



# Cayman Monetary Regulatory Authority International

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

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

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

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

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 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 ). This AML Survey Form is  
 issued in accordance with section 16(1)(b) of the Companies Management Act (2021  
 Revision). This Guide gives support to FSPs which carry out company management  
 services for accessing, completion and submission of the AML Survey Company Manager  
 Form. 2 FORM INFORMATION The AML Survey Company Manager Form is to be  
 completed by each FSP holding a Company Manager licence, who are commonly referred to  
 as Entity for purposes of this form. The AML Survey Company Manager 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 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: 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 . To access the AML Survey: Version: 1.5 AML Survey Completion Guide Company Manager Page 5 of 51

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. Version: 1.5 AML Survey Completion Guide Company Manager Page 6 of 51
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: 1.5 AML Survey Completion Guide Company Manager Page 6 of 51
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: 1.5 AML Survey Completion Guide Company Manager Page 7 of 51
5. The user should then click on the Return To Home button. Version: 1.5 AML Survey Completion Guide Company Manager Page 8 of 51
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: 1.5 AML Survey Completion Guide Company Manager Page 9 of 51
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: 1.5 AML Survey Completion Guide Company Manager Page 10 of 51

### 3.2 COMPLETING THE AML SURVEY FORM

1. Click the Current Questionnaire to access the AML Survey Form and start populating the form with the required data.
  - a. Completion guidance for the AML Survey is available at section 5 of this Guide below.
  - b. The recipient(s) can open, update, and close the AML Survey as many times as needed prior to the survey due date so long as the recipient selects Save .
  - c. Once the AML Survey has been completed it can either be Saved and Exported for internal review or Saved and Submitted to the Authority.
  - d. Upon submission, you will receive a confirmation from Cayman Islands Monetary Authority stating, Notification of Successful Submission . The Entity s name and the survey name will be listed for verification, useful for instances where users are submitting for more than one entity.
  - e. Once the AML Survey is Submitted an Excel and PDF copy of the completed survey will be available under Current Questionnaire .
  - f. Upon submission to the Authority a review of the AML Survey will be conducted by a member of the AMLD. If information is missing or needs clarification the Authority will Reject the AML Survey through an notification detailing the specifics. The recipient will then be required to make the necessary corrections or provide the additional detail to the Authority as indicated in the .
  - g. Partial or incomplete submissions will only be permitted by the Authority under approved circumstances. If an Entity submits an Incomplete AML Survey, they are required to submit a Request for Incomplete Submission

to the Authority. Incomplete Submission Requests are to be submitted to detailing the following: i. Licence or Registration Name ii. Licenced or Registration Number iii. Date of Licence or Registration iv. List of current directors v. Number of Clients vi. Reason for requesting to make an Incomplete Submission. 2. If a user receives or has access to more than one survey, they will not see the additional survey(s) in the Current Surveys section of the web page. At the top of the page, where it shows the Entity name, there should be a bold blue number indicating the number of Entity accounts the user has access to. Once the user clicks the number, a drop-down list will appear displaying the additional Entity names. 3. The STRIX portal allows you to copy two-column lists from an Excel document and paste the data directly into the survey. Given that there are several questions in the survey that require country breakdown details, the ability to bulk paste into STRIX will ease the burden of inputting individual responses. To upload bulk entries for those country breakdown questions, please do the following: Version: 1.5 AML Survey Completion Guide Company Manager Page 11 of 51 a. Open an Excel spreadsheet and using 2 columns enter the question responses (number or value) in the first column and the country details (ISO code or name) in the second column. b. Highlight and copy the information from the 2 columns in Excel, select the upload button next to the relevant question in STRIX and then paste the data into the pop-up window. c. Select Add to upload the desired data into the survey form, or Clear to remove the data. Note: Individual items may also be removed from the list by clicking on the delete button, next to the respective country, on the list. 4 OTHER USEFUL INFORMATION 4.1 USER ACCOUNT LOCKOUTS In the event the AML Survey recipient has exceeded the number of permitted failed login attempts, their account will be temporarily locked. An 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 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. 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. Version: 1.5 AML Survey Completion Guide Company Manager Page 12 of 51 Terms and Definitions: Terms/Abbreviations Definition/Meaning AMLRs Anti-Money Laundering Regulations, (2023 Revision), as amended. AMLCO Anti-Money Laundering Compliance Officer BO Beneficial Owner (or UBO) (as defined in Regulation 2 of the Anti-Money Laundering Regulations (as revised)) means the natural person who ultimately owns or controls the customer or on whose behalf a transaction or activity is being conducted and includes but is not restricted to (a) in the case of a legal person other than a company whose securities are listed on a

