at the end of the reporting period. 1.2.4 16 Does the entity have any clients that have BOs who are controllers of the client? Answer Yes or No 1.2.5 17 Number of clients that have BOs who are controllers of the client. Enter the total number of clients whose BOs are also controllers of the client as at the end of the reporting period. 1.2.6 18 Does the entity have any clients that have BOs who are also senior managing officials of the client? Please answer Yes or No. 1.2.7 19 Number of clients that have BOs who are also senior managing officials of the client. Enter the total number of clients whose BOs are also senior managing officials of the client. Version: 1.3 AML Survey Completion Guide Banking Page 21 of 66 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. 1.2.8 20 Does the entity have any clients that have BOs who are

HNWIs? Please answer Yes or No . This category is specific to clients who are Legal Persons and Legal Arrangements. Examples include, but not limited to, instances where a BO of a Company or Settlor of a Trust is a HNWI. 1.2.9 21 Number of Clients that have BOs who are HNWIs. Enter the total number of clients that have BOs who are also HNWIs. HNWIs is specific to those persons whose net worth is at least CI\$800,000 (approx. US\$1,000,000) and/or those that have assets valued at least CI\$4,000,000 (approx. US\$5,000,000) Do Not include clients/customers with net worth equal to or greater than US\$30,000,000. If the entity does not have any clients that fit this category record a 0 .

1.2.10 22 Does the entity have any clients that have BOs who are Ultra HNWIs? Please answer Yes or No . 1.2.11 23 Number of Clients that have BOs who are Ultra HNWIs. Enter the total number of clients who have BOs who are also Ultra HNWIs. UHNWIs is specific to those persons whose net worth is equal to or greater than US\$30,000,000. If the entity does not have any clients that fit this category record a 0 . 1.2.12 24 Does the entity have any clients that have BOs who are PEPs? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Banking Page 22 of 66 1.2.13 25 Number of BOs of clients who are PEPs, broken down by nationality of the PEP. Enter the total number of clients who have BOs who are PEPs as at the end of the reporting period. 1.2.14 26 Does the entity have any clients that have Nominees acting on behalf of a Beneficial Owner (inc. Nominees within the ownership structure)? Please answer Yes or No . 1.2.15 27 Number of clients that have Nominees acting on behalf of a BO, or a Nominee within the ownership structure, broken down by nationality of the BO. Enter the total number of clients which have Nominees acting on behalf of BOs, or within its ownership structure, categorised by nationality of the BO. This category is specific to clients who are legal persons and legal arrangements. 1.3.1 28 Number of clients that have a nominee appointed on behalf of a director, broken down by country of nationality of the nominee director. Enter the total number of clients which have a nominee director as at the end of the review period, broken down by country of nationality of the nominee director. 1.3.2 29 Number of clients that 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 a nominee director as at the end of the review period, broken down by country of nationality of the director (not the nominee). 1.3.3 30 Number of directors and/or senior management of clients who are PEPs, broken down by nationality of the director / senior management. Enter the total number of clients who have directors and/or senior management who are also PEPs as at the end of the reporting period. 1.3.4 31 Number of directors and/or senior management of clients who are High Net Worth Individuals. Enter the number of directors and/or senior management of the clients who are also HNWIs as at the end of the reporting period. Do not count or include senior management who are Ultra HNWIs. 1.3.5 32 Number of directors and/or senior management of clients who are Ultra High Net Worth Enter the number of directors and/or senior management of the clients who are also Ultra HNWIs as at the end of the reporting period. Version: 1.3 AML Survey Completion Guide Banking Page 23 of 66 1.3.6 33 Number of directors and/or senior management of clients who are PEPs & High Net Worth Individuals, broken down by nationality of the director / senior management. Enter the number of directors and/or senior management of the clients who are both PEPs and HNWIs as at the end of the reporting period. 1.4.1 34 Does the entity have any clients that are Gov / Pub Sector? Please answer Yes or No . 1.4.2 35 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 36 Gov / Pub Sector - Number of Transactions. Enter the number of transactions processed on behalf of clients that are a Government or Public Sector during the reporting period, broken down by government jurisdiction.

1.4.4 37 Gov / Pub Sector - Value of Transactions. Enter the value of transactions processed on behalf of clients that are Government or Public sector, during the reporting period.

1.4.5 38 Gov / Pub Sector - Value of Client Assets. Enter the value of client assets, including on deposit, of the clients that are Government or Public sector, at the end of the reporting period.

1.4.6 39 Does the entity have any clients that are NPOs? Please answer Yes or No .

1.4.7 40 NPO - Number of Clients, broken down by country of incorporation of the client. Enter the number of NPO clients the entity has, as at the end of the reporting period.

1.4.8 41 NPO - Number of Transactions. Enter the number of transactions processed on behalf of clients that are NPOs, during the reporting period.

1.4.9 42 NPO Value of Transactions. Enter the value of transactions processed for clients that are NPOs, during the reporting period.

Version: 1.3 AML Survey Completion Guide Banking Page 24 of 66

1.4.10 43 NPOs - Value of Client Assets. Enter the value of client assets, including on deposit, of clients that are NPOs, as at the end of the reporting period.

1.4.11 44 Does the entity have any clients that are Foundations? Please answer Yes or No .

1.4.12 45 Foundations Number of Clients, broken down by country of establishment of the client. Enter the number of clients the entity has, as at the end of the reporting period, that are a Foundation.

1.4.13 46 Foundations Number of Transactions. Enter the number of transactions processed on behalf of clients that are a Foundation, during the reporting period.

1.4.14 47 Foundations Value of Transactions. Enter the value of transactions processed for clients that are Foundations, during the reporting period.

1.4.15 48 Foundations Value of Client Assets. Enter the value of client assets, including on deposit, of clients that are a Foundation, as at the end of the reporting period.

1.4.16 49 Does the entity have any clients that are trusts? Please answer Yes or No .

1.4.17 50 Trusts - Number of Clients, broken down by country of incorporation of the client. Enter the number of clients the entity has that are Trusts, as at the end of the reporting period.

1.4.18 51 Trusts - Number of Transactions. Enter the number of transactions processed on behalf of clients that are Trusts, during the reporting period.

1.4.19 52 Trusts Value of Transactions. Enter the value of transactions processed for clients that are Trusts, during the reporting period.

1.4.20 53 Trusts - Value of Client Assets. Enter the value of client assets, including on deposit, of clients that are Trusts, at the end of the reporting period.

1.4.21 54 Does the entity have any clients that are Segregated Portfolio Companies? Please answer Yes or No .

1.4.22 55 Segregated Portfolio Companies - Number of Clients, broken down by country of incorporation of the client. Enter the number of clients the entity has that are Segregated Portfolio Companies as at end of the reporting period.

Version: 1.3 AML Survey Completion Guide Banking Page 25 of 66

1.4.23 56 Segregated Portfolio Companies - Number of Transactions. Enter the number of transactions processed on behalf of clients that are Segregated Portfolio Companies, during the reporting period.

1.4.24 57 Segregated Portfolio Companies Value of Transactions. Enter the value of transactions processed on behalf of clients that are Segregated Portfolio Companies, during the reporting period.

1.4.25 58 Segregated Portfolio Companies - Value of Client Assets. Enter the value of client assets, including on deposit, of clients that are a Segregated Portfolio Company, as at the end of the reporting period.

1.4.26 59 Does the entity have any clients that are registered in a Special Economic Zone? Please answer Yes or No . Note that one client can fall under multiple categories of

structure. 1.4.27 60 Special Economic Zone - Number of Clients, broken down by country of incorporation of the client. Enter the number of clients the entity has that are Special Economic Zone companies as at end of the reporting period. 1.4.28 61 Special Economic Zone - Number of Transactions. Enter the number of transactions conducted by clients that are Special Economic Zone companies, during the reporting period. 1.4.29 62 Special Economic Zone Value of Transactions. Enter the value of transactions processed for clients that are Special Economic Zone Companies, during the reporting period. 1.4.30 63 Special Economic Zone - Value of Client Assets. Enter the value of client assets, including on deposit, of clients that are from a Special Economic Zone, as at the end of the reporting period. 1.4.31 64 Does the entity have any clients that are Funds / Collective Investment Vehicles? Note that one client can fall under multiple categories of structure. Please answer Yes or No. 1.4.32 65 Funds / Collective Investment Vehicles - Number of Clients, broken down by country of incorporation of the client. Enter the number of clients the entity has that are Funds / Collective Investment Vehicles as at the end of the reporting period. Version: 1.3 AML Survey Completion Guide Banking Page 26 of 66 1.4.33 66 Funds / Collective Investment Vehicles - Number of Transactions. Enter the number of transactions processed on behalf of clients that are Funds / Collective Investment Vehicles, during the reporting period. 1.4.34 67 Funds/Collective Investment Vehicles Value of Transactions. Enter the value of transactions processed on behalf of clients who are Funds/Collective Investment Vehicles, as at the end of the reporting period. 1.4.35 68 Funds / Collective Investment Vehicles - Value of Client Assets. Enter the value of client assets, including on deposit, of clients that are Funds / Collective Investment Vehicles, as at the end of the reporting period. 1.5.1 69 Natural Person Clients - Does the entity have any clients that are PEPs? Please answer Yes or No. 1.5.2 70 Number of Natural Persons clients who are PEPs, broken down by nationality of the PEP. Enter the number of clients the entity has, as at the end of the reporting period, that are natural persons, and are PEPs, broken down by the nationality of the PEP. 1.5.3 71 Natural Persons Clients - PEPs - Number of Transactions. Enter the number of transactions conducted by clients that are natural persons, and are PEPs, during the reporting period. 1.5.4 72 Natural Persons Clients- PEPs - Value of Client Assets. Enter the value of client assets, including on deposit, of the clients that are natural persons, and are PEPs, as at the end of the reporting period. 1.5.5 73 Does the entity have any Natural Person clients that are HNWIs? Please answer Yes or No. This category does NOT include those individuals who are Ultra HNWI. 1.5.6 74 Number of Natural Persons Clients who are HNWIs. Enter the number of clients the entity has, that are natural persons, and are HNWIs as at the end of the reporting period. 1.5.7 75 Natural Persons Clients - HNWIs - Number of Transactions. Enter the number of transactions conducted by clients that are natural Persons, and are HNWIs, during the reporting period. 1.5.8 76 Natural Persons Clients - HNWIs - Value of Client Assets. Enter the value of client assets, including on deposit, of clients that are natural persons, and are HNWIs, as at the end of the reporting period. Version: 1.3 AML Survey Completion Guide Banking Page 27 of 66 1.5.9 77 Does the entity have any Natural Person clients who are Ultra HNWIs? Please answer Yes or No. 1.5.10 78 Number of Natural Persons clients who are Ultra HNWIs. Enter the number of clients the entity has, that are natural persons, and are also Ultra HNWIs as at the reporting period. 1.5.11 79 Natural Persons Clients Ultra HNWIs - Number of Transactions. Enter the number of transactions conducted by clients that are natural persons, and are Ultra HNWIs, during the reporting period. 1.5.12 80 Natural Persons Clients Ultra HNWIs - Value of Client Assets. Enter the value of client assets,

including on deposit, of clients that are natural persons, and are Ultra HNWIs, as at the end of the reporting period. 1.5.13 81 Does the entity have any Natural Person clients that are PEPs and HNWIs / Ultra HNWI? Please answer Yes or No . 1.5.14 82 Number of Natural Persons 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, as at the end of the reporting period. 1.5.15 83 Natural Persons - PEPs & HNWIs / Ultra HNWI - Number of Transactions. Enter the number of transactions conducted on behalf of clients that are natural persons, who are both PEPs and HNWIs / Ultra HNWIs, during the reporting period. 1.5.16 84 Natural Persons - PEPs & HNWIs / Ultra HNWIs - Value of Client. Enter the value of client assets of clients that are natural persons, and are both PEPs and HNWIs / Ultra HNWIs, as at the end of the reporting period. 1.6.1 85 Nature of Business / Source of Funding: Enter the total number of clients that are legal persons of, or natural persons employed in, the following sectors, broken down by nationality or country of incorporation of the clients: Banking Institutions Other Financial regulated Enter 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. Version: 1.3 AML Survey Completion Guide Banking Page 28 of 66 Business* Financial Leasing Money Lending Accountants Fintech *excluding MSBs, VASP Products and Services, Trust service providers, Trusts, Company Managers, and Corporate Service Providers. 1.6.2 86 Does the entity have any clients that are legal persons, that are Banking Institutions (excluding MSBs), or natural persons that are employed by Banking Institutions (excluding MSBs)? Please answer Yes or No . 1.6.3 87 Banking Institutions (excluding MSBs) - Number of Clients. Enter the number of clients the entity has, that are legal persons or legal arrangements and are banking institutions (excluding MSBs), or natural persons that are employed by Banking Institutions (excluding MSBs). 1.6.4 88 Does the entity have any clients that are legal persons operating as Other Financial Regulated Businesses, or natural persons employed by Other Financial Regulated Businesses not listed in this section? Please answer Yes or No . 1.6.5 89 Other Financial Regulated Business - Number of Clients. Enter the number of clients the entity has, that are legal persons or legal arrangements operating as Other Financial Regulated Business or natural persons that are employed by Other Financial Regulated Businesses not mentioned above. 1.6.6 90 Does the entity have any clients that are legal persons operating in Financial Leasing, or natural persons employed by Financial Leasing? Please answer Yes or No . 1.6.7 91 Financial Leasing- Number of Clients. Enter the number of clients the entity has, that are legal persons or legal arrangements operating as Financial Leasing companies or natural persons that are employed by Financial Leasing companies. 1.6.8 92 Does the entity have any clients that are legal persons operating as Money Lending, or natural persons employed by Money Lending? Please answer Yes or No . 1.6.9 93 Money Lending - Number of Clients. Enter the number of clients the entity has, that are legal persons or legal arrangements and are Money Lending institutions, and / or natural persons that are employed by Money Lending institutions. 1.6.10 94 Does the entity have any clients that are legal persons operating as Accountants (Audit / Assurance / Bookkeeping / Insolvency), or natural persons employed as Accountants? Please answer Yes or No . 1.6.11 95 Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Number of Clients. Enter the number of clients the entity has, that are legal persons or legal arrangements and are Accountants (Audit / Assurance / Bookkeeping / Insolvency), and/ or natural persons that are employed by Accountants (Audit

/ Assurance / Bookkeeping / Insolvency). 1.6.12 96 Does the entity have any clients that are legal persons operating in the Fintech industry, or natural persons employed in the Fintech industry? Please answer Yes or No . 1.6.13 97 Fintech - Number of Clients. Enter the number of clients the entity has, that are legal persons or legal arrangements operating in the Fintech industry, and natural persons that are employed by institutions in the Fintech industry. 1.6.14 98 Nature of Business / Source of Funding: Enter the total number of clients that are legal persons of, or natural persons Enter the total number of clients which fall within the list of the sectors, broken down by nationality or country of incorporation / registration of the clients as at the end of the reporting period. Version: 1.3 AML Survey Completion Guide Banking Page 30 of 66 employed in, the following sectors, broken down by nationality or country of incorporation of the clients: Legal Practitioners Dealers in Precious Metals and Stones Money Service Business (MSBs) Virtual Asset Service Providers (VASPs) High Value Dealers Trust Service Providers, Company Managers or Corporate Service Providers Import/Export industry Shipping and Transport of Goods 1.6.15 99 Does the entity have any clients that are legal persons operating as Legal Practitioners, or natural persons employed as Legal Practitioner? Please answer Yes or No 1.16.16 100 Legal Practitioners Number of Clients Enter the number of clients the entity has, that are legal persons or legal arrangements operating as Legal Practitioners, and natural persons that are employed by Legal Practitioners. 1.16.17 101 Does the entity have any clients that are legal persons operating as Dealers in Precious Metals and Stones, or natural persons employed by Dealers in Precious Metals and Stones? Please answer Yes or No 1.16.18 102 Dealers in Precious Metals and Stones Number of Clients Enter the number of clients the entity has, that are legal persons or legal arrangements operating as Dealers in Precious Metals and Stones, and natural persons that are employed by Dealers in Precious Metals and Stones. 1.6.19 103 Does the entity have any clients that are legal persons operating as Money Services Businesses, or natural Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Banking Page 31 of 66 persons that are employed by Money Services Businesses? 1.6.20 104 Money Services Business - Number of Clients. Enter the number of clients the entity has, that are legal persons or legal arrangements operating in the Money Services Business, and / or are natural persons that are employed in the Money Services Business. 1.6.21 105 Does the entity have any clients that are legal persons or arrangements operating as a Virtual Asset Product or Service, or natural persons employed / earned income through Virtual Asset Products or Services? Please answer Yes or No . 1.6.22 106 Virtual Asset Service Providers - Number of Clients. Enter the number of clients the entity has, that are legal persons or legal arrangements offering virtual assets products and services, and natural persons that are employed by, or earned income through virtual asset products and services. 1.6.23 107 Does the entity have any clients that are legal persons operating as High Value Dealers or natural persons employed by High Value Dealers? Please answer Yes or No . 1.6.24 108 High Value Dealers - Number of Clients. Enter the number of clients the entity has, that are legal persons or legal arrangements operating as High Value Dealers, and natural persons that are employed by High Value Dealers. 1.6.25 109 Does the entity have any clients that are legal persons or arrangements operating as Trust Service Providers, Company Managers, or Corporate Service Providers, or natural persons employed by Trust service providers, Company Managers, or Corporate Service Providers? Please answer Yes or No . 1.6.26 110 Trust service providers, Company Managers, or Enter the number of clients the entity has, that are legal persons or legal Version: 1.3 AML Survey Completion Guide Banking