recognized stock exchange, a natural person who ultimately owns or controls, whether through direct or indirect ownership or control, 10% or more of the shares or voting rights in the legal person. (b) in the case of any legal person, a natural person who otherwise exercises ultimate effective control over the management of the legal person. (c) in the case of a legal arrangement, the trustee or other person who exercises ultimate effective control over the legal arrangement. Client / Customer A person who is in a business relationship, or is carrying out a one-off transaction, with a person who is carrying out relevant financial business in the Islands. This includes both Natural Persons and Legal Persons and Arrangement Clients. Corporate Entity A corporate body constituted under the Laws of the Islands, or any other jurisdiction, which is formed specifically to perform activities, such as running an enterprise or holding assets. Currency used for the Survey United States Dollars (US\$). All other currencies must be converted to US\$ unless otherwise stated. Version: 1.5 AML Survey Completion Guide Company Manager Page 13 of 51 Dealers in Precious Metals and Stones Legal and natural persons who produce precious metals or precious stones at mining operations, or intermediate buyers and brokers, or precious stone cutters and polishers, or precious metal refiners, or jewellery manufacturers who use precious metals and precious stones, or retail sellers to the public, or buyers and sellers in the secondary and scrap markets. DMLRO Deputy Money Laundering Reporting Officer Eligible Introducers A person that introduces applicants for business to a FSP whereby the FSP may place reliance on the introducer to verify the identity of the applicant for business, or beneficial owners, in accordance with Part IV of the AMLRs. The Eligible Introducer must satisfy the conditions set out in Regulation 25 of the ALMRs i.e., a person who falls within one of the categories under regulation 22(d) and who provides a written assurance pursuant to regulation 24(2)(b) that they verified the identity of an applicant for business, or beneficial owner, in accordance with Part IV of the AMLRs. Entity For the purposes of this form/survey, an entity is the holder of the Companies Management licence that is responding to this survey. F2F The engagement of a client directly, with the natural person physically present. The engagement will not be via , , online, etc. Fintech Service 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 (2022 Revision), except to the extent that it is modified by the Foundation company Act, 2017 or those foundation companies established in other jurisdictions. FRA Financial Reporting Authority. Gov / Pub Sector Business conducted in or with Government or Public Sector. Version: 1.5 AML Survey Completion Guide Company Manager Page 14 of 51 High Value Dealers Any business or sole trader that accepts or makes high value cash payments of US\$15,000 or more (or equivalent in any currency) in exchange for goods. HNWI A high net worth individuals (HNWI) is: (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 such as a company that buys goods internationally and ships them in for domestic purchases and/or exports goods and services produced in the home country for sale to other markets. Individual A Natural Person and not a Legal Person and Arrangement. Legal Arrangement A trust or partnership, or other entity created between parties which lacks separate legal personality. Legal Person A

company or other entity such as a foundation, created by operation of law with separate legal personality. MLRO Money Laundering Reporting Officer 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 Shareholder Someone who acts as a legal, unrelated, third party, who is officially registered as the holder of shares on behalf of the actual shareholder. Non-face-to-face Or Non-F2F, where a customer can open an account and transact with a regulated financial service provider (FSP) without being physically present for identification purposes, at the physical premises/office of the FSP. NPO A legal person or arrangement that primarily engages in raising or disbursing funds for purposes such as charitable religious, cultural, educational, social or fraternal purposes, or for the carrying out of other types of good works. OSP Outsourced Service Provider (OSP) is a third party, either an affiliated entity within a group or an entity that is external to 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. PEP Politically Exposed Person includes (a) a person who is or has been entrusted with prominent public functions by a foreign country, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executive of a state-owned corporation, and important political party official. (b) a person who is or has been entrusted domestically with prominent public functions, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executives of a state-owned corporation and important political party official; 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 January 1 through December 31, 2023, and future calendar years thereafter. Source of Funds The origin of the assets that will be used to form and maintain the business relationship. A client can have multiple sources of funds which should be established and recorded separately. However, multiple sources of funds that were used when forming the business relationship and monitoring the ongoing activity should be counted together. Take this into account when answering questions relating to the Nature of Business Source of Funding. Special Economic Zone Business Any type of business authorised to be carried on in a special economic zone pursuant to any legislation enforced in the Islands. Signatories Signatories are those persons authorised to act on behalf of a client, for example, BOs, Directors, or other Third Parties. Targeted Financial Sanctions (TSF) Includes 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 ).