Page 32 of 66 Corporate Service Providers - Number of Clients. arrangements operating as a Trust service provider, Company Manager, or Corporate Service Providers, and natural persons that are employed by Trust service providers, Company Managers, or Corporate Service Providers. 1.6.27 111 Does the entity have any clients that are legal persons operating in the Import / Export Industry, or natural persons employed by the Import / Export Industry? Please answer Yes or No . 1.6.28 112 Import / Export - Number of Clients. Enter the number of clients the entity has, that are legal persons or legal arrangements operating in the Import / Export business, or Corporate Service Providers, and natural persons that are employed within the Import / Export industry. 1.6.29 113 Does the entity have any clients that are legal persons operating in the Shipping and Transport of Goods industry, or natural persons employed by the Shipping and Transport of Goods industry? Please answer Yes or No . 1.6.30 114 Shipping and Transport of Goods - Number of Clients. Enter the number of clients the entity has, that are legal persons or legal arrangements operating in the Shipping and Transport of Goods business, or Corporate Service Providers, and natural persons that are employed within the Shipping and Transport of Goods industry. 1.6.31 115 Nature of Business / Source of Funding: Enter the total number of clients that are legal persons of, or natural persons employed in, the following sectors, broken down by nationality or country of incorporation of the clients: Real Estate Agents/Brokers Gambling Business Adult Entertainment Industry Provide the total number of clients which fall within the list of sectors, broken down by nationality or country of incorporation of the clients, as at the end of the reporting period. Version: 1.3 AML Survey Completion Guide Banking Page 33 of 66 Defence Industry Oil and Gas Industry Mining Construction / Development Retail / Restaurant Cannabis Industry 1.6.32 116 Does the entity have any clients that are legal persons operating as Real Estate Agents / Brokers, or natural persons employed as Real Estate Agents / Brokers? Please answer Yes or No . 1.6.33 117 Real Estate Agents / Brokers - Number of Clients. Enter the number of clients the entity has, that are legal persons or legal arrangements operating as Real Estate Agents / Brokers, and natural persons that are employed by Real Estate Agents / Brokers. 1.6.34 118 Does the entity have any clients that are legal persons are operating in the Gambling business (including online gambling), or natural persons employed by a Gambling business? Please answer Yes or No . 1.6.35 119 Gambling business (including online gambling) - Number of Clients. Enter the number of clients the entity has, that are legal persons or legal arrangements operating in the Gambling business (including online gambling), and natural persons that are employed in the Gambling business (including online gambling). 1.6.36 120 Does the entity have any clients that are legal persons operating in the adult entertainment industry, or natural persons employed in the adult entertainment industry? Please answer Yes or No . 1.6.37 121 Adult Entertainment - Number of Clients. Enter the number of clients the entity has, that are legal persons or legal arrangements operating in the Adult Entertainment Industry, and natural persons that are employed in the Adult Entertainment Industry. 1.6.38 122 Does the entity have any Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Banking Page 34 of 66 clients that are legal persons operating in the Defence Industry, or natural persons employed by the Defence Industry? 1.6.39 123 Defence Industry - Number of Clients. Enter the number of clients the entity has, that are legal persons or legal arrangements operating in the Defence Industry, and natural persons that are employed in the Defence Industry. 1.6.40 124 Does the entity have any clients that are legal persons operating in the Oil and Gas Industry, or natural persons employed by the Oil and Gas Industry? Please answer

Yes or No . 1.6.41 125 Oil and Gas Industry - Number of Clients. Enter the number of clients the entity has, that are legal persons or legal arrangements operating in the Oil and Gas Industry, and natural persons that are employed in the Oil and Gas Industry. 1.6.42 126 Does the entity have any clients that are legal persons in the Mining Industry, or natural persons employed by the Mining Industry? Please answer Yes or No . 1.6.43 127 Mining Industry - Number of Clients. Enter the number of clients the entity has, that are legal persons or legal arrangements operating in the Mining Industry, and natural persons that are employed in the Mining Industry. 1.6.44 128 Does the entity have any clients that are legal persons operating in the Construction / Development industry, or natural persons employed in the Construction / Development industry? Please answer Yes or No . 1.6.45 129 Construction / Development - Number of Clients. Enter the number of clients the entity has, that are legal persons or legal arrangements operating in the Construction / Development industry, and natural persons that are employed in the Construction / Development industry. 1.6.46 130 Does the entity have any clients that are legal persons Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Banking Page 35 of 66 operating in the Retail & Restaurant Business, or natural persons employed in the Retail & Restaurant Business? 1.6.47 131 Retail & Restaurant Business - Number of Clients. Enter the number of clients the entity has, that are legal persons or legal arrangements operating in the Retail & Restaurant Business, and natural persons that are employed in the Retail & Restaurant Business. 1.6.48 132 Does the entity have any clients that are legal persons that are operating in the Cannabis Production & Distribution industry, or natural persons employed in the Cannabis Production & Distribution industry? Please answer Yes or No . 1.6.49 133 Cannabis Production & Distribution - Number of Clients. Enter the number of clients the entity has, that are legal persons or legal arrangements operating in Cannabis Production & Distribution Business, and natural persons that are employed in the Cannabis Production & Distribution industry. 1.6.50 134 Does the entity have any clients that are legal persons of Unknown Businesses, or natural persons employed in Unknown Professions or Industries? Please answer Yes or No . 1.6.51 135 Unknown Businesses and Professions - Number of Clients. Enter the number of clients the entity has, that are legal persons or legal arrangements of Unknown Businesses and Professions, and natural persons that are employed in Unknown Businesses and Professions, broken down by the nationality or jurisdiction of incorporation / formation of the client. Unknown businesses and professions are 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. 1.6.52 136 Does the entity have any clients where their nature of business / source of funding is not listed in a category Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Banking Page 36 of 66 above? 1.6.53 137 Other - Not mentioned above - Number of Clients. Enter the number of clients the entity has, that are legal persons or legal arrangements operating in known business, not mentioned above, or natural persons that are employed in known businesses/industries, not mentioned above. 1.7.1 138 Source of Funds Value of Client Assets. Enter the total value of client assets for clients that are legal persons of, or are natural persons employed in, the following sector: Banking Institutions Other Financial regulated Business* Financial Leasing Money Lending Accountants Fintech *excluding MSBs, VASP Products and Services Providers, and Trusts, Company Managers, or Corporate Service Providers." Enter the total value of client assets, including on deposit, of the clients that are legal persons operating as, and natural persons employed in the listed sectors. 1.7.2 139 Banking Institutions (excluding MSBs) - Value of Client Assets. Enter

the value of client assets, including on deposit, of clients that are legal persons operating as Banking Institutions (excluding MSBs), and natural persons that are employed in Banking Institutions (excluding MSBs). 1.7.3 140 Other Financial Regulated Business - Value of Client Assets. Enter the value of client assets, including on deposit, of the clients that are legal persons operating as Other Financial Regulated Business, not already mentioned in this section, and natural persons that are employed in these Other Financial Regulated Business. 1.7.4 141 Financial Leasing - Value of Client Assets. Enter the value of client assets, including on deposit, of the clients that are legal persons operating in the Financial Leasing business, and natural persons that are employed in the Financial Leasing business. 1.7.5 142 Money Lending- Value of Client Assets. Enter the value of client assets, including on deposit, of the clients that are legal persons operating in the Money Lending business, and natural persons that are employed by Money Lending businesses. 1.7.6 143 Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Value of Client Assets. Enter the value of client assets, including on deposit, of the clients that are legal persons operating as Accountants (Audit / Assurance / Bookkeeping / Insolvency), and natural persons that are employed by Accountants (Audit / Assurance / Bookkeeping / Insolvency). 1.7.7 144 Fintech - Value of Client Assets. Enter the value of client assets, including on deposit, of the clients that are legal persons operating in the Fintech industry, and natural persons that are employed in the Fintech industry. 1.7.8 145 Source of Funds Value of Client Assets. Enter the total value of client assets for clients that are legal persons of, or are natural persons employed in, the following sector: Legal Practitioners Dealers in Precious Metals and Stones MSBs VASPs High Value Dealers Trust service providers, Company Managers or Corporate Service Providers Import/Export industry Shipping and Transport of Goods Enter the total value of client assets, including on deposit, of the clients that are legal persons of, and are natural persons employed in the listed sectors. 1.7.9 146 Legal Practitioners Value of Client Assets. Enter the value of client assets, including on deposit, of the clients that are legal persons operating as Legal Practitioners, and natural persons that are employed by Legal Practitioners. 1.7.10 147 Dealers in Precious Metals and Stones Enter the value of client assets, including on deposit, of clients that are legal persons operating as Dealers in Precious Metals and Stones, and natural persons that are employed by Dealers in Precious Metals and Stones. Version: 1.3 AML Survey Completion Guide Banking Page 38 of 66 1.7.11 148 Money Services Business - Value of Client Assets. Enter the value of client assets, including on deposit, of clients that are legal persons operating in the Money Services Business, and natural persons that are employed in the Money Services Business. 1.7.12 149 Virtual Asset Service Providers - Value of Client Assets. Enter the value of client assets, including on deposit, of clients that are legal persons or legal arrangements offering virtual asset products and services, and natural persons that are employed by providers of virtual asset products and services. 1.7.13 150 High Value Dealers - Value of Client Assets. Enter the value of client assets, including on deposit, of clients that are legal persons operating as High Value Dealers, and natural persons that are employed by High Value Dealers. 1.7.14 151 Trust service providers, Company Managers and Corporate Service Providers - Value of Client Assets. Enter the value of client assets, including on deposit, of clients that are legal persons or legal arrangements operating as Trust service providers, Company Managers and Corporate Service Providers, and natural persons that are employed in by Trust service providers, Company Managers or Corporate Service Providers. 1.7.15 152 Import / Export - Value of Client Assets. Enter the value of

client assets, including on deposit, of clients that are legal persons operating in the Import / Export Industry, and natural persons that are employed in the Import / Export Industry.

1.7.16 153 Shipping and Transport of Goods - Value of Client Assets. Enter the value of client assets, including on deposit, of clients that are legal persons operating in the Shipping and Transport of Goods Industry, and natural persons that are employed in the Shipping and Transport of Goods Industry.

1.7.17 154 Source of Funds Value of Client Assets Enter the total value of client assets for clients that are legal persons of, or are natural persons employed in, Enter the total value of client assets, including on deposit, of the clients that are legal persons of, and are natural persons employed in the listed sectors.

Version: 1.3 AML Survey Completion Guide Banking Page 39 of 66 the following sector:
Real Estate Agents/Brokers Gambling Business Adult Entertainment Industry Defence Industry Oil and Gas Industry Mining Construction / Development Retail / Restaurant Cannabis Industry

1.7.18 155 Real Estate Agents / Brokers - Value of Client Assets. Enter the value of client assets, including on deposit, of clients that are legal persons operating as Real Estate Agents / Brokers, and natural persons that are employed by Real Estate Agents / Brokers.

1.7.19 156 Gambling business (including online gambling) - Value of Client Assets. Enter the value of client assets, including on deposit, of clients that are legal persons operating in Gambling business (including online gambling), and natural persons that are employed in the Gambling business (including online gambling).

1.7.20 157 Adult Entertainment - Value of Client Assets. Enter the value of client assets, including on deposit, of clients that are legal persons operating in the Adult Entertainment business, and natural persons that are employed in the Adult Entertainment business.

1.7.21 158 Defence Industry - Value of Client Assets. Enter the value of client assets, including on deposit, of clients that are legal persons operating in the Defence Industry, and natural persons that are employed in the Defence Industry.

1.7.22 159 Oil and Gas Industry - Value of Client Assets. Enter the value of client assets, including on deposit, of clients that are legal persons operating in the Oil and Gas Industry, and natural persons that are employed in the Oil and Gas Industry.

1.7.23 160 Mining Industry - Value of Client Assets. Enter the value of client assets, including on deposit, of clients that are legal persons operating in the Mining Industry, and natural persons that are employed in the Mining Industry.

Version: 1.3 AML Survey Completion Guide Banking Page 40 of 66

1.7.24 161 Construction / Development - Value of Client Assets. Enter the value of client assets, including on deposit, of clients that are legal persons operating in the Construction / Development business, and natural persons that are employed in the Construction / Development industry.

1.7.25 162 Retail & Restaurant Business - Value of Client Assets. Enter the value of client assets, including on deposit, of clients that are legal persons operating in the Retail & Restaurant Business, and natural persons that are employed in the Retail & Restaurant Business.

1.7.26 163 Cannabis Production & Distribution - Value of Client Assets. Enter the value of client assets, including on deposit, of clients that are legal persons operating in the Cannabis Production & Distribution business, and natural persons that are employed in the Cannabis Production & Distribution business.

1.7.27 164 Industry / profession not known or not recorded - Value of Client Assets. Enter the value of client assets, including on deposit, of clients that are legal persons operating in unknown or unrecorded Industries / Professions, and natural persons that are employed in unknown or unrecorded Industries / Professions.

1.7.28 165 Other - Not listed above - Value of Client Assets. Enter the value of client assets, including on deposit, of clients that are legal persons operating in Known Businesses /industries/ Professions not listed above, and natural persons that are employed

in Known Businesses/Industries/Professions, not listed above. 1.8.1 166 Does the entity have any comments or feedback for this tab? Please answer Yes or No . 1.8.2 167 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. 2.1.1 168 Does the entity provide financial products in the form of FOREX? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Banking Page 41 of 66 2.1.2 169 FOREX - Number of Transactions. Enter the number of FOREX transactions processed during the reporting period. 2.1.3 170 FOREX - Value of Funds Transferred. Enter the total value of FOREX transactions processed during the reporting period. 2.1.4 171 Does the entity provide financial products in the form of Virtual Currency? Please answer Yes or No . 2.1.5 172 Virtual Currency - Number of Transactions. Enter the number of Virtual Currency transactions conducted, during the reporting period. 2.1.6 173 Virtual Currency - Value of Funds Transferred. Enter the total value of Virtual Currency transferred, during the reporting period. 2.1.7 174 Does the entity provide financial products in the form of Lending Trade Finance? Please answer Yes or No . 2.1.8 175 Lending Trade Finance - Number of Transactions. Enter the number of transactions processed for Lending Trade Finance, during the reporting period. 2.1.9 176 Lending Trade Finance - Value of Funds Transferred. Enter the total value of funds transferred for Lending Trade Finance, during the reporting period. 2.1.10 177 Does the entity provide financial products in the form of Prepaid Cards? Please answer Yes or No . 2.1.11 178 Prepaid Cards - Number of Transactions. Enter the number of transactions processed through Prepaid Cards, during the reporting period. 2.1.12 179 Prepaid Cards - Value of Funds Transferred. Enter the total value of funds transferred through Prepaid Cards, during the reporting period. 2.1.13 180 Does the entity offer Payable Through Accounts? Please answer Yes or No . 2.1.14 181 Payable Through Accounts Number of Clients. Enter the number of clients the entity offers services of payable through accounts. 2.1.15 182 Payable Through Accounts Number of Transactions. Enter the number of transactions conducted through Payable Through Accounts, during the reporting period. 2.1.16 183 Payable Through Accounts Enter the total value of transactions processed through Payable Through Accounts, during the reporting period. Version: 1.3 AML Survey Completion Guide Banking Page 42 of 66 Value of Transactions. 2.2.1 184 Does the entity provide financial products in the form of Omnibus Accounts? Please answer Yes or No . 2.2.2 185 Does the entity provide financial products in the form of Trust & Company Administration? Please answer Yes or No . 2.2.3 186 Does the entity provide financial products in the form of Trustee & Custodian Services? Please answer Yes or No . 2.2.4 187 Does the entity provide financial products in the form of Fund Management? Please answer Yes or No . 2.2.5 188 Does the entity provide financial products in the form of Investment Management? Please answer Yes or No . 2.2.6 189 Does the entity offer trading services or trading platforms to clients? Please answer Yes or No . 2.3.1 190 Does the entity facilitate payments on behalf of Clients in the form of Physical Cash? Please answer Yes or No . 2.3.2 191 Physical Cash - Number of Clients. Enter the number of clients that made payments in the form of Physical Cash during the reporting period. 2.3.3 192 Physical Cash - Number of Transactions. Enter the number of cash transactions processed on behalf of clients during the reporting period. Payments include those between the entity and the client and those conducted on behalf of the entity. 2.3.4 193 Physical Cash - Value of transactions. Enter the total value of cash transactions processed on behalf of clients during the reporting period. 2.3.5 194 Does the entity facilitate payments of Clients in the form of Virtual Currency? Please answer Yes or No .

2.3.6 195 Virtual Currency - Number of Clients. Enter the number of clients that conducted transactions in the form of Virtual Currency during the reporting period. Version: 1.3 AML Survey Completion Guide Banking Page 43 of 66

2.3.7 196 Virtual Currencies - Number of Transactions. Enter the number of Virtual Currency transactions clients conducted, during the reporting period.