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Includes those entities conducting Trusts, Company Manager, and Corporate Service Provider business. Transaction For the purposes of this survey, a transaction is the movement of assets, whether it be between the client and the entity, the client account and a third party, or the entity on behalf of the client. Fees paid from an external source, other than the client account held by the entity, should be reported as a transaction. Fees paid from client accounts, held by the entity, along with payments made to governments for taxes associated to securities trades should be excluded from the definition. Trust A legal arrangement which distinguishes between the legal and beneficial ownership of property. Legal ownership is transferred to a trustee who manages and administers the property for the benefit of the beneficiaries or for the furtherance of certain purposes. 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. Virtual Assets Products and Services Includes those services identified within the Virtual Asset (Service Providers) Act (2022 Revision), or as amended, as well as products which include any digital representation of value that can be digitally traded, transferred or used for payment. Timeframe Number of Clients Number of clients as at the end of the reporting period. Timeframe Number of Transactions Number of Transactions conducted for the client during the reporting period. AML Inherent Risk Questions: Ref. No. Question No. Question Description/Explanation Version: 1.5 AML Survey Completion Guide Company Manager Page 18 of 51 1.1.1 1 Total Clients / Customers. Enter the total number of clients the entity has at the end of the reporting period. Total clients consist of natural persons and legal persons and arrangements. 1.1.2 2 Total Transactions for the reporting period. Enter the total number of all transactions conducted for clients during the reporting period. 1.1.3 3 Clients / Customers that are Legal Persons, broken down by country of incorporation of the client. Enter the total number of clients that are legal persons subdivided by their country of incorporation as at the end of the reporting period. Examples include, but are not limited to, Limited Liability Companies, Non-Resident Companies, and Foundation companies. 1.1.4 4 Clients / Customers who are Legal Arrangements, broken down by the country of establishment of the client. Enter the total number of clients that are Legal Arrangements, broken down by the country of establishment of the client, as at the end of the reporting period. If an entity does not have such clients, a 0 value should be used. Example of legal arrangement include but are not limited to Trusts and Partnerships. 1.1.5 5 Total number of PEPs. Enter the total number of PEPs, by nationality of the PEP, as at the end of the reporting period. Total PEPs should include, but may not be limited to, those who are clients that are Natural Persons, BOs, Directors, or hold any other form of control, including signatories. 1.1.6 6 Total number of High Risk Clients. Enter the total number of clients / customers that are high risk, at the end of the reporting period. 1.1.7 7 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 8 Total number of BOs of clients who are Legal Persons or Arrangements. Enter the total number of BOs of all clients who are Legal Persons or Arrangements. This category is specific to all Legal persons and Arrangements. Examples include, but are not limited to, the total number of BOs of Corporate entities, Settlers of Trusts and General Partners of limited Partnerships. Version: 1.5 AML Survey Completion Guide Company Manager Page 19 of 51 A BO should not be counted more than once regardless of the number of business relationships they have with the entity. 1.2.2 9 Does the entity have any clients who are Legal Persons? Answer Yes or No 1.2.3 10 Number of BOs of clients who are Legal Persons. Enter the number of BOs of legal

person clients, broken down by the nationality of the BO. 1.2.4 11 Does the entity have any clients who are Legal Arrangements? Answer Yes or No 1.2.5 12 Number of settlors of clients who are Legal Arrangements. Enter the number of settlors of legal arrangement clients, broken down by the nationality of the settlor. This category is specific to clients who are legal arrangements and are Trusts. 1.2.6 13 Number of Partners of clients who are Legal Arrangements. Enter the number of partners of legal arrangement clients, broken down by the nationality of the partner. 1.2.7 14 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 Arrangements. Examples include, but not limited to, instances where a BO of a LLC, Partners of a Partnership or Settlor of a Trust is a HNWI. 1.2.8 15 Number of Clients that have BOs who are HNWIs. Enter the total number of clients that have BOs who are HNWIs. HNWIs is specific to those persons whose net worth is at least C1\$800,000 (approx. US\$1,000,000) and/or those that have assets valued at least C1\$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 1.2.9 16 Does the entity have any clients that have BOs who are Ultra HNWIs? Please answer Yes or No . UHNWIs is specific to those persons whose net worth is equal to or greater than US\$30,000,000. Version: 1.5 AML Survey Completion Guide Company Manager Page 20 of 51 1.2.10 17 Number of Clients that have BOs who are Ultra HNWIs. Enter the total number of clients who have BOs who are Ultra HNWIs. If the entity does not have any clients that fit this category record a 0 . 1.2.11 18 Does the entity have any clients who are Legal Persons or Arrangements that have BOs who are PEPs? Please answer Yes or No . 1.2.12 19 Number of BOs of clients who are Legal Persons or Arrangements which are also PEPs. Enter the total number of clients who are Legal Person and Arrangements that have BOs who are PEPs, as at the end of the reporting period. 1.2.13 20 Does the entity have any clients that have Nominees acting on behalf of a beneficial owner (inc. any Nominees within the ownership structure)? Please answer Yes or No . 1.2.14 21 Number of clients that have Nominees acting on behalf of a beneficial owner, or a Nominee within the ownership structure, broken down by nationality of the beneficial owner. Enter the total number of clients that have nominees acting on behalf of beneficial owners, or within its ownership structure, broken down by nationality of the beneficial owner. This category is specific to clients who are Legal Persons and Arrangements. 1.3.1 22 Number of total directors appointed to clients. Enter the total number directors appointed to clients, at the end of the reporting period. 1.3.2 23 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 nominee directors appointed, as at the end of the reporting period, broken down by country of nationality of the director and not the nominee director. 1.3.3 24 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 reporting period, broken down by country of nationality of the director (not the nominee). 1.3.4 25 Number of directors and/or senior management of clients who are PEPs. Enter the total number of clients who have directors and/or senior management who Version: 1.5 AML Survey Completion Guide Company Manager Page 21 of 51 are also PEPs, as at the end of the reporting period. 1.3.5 26 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 include senior