2.3.8 197 Virtual Currencies - Value of Funds Transferred. Enter the value of virtual currency transactions processed by or on behalf of clients.

2.3.9 198 Does the entity facilitate payments of Clients via Third Parties? Please answer Yes or No .

2.3.10 199 Third Parties - Number of Clients. Enter the number of clients that conducted payments via Third Parties during the reporting period. Payments via third party means that the payment was paid to a third party not associated with the business relationship or transaction.

2.3.11 200 Third Parties - Number of Transactions. Enter the number of Third-Party transactions processed by clients during the reporting period.

2.3.12 201 Third Parties - Value of Transactions. Enter the value of transactions processed by clients during the reporting period, using payments via Third Parties.

2.3.13 202 Does the entity facilitate payments of Clients via Credit Card? Please answer Yes or No .

2.3.14 203 Credit Card Payments - Number of Clients. Enter the number of clients that made payments via Credit Card during the reporting period.

2.3.15 204 Credit Card Payments - Number of Transactions. Enter the number of transactions processed via credit card payments during the reporting period.

2.3.16 205 Credit Card Payments - Value of Transactions. Enter the value of Credit Card payments processed for clients during the reporting period.

2.3.17 206 Does the entity facilitate payments of Clients in the form of Wire Transfers? Please answer Yes or No .

2.3.18 207 Wire Transfers - Number of Clients. Enter the number of clients that made payments in the form of Wire Transfers during the reporting period. Version: 1.3 AML Survey Completion Guide Banking Page 44 of 66

2.3.19 208 Wire Transfers - Number of Transactions. Enter the number of Wire Transfer transactions that were conducted by clients, during the reporting period.

2.3.20 209 Wire Transfers - Value of Funds Transferred. Enter the value of Wire Transfer transactions conducted by clients during the reporting period.

2.3.21 210 Does the entity facilitate payments of Clients in the form of Internal Bank Transfers? Please answer Yes or No .

2.3.22 211 Internal Bank Transfers - Number of Clients. Enter the number of clients which conducted Internal Bank Transfers, during the reporting period.

2.3.23 212 Internal Bank Transfers - Number of Transactions. Enter the number of Internal Bank Transfer transactions conducted by clients, during the reporting period.

2.3.24 213 Internal Bank Transfers - Value of Funds Transferred. Enter the value of transactions conducted via Internal Bank Transfers by clients during the reporting period.

2.3.25 214 Does the entity facilitate payments of Clients in the form of Transfer of Securities? Please answer Yes or No .

2.3.26 215 Transfer of securities - Number of Clients. Enter the number of clients that made payments in the form of Transfer of Securities during the reporting period.

2.3.27 216 Transfer of securities - Number of Transactions. Enter the number transactions made by clients, during the reporting period, in the form of Transfer of Securities.

2.3.28 217 Transfer of securities - Value of Funds Transferred. Enter the value of funds transferred o by clients during the reporting period, by way of Transfer of Securities.

2.3.29 218 Does the entity facilitate payments of Clients in other forms not listed above? Please answer Yes or No .

2.3.30 219 Other Forms of Payment - Number of Clients. Enter the number of clients which made payments using other Forms of Payment not listed above during the reporting period.

2.3.31 220 Other Forms of Payment - Number of Transactions. Enter the number of transactions conducted by clients during the reporting period, using Other Forms of Payment

Version: 1.3 AML Survey Completion Guide Banking

Page 45 of 66 other than the ones listed above. 2.3.32 221 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. 2.3.33 222 Please indicate the types of Other Forms of Payment. List the Other Forms of Payment processed by clients during the reporting period, which are not listed above. 2.4.1 223 Does your entity accept Cash Deposits? Please answer Yes or No. 2.4.2 224 Total Number of Cash Deposits. Enter the number of cash deposits made, during the reporting period. 2.4.3 225 Cash Deposits - Total value of funds deposited. Enter the total value of cash deposits made, during the reporting period. 2.4.4 226 Total Number of Non-Account Based Cash Deposits. Enter the total number of Non-Account Based Cash Deposits, third-party deposits, made during the reporting period. 2.4.5 227 Total value of Non-Account Based cash deposits. Enter the value number of Non-Account Based Cash Deposits made, during the reporting period. 2.4.6 228 Number of Cash Deposits - PEPs. Enter the number of cash deposits made by PEPs, during the reporting period. 2.4.7 229 Cash Deposits - Total value of cash deposited by PEPs. Enter the total value of cash deposits made by PEPs, during the reporting period. 2.4.8 230 Number of Cash Deposits - HNWI's. Enter the number of cash deposits made by HNWI's, during the reporting period. 2.4.9 231 Cash Deposits - Total value of cash deposited by HNWI's. Enter the total value of cash deposits made by HNWI's, during the reporting period. 2.4.10 232 Number of Cash Deposits by Natural Persons > US \$10,000 (or equivalent). Enter the number of cash deposits made by Natural Persons greater than US\$10,000 (or equivalent), during the reporting period. 2.4.11 233 Total value of cash deposits - Natural Persons > US \$10,000 Enter the total value of cash deposits made by Natural Persons greater than US\$10,000 (or equivalent), during the reporting period. 2.4.12 234 Number Cash Deposits - Real Estate Agents & Brokers. Enter the number of cash deposits made by Real Estate Agents & Brokers, during Version: 1.3 AML Survey Completion Guide Banking Page 46 of 66 the reporting period. 2.4.13 235 Total value of cash deposits - Real Estate Agents & Brokers. Enter the total value of cash deposits made by Real Estate Agents & Brokers, during the reporting period. 2.4.14 236 Number of cash deposits - Dealers in Precious Metals and Stones. Enter the number of cash deposits made by Dealers in Precious Metals and Stones, during the reporting period. 2.4.15 237 Total value of cash deposits - Dealers in Precious Metals and Stones. Enter the total value of cash deposits made by Dealers in Precious Metals and Stones, during the reporting period. 2.4.16 238 Number of cash deposits - NPOs. Enter the number of cash deposits made by NPOs, during the reporting period. 2.4.17 239 Total value of cash deposits - NPOs. Enter the total value of cash deposits made by NPOs, during the reporting period. 2.4.18 240 Number of cash deposits - Foundations. Enter the number of cash deposits made by Foundations, during the reporting period. 2.4.19 241 Total value of cash deposits - Foundations. Enter the total value of cash deposits made by Foundations, during the reporting period. 2.4.20 242 Number of cash deposits - High Value Dealers. Enter the number of cash deposits made by High Value Dealers, during the reporting period. 2.4.21 243 Value of cash deposits - High Value Dealers. Enter the total value of cash deposits made by High Value Dealers, during the reporting period. 2.4.22 244 Number of cash deposits - Money Lenders. Enter the number of cash deposits made by Money Lenders, during the reporting period. 2.4.23 245 Total value of cash deposits - Money Lenders. Enter the total value of cash deposits made by Money Lenders, during the reporting period. 2.4.24 246 Number of Cash Deposits - Financial Lessors. Enter the number of cash deposits made by Financial Lessors, during the reporting period. 2.4.25 247 Total value of cash

deposits Financial Lessors. Enter the total value of cash deposits made by Financial Lessors, during the reporting period. Version: 1.3 AML Survey Completion Guide Banking Page 47 of 66

2.5.1 248 Does the entity offer correspondent banking services? Please answer Yes or No

2.5.2 249 Correspondent Banking Services Number of respondent institutions / clients. Enter the number of Respondents institutions (clients) that have been offered correspondent banking services by the entity at the end of the reporting period.

2.5.3 250 Respondent Institutions - Number of Transactions. Enter the total number of transactions conducted by Respondent Institutions, during the reporting period.

2.5.4 251 Respondent Institutions - Value of Funds Transferred. Enter the total value of funds transferred by Respondent Institutions, during the reporting period.

2.5.5 252 Non-Group Respondents - Number of Transactions. Enter the total number of transactions conducted by Non-Group Respondents, during the reporting period.

2.5.6 253 Non-Group Respondents - Value of Funds Transferred. Enter the total value of funds transferred by Non-Group Respondents, during the reporting period.

2.5.7 254 Respondent Institutions - Money Service Providers - Number of Transactions. Enter the number of transactions conducted by Respondent Institutions operating as Money Service Providers, during the reporting period.

2.5.8 255 Respondent - Money Service Providers - Value of Funds Transferred. Enter the value of funds transferred by Respondent Institutions operating as Money Service Providers, during the reporting period.

2.6.1 256 Total Number of Loans issued. Enter the total number of loans issued by the entity during the reporting period.

2.6.2 257 Total value of Loans issued. Enter the total value of loans issued by the entity during the reporting period.

2.6.3 258 Non-Group Loans - Number of Transactions. Enter the number of transactions processed for Non-Group Loans, during the reporting period.