management who are Ultra HNWIs. 1.3.6 27 Number of directors and/or senior management of clients who are Ultra High Net Worth Individuals. Enter the number of directors and/or senior management of the clients who are also Ultra HNWIs, as at the end of the reporting period. 1.3.7 28 Number of directors and/or senior management of clients who are PEPs & HNWIs / Ultra-HNWIs. Enter the number of directors and/or senior management of the clients who are both PEPs and HNWIs / Ultra-HNWIs, as at the end of the reporting period. 1.4.1 29 Does the entity have any clients that are Gov / Pub Sector? Please answer Yes or No . 1.4.2 30 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. 1.4.4 31 Does the entity have any clients that are NPOs? Please answer Yes or No . 1.4.5 32 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 broken down by country of incorporation of the client. 1.4.7 33 Does the entity have any clients that are Foundations? Please answer Yes or No . 1.4.8 34 Foundations - Number of Clients. Enter the number of clients the entity has that are a Foundation, broken down by country of establishment of the client, at the end of the reporting period. 1.4.10 35 Does the entity have any clients that are Trusts? Please answer Yes or No . 1.4.11 36 Trusts - Number of Clients. Enter the number of clients the entity has, that are Trusts, broken down by country of establishment, as at the end of the reporting period. Version: 1.5 AML Survey Completion Guide Company Manager Page 22 of 51 1.4.14 37 Does the entity have any clients that are Segregated Portfolio Companies? Please answer Yes or No . 1.4.15 37 Segregated Portfolio Companies - Number of Clients. Enter the number of clients which are Segregated Portfolio Companies, as at the end of the reporting period. 1.4.17 39 Does the entity have any clients that operate from Special Economic Zone? Please answer Yes or No . 1.4.18 40 Special Economic Zone - Number of Clients. Enter the number of clients the entity has, that are registered / operate in a Special Economic Zone, as at the end of reporting period. 1.4.20 41 Does the entity have any clients that are Funds / Collective Investment Vehicles? Please answer Yes or No . 1.4.21 42 Funds / Collective Investment Vehicles - Number of Clients. Enter the number of clients the entity has, that are Funds / Collective Investment Vehicles as at the end of reporting period. 1.4.23 43 Does the entity have any clients that are Partnerships? Please answer Yes or No . 1.4.24 44 Partnerships Number of clients. Enter the number of clients the entity has that are Partnerships, as at the end of the reporting period. 1.5.1 45 Does the entity have any clients that are Natural Persons? Please answer Yes or No . This question does not apply to clients who are Legal Persons or Arrangements. 1.5.2 46 Clients / customers that are Natural Persons, broken down by nationality of the client. Enter the number of clients that are natural persons, broken down by their nationality, at the end of the reporting period. If an entity does not have such clients, a 0 value should be used. Note: This category does not include clients/ customers that are Legal Persons and Arrangements. 1.5.3 47 Clients/customers that are Natural Persons, broken down by Residency of the client. Enter the number of clients that are natural persons, broken down by their residency. Version: 1.5 AML Survey Completion Guide Company Manager Page 23 of 51 This category is specific to clients who are natural persons who have a direct business relationship with the entity. If an entity does not have such clients, a 0 value should be used. Note: This category does not include clients/ customers that are Legal Persons and Arrangements. 1.5.4 48 Natural Persons - Total Transactions for the reporting period. Enter

the total number of transactions conducted for clients who are Natural Persons during the reporting period. This category is specific to clients who are natural persons who have a direct business relationship with the entity. If an entity does not have such clients, a 0 value should be used. Note: This category does not include clients / customers that are Legal Persons and Arrangements.

1.5.5 49 Natural Person Clients - Does the entity have any clients that are PEPs? Please answer Yes or No . This question does not apply to clients who are Legal Persons or Arrangements.

1.5.6 50 Number of Natural Person clients who are PEPs. Enter the total number of Natural Person clients that are PEPs, as at the end of the reporting period. This question does not apply to clients who are Legal Persons or Arrangements.

1.5.7 51 Natural Persons - PEPs - Number of Transactions. Enter the number of transactions conducted by Natural Person clients that are PEPs, during the reporting period.

1.5.8 52 Does the entity have any Natural Person clients that are HNWLs? Please answer Yes or No . This question does not apply to clients who are Legal Persons or Arrangements. This category does NOT include those individuals who are Ultra HNWLs.

1.5.9 53 Number of Natural Person clients who are HNWLs. Enter the number of Natural Person clients the entity has that are HNWLs. This category does NOT include those individuals who are Ultra HNWLs.

1.5.10 54 Natural Person Clients - HNWLs - Number of Transactions. Enter the number of transactions conducted by Natural Person clients, who are HNWLs, during the reporting period.

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1.5.11 55 Does the entity have any Natural Person clients that are Ultra HNWLs? Please answer Yes or No . This question does not apply to clients who are Legal Persons or Arrangements.

1.5.12 56 Number of Natural Person clients who are Ultra HNWLs. Enter the number of Natural Person clients the entity has that are Ultra-HNWLs at the end of the reporting period.

1.5.13 57 Natural Person Clients - Ultra HNWLs- Number of Transactions. Enter the number of transactions conducted by Natural Person who are Ultra HNWLs, during the reporting period.

1.5.14 58 Does the entity have any Natural Person clients that are PEPs and HNWLs /Ultra HNWLs? Please answer Yes or No .

1.5.15 59 Number of Natural Person Clients who are PEPs and HNWLs / Ultra HNWLs. Enter the number of Natural Person clients the entity has that are both PEPs and HNWLs / Ultra HNWLs, at the end of the reporting period.