2.6.4 259 Non-Group Loans - Total value of funds transferred. Enter the total value of funds transferred for Non-Group Loans, during the reporting period.

2.6.5 260 Non-Group Back-2-Back Loans - Number of Transactions. Enter the number of transactions processed for Non-Group Back-2-Back Loans, during the reporting period. Version: 1.3 AML Survey Completion Guide Banking Page 48 of 66

2.6.6 261 Non-Group Back-2-Back Loans - Total value of funds transferred. Enter the total value of funds transferred for Non-Group Back-2-Back Loans, during the reporting period.

2.6.7 262 Loans - PEPs - Number of Transactions. Enter the number of loan transactions processed PEPs, during the reporting period.

2.6.8 263 Loans - PEPs - Total value of funds transferred. Enter the total value of funds transferred as Loans to PEPs, during the reporting period.

2.6.9 264 Loans - High Net Worth Individuals - Number of Transactions. Enter the number of loan transactions processed for HNWI, during the reporting period.

2.6.10 265 Loans - High Net Worth Individuals - Total value of funds transferred. Enter the total value of funds transferred as Loans to HNWI, during the reporting period.

2.6.11 266 Loans - Ultra High Net Worth Individuals - Number of Transactions. Enter the number of loan transactions processed for UHNWI, during the reporting period.

2.6.12 267 Loans - Ultra High Net Worth Individuals - Total value of funds transferred. Enter the total value of funds transferred as Loans to UHNWI, during the reporting period.

2.6.13 268 Loans - Exempt Companies - Number of Transactions. Enter the number of loan transactions processed for Exempt Companies, during the reporting period.

2.6.14 269 Loans - Exempt Companies - Total value of funds transferred. Enter the total value of funds transferred as Loans to Exempt Companies, during the reporting period.

270 Do you have any comments or feedback for this tab? Enter Yes or No

271 Please use this area to provide any comments or feedback for this tab. If no feedback enter N/A .

3.1.1 272 Number of Clients - Direct - F2F, broken down by nationality or country of

incorporation of the client. Provide the total number of clients, in the entity's entire portfolio, that were onboarded via F2F methods, and not only those onboarded during the reporting period. F2F channels include Direct F2F; Referrals within Group F2F; Eligible Introducers - F2F; Other Introducers - F2F

Version: 1.3 AML Survey Completion Guide Banking Page 49 of 66

3.1.2 273 Number of Clients - Direct - Non-F2F, broken down by nationality or country of incorporation of the client. Enter the total number of clients which were onboarded using Non-Face-to-Face (Non-F2F) channels, broken down by nationality or country of incorporation of the client. Provide the total number of clients, in the entity's entire portfolio, that were onboarded via Non-F2F methods, and not only those onboarded during the reporting period. Example of Direct Non-F2F would include where the entity is onboarding clients through or ; however, they do not have Direct F2F contact with the clients.

3.1.3 274 Number of Clients via Online Platforms, broken down by nationality or country of incorporation of the client. Provide the total number of clients, in the entity's entire portfolio, that were onboarded via Online platforms, and not only those onboarded during the reporting period.

3.1.4 275 Number of Clients through Referrals within Group - F2F, broken down by nationality or country of incorporation of the client. Enter the number of clients which were onboarded during the reporting period, using referrals within Group - F2F, broken down by nationality or country of incorporation of the client. Provide the total number of clients, in the entity's entire portfolio, that were onboarded using referrals within Group F2F for the reporting period. Example of Group F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself have F2F interaction with the clients.

3.1.5 276 Number of Clients through Referrals within Group - Non F2F, broken down by nationality or country of incorporation of the client. Enter the number of clients that were onboarded, using referrals within Group and via a Non Face to Face channels for the reporting period. 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.

3.1.6 277 Number of Clients through Enter the number of clients that were

Version: 1.3 AML Survey Completion Guide Banking Page 50 of 66

Eligible Introducers Non-F2F, broken down by nationality or country of incorporation of the client. onboarded during the reporting period, through Eligible Introducers, broken down by nationality or country of incorporation of the client. 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.

3.1.7 278 Number of Clients through Other Introducers Non-F2F, broken down by nationality or country of incorporation of the client. Provide the total number of clients, in the entity's entire portfolio, that were onboarded through Other Introducers Non-F2F for the reporting period.

3.1.8 279 Number of Clients via Online Platforms, broken down by nationality or country of incorporation of the client. Provide the total number of clients, in the entity's entire portfolio, that were onboarded via Online platforms during the reporting period.

3.2.1 280 Has the entity outsourced the role of AML Compliance Officer within the reporting period? Please answer Yes or No .

3.2.2 281 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.

3.2.3 282 What was the country of residency of the AML Compliance Officer at the

end of the reporting period? Enter the country of residency of the AML Compliance Officer at the end of the reporting period. 3.2.4 283 How many AML Compliance Officers has the entity had in the reporting period and the previous 2 years? If no turnover of the AML Compliance Officer role in the three-year period, answer "1". Version: 1.3 AML Survey Completion Guide Banking Page 51 of 66 3.2.5 284 Has the entity outsourced the role of Money Laundering Reporting Officer within the reporting period? Please answer Yes or No . 3.2.6 285 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 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. 3.2.7 286 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. 3.2.8 287 How many Money Laundering Reporting Officers did the entity have in the reporting period and the previous 2 years? If no turnover of the Money Laundering Reporting Officers role in the three-year period, answer "1". 3.2.9 288 Has the entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period? Please answer Yes or No . 3.2.10 289 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. 3.2.11 290 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. Version: 1.3 AML Survey Completion Guide Banking Page 52 of 66 3.2.12 291 How many Deputy Money Laundering Reporting Officers did the entity have in the reporting period and the previous 2 years? If no turnover of the Deputy Money Laundering Reporting Officers role in the three-year period, answer "1". 3.2.13 292 Has the entity outsourced the function of Targeted Financial Sanction screening within the reporting period? Please answer Yes or No . 3.2.14 293 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. 3.2.15 294 What was the outsourcing country of the Targeted Financial Sanction screening function at the end of the reporting period? Enter the country that the entity outsourced the Targeted Financial Sanction screening function to, during the reporting period. 3.2.16 295 How many TFS Screening platforms did the entity have in the reporting period and the previous 2 years? If no turnover of the Targeted Financial Sanction screening function in the three- year period, answer "1". 3.2.17 296 Has the entity outsourced the function of transaction monitoring within the reporting period? Please answer Yes or No . 3.2.18 297 To whom has the transaction monitoring function been outsourced? If outsourced, select the status that best describes the outsource relationship Transaction Monitoring function: Member within Group 3rd Party and Member within Group 3rd Party Select 3rd Party and Member

within Group", Version: 1.3 AML Survey Completion Guide Banking Page 53 of 66

AML Controls Questions: No. Question Question Description/Explanation in cases where the Transaction Monitoring services turnover that includes one of each within the reporting period.

3.2.19 298 What was the outsourcing country of the transaction monitoring function at the end of the reporting period? Enter the country the entity outsourced the Transaction Monitoring function to at the end of the reporting period.

3.2.20 299 How many Transaction monitoring platforms did the entity have in the reporting period and the previous 2 years? If no turnover of the Transaction Monitoring platform in the three-year period, answer "1".

3.3.1 300 In which countries, by percentage of equity ownership, are all shareholders of the entity located. Enter 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. For publicly listed entities please list beneficial ownership of 10% or more.

3.3.2 301 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.

3.3.3 302 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.

3.3.4 303 In which country is the parent or holding company incorporated? Enter the country the parent or holding company is incorporated.

3.4.1 304 Does the entity have any comments or feedback for this tab? Please answer Yes or No .

3.4.2 305 Please use this area to provide any comments or feedback for this tab. Use this area to provide any comments or feedback for this tab. Please enter 'NA' if no comment.

Version: 1.3 AML Survey Completion Guide Banking Page 54 of 66

No. 1.1.1 306 Does the Governing Body receive comprehensive reports, information and statistics regarding ML/TF/PF risks and issues? Please answer Yes or No .

1.1.2 307 Does the Governing Body review all AML/CFT/CPF related policies and procedures periodically? Please answer Yes or No .

1.1.3 308 What is the frequency, in months, that AML/CFT/CPF and Sanctions matters are reported to the Board? Enter the frequency in number of months.

1.1.4 309 Is there an audit risk and compliance subcommittee? Please answer Yes or No .

1.1.5 310 Is there an approved Charter for the Governing Body and Sub-Committees? Please answer Yes or No .

1.1.6 311 Is the entity subject to group wide governance practices? Please answer Yes or No .

1.1.7 312 Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body? Please answer Yes or No .

1.1.8 313 Is AML/CFT/CPF, including regulatory audit findings, a standard agenda item at Board/Principal and/or Board committee meetings? Please answer Yes or No .