1.5.16 60 Natural Person Clients - PEPs and HNWLs / UHNWLs - Number of Transactions. Enter the number of transactions conducted on behalf of Natural Person clients, who are both PEPs and HNWLs/Ultra HNWLs, during the reporting period.

1.6.1 61 Nature of Business / Source of Funding: Enter the total number of clients whose source of funding falls within the list of sectors below.  
Banking Institutions Other Financial regulated Business\* Financial Leasing Money Lending Accountants Fintech \*excluding MSBs, Virtual Asset Products and Services, and TCSPs. Provide the total number of clients whose source of funding falls within the list of sectors.

1.6.2 62 Does the entity have any clients whose source of funding is from the Banking sector (excluding MSBs)? Please answer Yes or No .

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1.6.3 63 Banking Institutions (excluding MSBs) - Number of Clients. Enter the number of clients the entity has whose source of funding is from the banking sector.

1.6.4 64 Does the entity have any clients whose source of funding is from the financial services sector, other than banking, VASPs, MSBs and TCSPs? Please answer Yes or No .

1.6.5 65 Other Financial Regulated Business - Number of Clients. Enter the number of clients the entity has, whose source of funding is from the financial sector (excluding Banking, VASPs, MSBs and TCSPs).

1.6.6 66 Does the entity have any clients whose source of funding is from Financial Leasing

operations? Please answer Yes or No . 1.6.7 67 Financial Leasing- Number of Clients. Enter the number of clients the entity has, whose source of funding is from Financial Leasing operations. 1.6.8 68 Does the entity have any clients whose source of funding is from Money Lending operations? Please answer Yes or No . 1.6.9 69 Money Lending - Number of Clients. Enter the number of clients the entity has whose source of funding is from Money Lending operations. 1.6.10 70 Does the entity have any clients whose source of funding is through being an Accountant, (including any of: Audit, Assurance, Bookkeeping, Insolvency)? Please answer Yes or No . 1.6.11 71 Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Number of Clients. Enter the number of clients the entity has whose source of funding is through being an Accountant, (including any of: Audit, Assurance, Bookkeeping, and Insolvency). 1.6.12 72 Does the entity have any clients whose source of funding is from the Fintech industry? Please answer Yes or No . Version: 1.5 AML Survey Completion Guide Company Manager Page 26 of 51 1.6.13 73 Fintech - Number of Clients. Enter the number of clients the entity has whose source of funding is from the Fintech industry. 1.6.14 74 Nature of Business / Source of Funding: Enter the total number of clients whose source of funding falls within the list of sectors below. Legal Practitioners Dealers in Precious Metals and Stones Money Services Business (MSBs) Virtual Asset Products and Services High Value Dealers Import/Export Industry Shipping and Transport of Goods Provide the total number of clients whose source of funding falls within the list of sectors. 1.6.15 75 Does the entity have any clients whose source of funds is derived from being a Legal Practitioners? Please answer Yes or No 1.6.16 76 Legal Practitioners Number of clients. Enter the number of clients the entity has whose source of funding is derived from being a Legal Practitioner. 1.6.17 77 Does the entity have any clients whose source of funds is derived from Dealers in Precious Metals and Stones operations? Please answer Yes or No 1.6.18 78 Dealers in Precious Metals and Stones Number of Clients. Enter the number of clients the entity has whose source of funds is derived from Dealers in Precious Metals and Stones operations. 1.6.19 79 Does the entity have any clients whose source of funds are derived from Money Services Business operations? Please answer Yes or No . 1.6.20 80 Money Services Business - Number of Clients. Enter the number of clients whose source of funds are derived from Money Services Business operations. Version: 1.5 AML Survey Completion Guide Company Manager Page 27 of 51 1.6.21 81 Does the entity have any clients whose source of funds is derived from the virtual asset sector (products, services, investments)? Please answer Yes or No . 1.6.22 82 Virtual Asset Products and Services - Number of Clients. Enter the number of clients the entity has whose source of funds is derived from the virtual asset sector (products, services, or investments). 1.6.23 83 Does the entity have any clients whose source of funds is derived through High Value Dealer operations? Please answer Yes or No . 1.6.24 84 High Value Dealers - Number of Clients. Enter the number of clients whose source of funds is derived from High Value Dealer operations. 1.6.25 85 Does the entity have any clients whose source of funds is derived from TCSP operations? Please answer Yes or No . 1.6.26 86 TCSPs - Number of Clients. Enter the number of clients the entity has whose source of funds is derived from TCSP operations. 1.6.27 87 Does the entity have any clients whose source of funds is derived from the Import / Export Industry? Please answer Yes or No . 1.6.28 88 Import / Export - Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements operating in the Import / Export business, and natural persons that are employed the Import / Export industry. 1.6.29 89 Does the entity have any clients whose source of funding is derived from