1.1.9 314 Does the Board / Governing Body ensure that recommendations made by the internal and external auditors and regulators to address AML/CFT/CPF and Sanctions findings are acted upon in a timely manner? Please answer Yes or No .

1.1.10 315 Has the entity, or its directors, shareholders, beneficial owners, or senior officers been denied an application by any regulatory body? Please answer Yes or No .

1.1.11 316 Provide the country of jurisdiction. Enter the names of the jurisdiction(s) in which the entity, or its directors, shareholders, beneficial owners or senior officers were denied an application by any regulatory body.

Version: 1.3 AML Survey Completion Guide Banking Page 55 of 66

1.1.12 317 Are any of the entity's AML Officers, Shareholders, Beneficial Owners, Directors, or Senior Management PEPs? Please answer Yes or No .

1.1.13 318 Does the Board ensure that the AMLCO/MLRO receive the appropriate training? Please answer Yes or No .

1.2.1 319 Has an AML Compliance Officer been appointed? Please answer Yes or No .

1.2.2 320 Has an MLRO been appointed? Please answer Yes or No .

1.2.3 321 Is a Deputy MLRO appointed? Please answer Yes or No .

1.2.4 322 Is

the AMLCO employed at a managerial level of the company? Please answer Yes or No .

1.2.5 323 For reporting lines, does the AMLCO report to the Governing Body? Please answer Yes or No .

1.2.6 324 Does the AMLCO maintain independence from revenues related / client facing activities? Please answer Yes or No .

1.2.7 325 Does the AMLCO have sufficient compliance/AML skills and experience to perform their function? Please answer Yes or No .

1.2.8 326 Does the AMLCO report to the Board on AML/CFT/CPF related issues and on the adequacy of the AML/CFT/CPF framework? Please answer Yes or No .

1.2.9 327 Does the AMLCO conduct any sample testing and review any exception reports to identify potential AML/CFT/CPF compliance breaches? Please answer Yes or No .

1.2.10 328 Does the AMLCO provide oversight of the AML/CFT/CPF and Sanctions risk assessment framework and procedures? Please answer Yes or No .

1.2.11 329 Does the MLRO maintain independence from revenues related / client facing activities? Please answer Yes or No .

1.2.12 330 Does the MLRO report to the Board on AML/CFT/CPF related issues and on the adequacy of the AML/CFT/CPF framework? Please answer Yes or No .

Version: 1.3 AML Survey Completion Guide Banking Page 56 of 66

1.3.1 331 Has the entity developed and implemented AML/CFT/CPF and Sanctions training and awareness programme? Please answer Yes or No .

1.3.2 332 Have the directors received AML/CFT/CPF and Sanctions training during the reporting period? Please answer Yes or No .

1.3.3 333 Has the AML Compliance Officer received specialized compliance/AML/CFT/CPF training over the last year relevant to the current position? Please answer Yes or No .

1.3.4 334 Has the MLRO received specialized compliance/AML/CFT/CPF training over the last year relevant to the current position? Please answer Yes or No .

1.3.5 335 Has the DMLRO received specialized compliance/AML/CFT/CPF training over the last year relevant to the current position? Please answer Yes or No .

1.3.6 336 Does the AMLCO ensure that ongoing training programs are kept up to date and relevant? Please answer Yes or No .

1.3.7 337 Are changes to policy and procedures communicated to all staff/directors and senior management? Please answer Yes or No .

1.3.8 338 Does the entity assess AML/CFT/CPF and Sanctions knowledge of its employees? Please answer Yes or No .

1.3.9 339 What percentage of employees/agents/directors that have NOT been exposed to AML/CFT/CPF training by the company during the reporting period? Enter the percentage of employees/ agents/ directors that have NOT been exposed to AML/CFT/CPF training by the entity during the reporting period.

1.3.10 340 Does the AMLCO organize or ensure AML/CFT/CPF and Sanctions training is conducted for all staff annually? Please answer Yes or No .

1.4.1 341 Does the entity have an internal audit department / unit / function with oversight over AML functions? Please answer Yes or No .

Version: 1.3 AML Survey Completion Guide Banking Page 57 of 66

1.4.2 342 Is there a developed Internal Audit plan, with focus on AML/CFT/CPF and Sanctions, reviewed by the Board? Please answer Yes or No .

1.4.3 343 Is the Internal Audit plan approved by the Board? Please answer Yes or No .

1.4.4 344 Does the internal AML audit include reviews of the AML/CFT/CPF related policies, procedures and processes? Please answer Yes or No .

1.4.5 345 Has the AML audit function performed an AML/CFT/CPF and Sanctions audit and issued a report for conclusions and recommendations? Please answer Yes or No .

1.4.6 346 What is the frequency, in months, of the internal AML audit for the AML/CFT/CPF and Sanctions Programme? Enter the frequency, in months, of how often an internal AML audit for the AML/CFT/CPF and Sanctions programme is conducted.

1.4.7 347 Does the Board review the AML audit program? Please answer Yes or No .

1.4.8 348 Enter the frequency, in months, of the

Board review of the AML audit program? Enter the frequency, in months, of the Board review of the AML audit program. 1.4.9 349 Where applicable, does the internal audit include testing on functions which are outsourced? Please select Yes, No, or Not Applicable. 1.4.10 350 Where applicable, does the internal audit include testing of EI relationships? Please enter Yes, No, or Not Applicable. 1.4.11 351 Does the Internal Audit include testing for the AML/CFT/CPF and Sanctions training function? Please answer Yes or No. 1.4.12 352 Does the Internal Audit include testing for the entity's TFS and PF controls? Please answer Yes or No. 1.5.1 353 Does the entity conduct a business risk assessment which considers ML/TF/PF and Sanctions risk factors? Please answer Yes or No. 1.5.2 354 Does the entity employ a Risk Based Methodology when assessing and allocating oversight of its clients? Please answer Yes or No. Version: 1.3 AML Survey Completion Guide Banking Page 58 of 66 1.5.3 355 Does the entity consider the ML/TF/PF risks of the clients, (including UBOs, in their risk assessment? Please answer Yes or No. 1.5.4 356 Does the entity consider the ML/TF/PF geographic location (also of counterparties and affiliates, branches, subsidiaries etc.) in their risk assessment? Please answer Yes or No. 1.5.5 357 Does the entity consider the ML/TF/PF products and services (existing and new) in their risk assessment? Please answer Yes or No. 1.5.6 358 Does the entity consider the ML/TF/PF delivery channels (existing and new) in their risk assessment? Please answer Yes or No. 1.5.7 359 Does the entity ensure ML/TF/PF business risk assessments are done / updated prior to the launch of any new products/services/delivery channels/technologies? Please answer Yes or No. 1.5.8 360 Does the entity consider the ML/TF/PF technology (existing and new) in their risk assessment? Please answer Yes or No. 1.5.9 361 Does the entity consider Sanctions risk factors in their risk assessment? Please answer Yes or No. 1.5.10 362 Does the entity consider PF risk factors in their risk assessment? Please answer Yes or No. 1.5.11 363 Does the entity consider outsourcing risk factors in its risk assessment? Please answer Yes or No. 1.5.12 364 Does the entity take their nature, size and complexity into consideration and consider the need for other risk factors, other than those listed above, when developing their business risk assessment? Please answer Yes or No. 1.5.13 365 How often, in months, do you review High-Risk relationships/accounts? Please respond using the following: Never, More than 18 months, 7 12 months, 1 6 months. Version: 1.3 AML Survey Completion Guide Banking Page 59 of 66 1.5.14 366 How often, in months, do you review medium-Risk relationships/accounts? Please respond using the following: Never, More than 18 months, 7 12 months, 1 6 months. 1.5.15 367 How often, in months, do you review low-Risk relationships/accounts? Please respond using the following: Never, More than 18 months, 7 12 months, 1 6 months. 1.6.1 368 Does the entity rely on Group AML/CFT policies and procedures? Please answer Yes or No. 1.6.2 369 If yes, has the entity conducted a GAP Analysis to identify whether the AML/CFT programme complies with Cayman's legislation and regulatory framework? Please answer Yes or No. 1.6.3 370 Has the Board, or governing body, ensured that necessary amendments are made to the entity's policies and procedures for alignment with the requirements in the Cayman Islands? Please answer Yes or No. 1.6.4 371 Does the entity have Board, or governing body, approved policies and procedures for Customer Due Diligence measures i.e. customer identification and verification? Please answer Yes or No. 1.6.5 372 Does the entity have Board, or governing body, approved policies and procedures for identification of high risk customers inc. PEPs? Please answer Yes or No. 1.6.6 373 Does the entity have Board, or governing body, approved policies and procedures for establishing Source of Funds? Please answer Yes or No. 1.6.7 374

Does the entity have Board, or governing body, approved policies and procedures for employee screening? Please answer Yes or No . 1.6.8 375 Does the entity have Board or governing body approve policies and procedures for training of staff? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Banking Page 60 of 66 1.6.9 376 Does the entity have Board or governing body approved policies and procedures for ensuring confidential sharing and preservation of data within the group? Please answer Yes or No . 1.6.10 377 Does the entity have policies and procedures on collecting due diligence on counterparties and business associates? Please answer Yes or No . 1.6.11 378 Does the entity have procedures for declining, de-risking, terminating or restricting business relationships due to AML/CFT/CPF and Sanctions related reasons? Please answer Yes or No . 1.6.12 379 Enter the total number of business relationships or clients' accounts that were de-risked /declined /terminated/restricted due to AML/CFT/CPF and Sanctions concerns for the reporting period. 1.7.1 380 Does the entity have a screening process? Please answer Yes or No . 1.7.2 381 Is the screening process manual, automated or a combination? Select which best applies: Manual, Automated, or Automated with Manual Checks. 1.7.3 382 Is the screening process fully or partially outsourced? Please select Fully or Partially . 1.7.4 383 When designated lists are updated, does the screening process reflect these updates within 24 hours? Please answer Yes or No . 1.7.5 384 Is sanctions monitoring done in real time or after the event? Select what applies: No process , After the event , or Real time . 1.7.6 385 Is the customer and counterparty database screened against the designated H.M. Treasury list? Please answer Yes or No . 1.7.7 386 Are procedures in place to ensure customers / counterparties are screened prior to payouts (remittance of funds)? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Banking Page 61 of 66 1.7.8 387 Does the entity have Asset Freeze procedures? Please answer Yes or No . 1.7.9 388 Have the assets of any customers identified as persons or entities designated by the United Nations Security Council or by the High Court as terrorists or for PF been frozen? Please answer Yes or No . 1.7.10 389 Does the entity maintain a report of results of alerts, methodology of clearing alerts, and those positive matches resulting of sanction screening? Please answer Yes or No . 1.7.11 390 Does the entity have systems and procedures in place to determine whether the entity or any of its affiliates, subsidiaries or counterparties is located within or operating from any country/jurisdiction that is subject to economic or financial sanctions? Please answer Yes or No . 1.7.12 391 Does the entity have systems and procedures in place to determine whether the entity or any of its affiliates, subsidiaries or counterparties is engaged in transactions, investments, business or other dealings that directly or indirectly involve or benefit any country/jurisdiction that is subject to economic or financial sanctions? Please answer Yes or No . 1.7.13 392 Does the entity have policies and procedures in place to ensure transactions conducted with customers / counterparties of countries surrounding sanctioned jurisdictions are scrutinized to ensure those the unlisted countries are not being used as conduits to evade targeted financial sanctions and proliferation alerts / risks? Please answer Yes or No . 1.8.1 393 Does the entity have transaction monitoring policies and procedures developed commensurate to its operations? Please answer Yes or No . 1.8.2 394 Does the entity have policies and Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Banking Page 62 of 66 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? 1.8.3 395 Does the entity have in place an

automated system for monitoring transactions for potential suspicion and reporting suspicious transactions? Please answer Yes or No . 1.8.4 396 Is there a requirement for senior management approval before establishing high risk business relationships i.e. with PEPs? Please answer Yes or No . 1.8.5 397 Does the entity have EDD procedures? Please answer Yes or No . 1.8.6 398 Does the entity apply EDD on customers and counterparties based in higher-risk countries? Please answer Yes or No . 1.8.7 399 Where high risk clients are identified, did the entity conduct EDD measures for every transaction such customers carry out? Please answer Yes or No . 1.8.8 400 Enter the total number of Alerts resulting in Suspicious Activity Reports related to ML/TF/PF and Sanctions matters identified during transaction monitoring. The total number of alerts produced through transaction monitoring which resulted in the escalation of an internal SAR. 1.9.1 401 Does the entity have Internal Reporting policies and procedures i.e. Identification and Reporting of Suspicious Activities and Transactions to the MLRO? Please answer Yes or No . 1.9.2 402 Does the entity s policies and procedures identify the MLRO and how to make a filing to them? Please answer Yes or No . 1.9.3 403 Does the entity have policies and procedures for reporting to the FRA? Please answer Yes or No . 1.9.4 404 How many internal Suspicious Activity/Transaction Reports have been reported to the MLRO for the Enter the number of internal Suspicious Activity/Transaction Reports reported to the MLRO Version: 1.3 AML Survey Completion Guide Banking Page 63 of 66 current reporting period? during the reporting period. 1.9.5 405 How many Suspicious Activity Reports have been reported, to the FRA, by the MLRO for the current reporting period? Enter the number of external Suspicious Activity Reports filed by the MLRO, to the FRA, during the reporting period. 1.9.6 406 How many hours on average does it take to file a SAR to the FRA? Enter the number of hours (average) the entity takes to file a Suspicious Activity/Transaction Report to the FRA. 1.9.7 407 Has the entity been requested by law enforcement agencies or the courts to provide any information relating to its customers, business activities, directors or senior management? Please answer Yes or No . 1.9.8 408 Has the entity been penalized or received a warning for non-compliance, from the FRA? Please answer Yes or No . 1.9.9 409 Does the entity maintain a log identifying all internal SARs filed to the MLRO along with their status? Please answer Yes or No . 1.9.10 410 Does the entity maintain a log identifying all SARs filed to the FRA along with their status? Please answer Yes or No . 1.9.11 411 If the MLRO decides not to file a SAR to the FRA is the reason for not filing documented? Please answer Yes or No . 1.10.1 412 Does the entity maintain Record Keeping Procedures? Please answer Yes or No . 1.10.2 413 How many years after the end of the business relationship are records retained? Enter the number of years 1.10.3 414 Are any records retained and accessible in the Cayman Islands? Please answer Yes or No . 1.10.4 415 How accessible and swiftly available are records for competent authorities - in hours? Enter the average time to comply in hours. 1.10.5 416 Does the entity maintain a declined business log? Please answer Yes or No . 1.10.6 417 Does the entity maintain records of its training programme? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Banking Page 64 of 66 1.11.1 418 If applicable, is there a board approved documented policy on outsourcing? Select which best applies: Yes , No or Not Applicable . This question is only applicable if the entity outsources any activities. 1.11.2 419 Was a risk assessment conducted on all outsourcing arrangements prior to initiation of the arrangement? Select which best applies: Yes , No or Not Applicable . 1.11.3 420 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. 1.11.4 421 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. 1.11.5 422 Does the outsourcing agreement clearly set out the obligations of both parties? Select which best applies: Yes, No or Not Applicable. This question is only applicable if the entity outsources any activities. 1.11.6 423 If relevant, does the outsourcing agreement require OSP to file a SAR with the FRA in cases of identified suspicious activity? Select which best applies: Yes, No or Not Applicable. This question is only applicable if the entity outsources any activities. 1.11.7 424 If relevant, is there a contingency plan in the event the Outsourcing service provider fails to perform the outsourced activity? Select which best applies: Yes, No or Not Applicable. This question is only applicable if the entity outsources any activities. 1.11.8 425 If relevant, does the regulated entity have timely access to all documents relevant to the outsourced activity maintained by the Outsourced service provider? Select which best applies: Yes, No or Not Applicable. This question is only applicable if the entity outsources any activities. 1.11.9 426 If relevant, does the outsourced AMLCO/MLRO have access to the entity's board? This question is only applicable if the entity outsources any activities. 1.11.10 427 If relevant, are there policies and procedures to ensure data protection restrictions would NOT delay access to data and documents? Select which best applies: Yes, No or Not Applicable. This question is only applicable if the entity outsources any activities. 1.11.11 428 Is sub-contracting of any of the outsourced activities permitted? Select which best applies: Yes, No or Not Applicable. This question is only applicable if the entity outsources any activities. 1.11.12 429 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. 1.12.1 430 Does the entity conduct correspondent-type business relationships, where the entity acts as the correspondent? Please answer Yes or No. 1.12.2 431 Does the entity's policies and procedures require the entity to obtain approval from senior management before establishing new correspondent relationships? Please answer Yes or No. 1.12.3 432 Does the entity have policies and procedures for assessing an institution's AML/CFT controls prior to establishing a correspondent banking relationship? Please answer Yes or No. 1.12.4 433 Does the entity's policies and procedures require the entity to conduct CDD on the institution prior to establishing correspondent banking relationships? Please answer Yes or No. 1.12.5 434 Does the entity have policies and procedures to ensure that it does not enter or continue a correspondent relationship with a shell bank? Please answer Yes or No. 1.13.1 435 Do you have any comments or feedback for this tab? Please answer Yes or No. Version: 1.3 AML Survey Completion Guide Banking Page 66 of 66 1.13.2 436 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.