the Shipping and Transport of Goods industry? Please answer Yes or No . 1.6.30 90 Shipping and Transport of Goods - Number of Clients. Enter the number of clients the entity has whose source of funding is derived from the Shipping and Transport of Goods industry. Version: 1.5 AML Survey Completion Guide Company Manager Page 28 of 51 1.6.31 91 Nature of Business / Source of Funding: Enter the total number of clients whose source of funding falls within the list of sectors below. Real Estate Agents/Brokers Gambling Business Adult Entertainment Industry Defence Industry Oil and Gas Industry Mining Construction / Development Retail / Restaurant Cannabis Industry Provide the total number of clients whose source of funding falls within the list of sectors. 1.6.32 92 Does the entity have any clients whose source of funds is derived through the Real Estate industry (Agents / Brokers / sellers)? Please answer Yes or No . 1.6.33 93 Real Estate Agents / Brokers - Number of Clients. Enter the number of clients the entity has whose source of funds is derived through the Real Estate industry (Agents / Brokers / sellers). 1.6.34 94 Does the entity have any clients whose source of funds is derived through the Gambling industry (including online gambling)? Please answer Yes or No . 1.6.35 95 Gambling business (including online gambling) - Number of Clients. Enter the number of clients the entity has whose source of funds is derived through the Gambling industry (including online gambling). 1.6.36 96 Does the entity have any clients whose source of funds is derived from the adult entertainment industry? Please answer Yes or No . 1.6.37 97 Adult Entertainment - Number of Clients. Enter the number of clients the entity has whose source of funds is derived from the Adult Entertainment Industry. Version: 1.5 AML Survey Completion Guide Company Manager Page 29 of 51 1.6.38 98 Does the entity have any clients whose source of funds are derived from the Defence Industry? Please answer Yes or No . 1.6.39 99 Defence Industry - Number of Clients. Enter the number of clients the entity has whose source of funds is derived from the Defence industry. 1.6.40 100 Does the entity have any clients whose source of funds are derived from operating in the Oil and Gas Industry? Please answer Yes or No . 1.6.41 101 Oil and Gas Industry - Number of Clients. Enter the number of clients the entity has whose source of funds is derived from operating in the Oil and Gas industry. 1.6.42 102 Does the entity have any clients whose source of funds is derived from the Mining Industry? Please answer Yes or No . 1.6.43 103 Mining Industry - Number of Clients. Enter the number of clients the entity has whose source of funds is derived from the Mining Industry. 1.6.44 104 Does the entity have any clients whose source of funds are derived through operating in the Construction / Development industry? Please answer Yes or No . 1.6.45 105 Construction / Development - Number of Clients. Enter the number of clients the entity has whose source of funds is derived from operating in the Construction / Development industry. 1.6.46 106 Does the entity have any clients whose source of funds are derived from operating in the Retail & Restaurant Business? Please answer Yes or No . 1.6.47 107 Retail & Restaurant Business - Number of Clients. Enter the number of clients the entity has whose source of funding is derived in the Retail & Restaurant Business. 1.6.48 108 Does the entity have any clients whose source of funds are derived through Please answer Yes or No . Version: 1.5 AML Survey Completion Guide Company Manager Page 30 of 51 Cannabis Production & Distribution operations? 1.6.49 109 Cannabis Production & Distribution - Number of Clients. Enter the number of clients whose source of funds is derived from Cannabis Production & Distribution operations. 1.6.50 110 Does the entity have any clients whose source of funds is Unknown to the entity? Please answer Yes or No . 1.6.51 111 Unknown Businesses and Professions - Number of Clients. Enter the number of clients the entity has whose

source of funds is Unknown to the entity. Unknown business and profession are where the entity does not know, and was not provided with, and was unable to verify the nature of business or profession (source of funds) of the client. 1.6.52 112 Does the entity have any clients where the nature of business / Source of Funding is not listed in a category above? Please answer Yes or No . 1.6.53 113 Other - Not mentioned above - Number of Clients. Enter the number of clients the entity has whose source of funds is known businesses however not mentioned above. 1.7.1 114 Does the entity have any comments or feedback for this tab? Please answer Yes or No . 1.7.2 115 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. 2.1.1 116 Number of clients the entity provides the service of Registered Office or Registered Agent. Enter the number of clients the entity provides the services of Registered Office or Registered Agent. 2.1.2 117 Number of Clients the entity provides the service of Formation Agent. Enter the number of clients the entity provides the service of Formation Agent. 2.1.3 118 Number of Clients the entity provides the service of Statutory Filings. Enter the number of clients the entity provides the service of Statutory Filings, as at the end of the reporting period. Version: 1.5 AML Survey Completion Guide Company Manager Page 31 of 51 2.1.4 119 Number of Clients the entity provides the service of BO Filings. Enter the number of clients the entity provides the service of BO Filings, as at the end of the reporting period. 2.1.5 120 Number of Clients the entity provides services of Nominee Shareholder, broken down by nationality of the shareholder who has the nominee appointed on their behalf. Enter the number of clients the entity provides the service of Nominee Shareholder, broken down by nationality of the shareholder who the entity acts as a Nominee on their behalf, as at the end of the reporting period. 2.1.6 121 Number of Clients the entity provides the services of Directorship. Enter the number of clients the entity provides the service of Directorship. 2.1.7 122 Number of Clients - Secretarial Services. Enter the number of clients the entity provides secretarial services. 2.1.8 123 Number of Clients the entity provides MLRO services. Enter the number of clients the entity provides MLRO. 2.1.9 124 Number of Clients the entity provides AML Compliance Officer services. Enter the number of clients the entity provides AML Compliance Officer services. 2.1.10 125 Does the entity provide other services to clients that are not listed above? Please answer Yes or No . 2.1.11 126 Number of Clients the entity provides Other Services not mentioned above. Enter the number of clients the entity provides Other Services that are not mentioned above. 2.1.12 127 Please describe the other types of services, that are not listed above, provided to clients. Enter all other types of services, that are not listed above, provided to clients. 2.2.1 128 Number of clients with assets that are marine vessels within their client structure, by the nationality of the BO. Enter the number of clients with assets that are marine vessels within their client structure, broken down by nationality of the BO. 2.2.2 129 Number of clients with assets that are marine vessels within the client structure, by jurisdiction of registration of the marine vessels. Enter the number of clients with assets that are marine vessels within their client structure, broken down by jurisdiction of registration of the marine vessels. Version: 1.5 AML Survey Completion Guide Company Manager Page 32 of 51 registration of the marine vessels. 2.2.3 130 Number of clients with assets that are aircraft within their client structure, by the nationality of the BO. Enter the number of clients with assets that are aircraft within their client structure, broken down by nationality of the BO. 2.2.4 131 Number of clients with assets that are aircraft within the client structure, by jurisdiction of registration of the aircraft. Enter the number of clients with assets that are aircraft within their client structure, broken

down by jurisdiction of registration of the aircraft. 2.2.5 132 Number of clients with assets that are real estate assets within their client structure, by the nationality of the BO. Enter the number of clients with real estate assets within their client structure, broken down by nationality of the BO. 2.2.6 133 Country location of the assets that are real estate. Enter the number of clients with real estate assets within their client structure, broken down by country location of the real estate. 2.2.7 134 Number of clients with Other Assets, that are not listed above, within their client structure, by the nationality of the BO. Enter the number of clients with Other Assets, not listed above, within their client structure, broken down by nationality of the BO. 2.2.8 135 Country location of the Other Assets. Enter the number of clients with Other Assets within their client structure, broken down by country location of the assets. 2.3.1 136 Does the entity facilitate payments to / from Clients in the form of Physical Cash? Please answer Yes or No. 2.3.2 137 Physical Cash - Number of Clients. Enter the number of clients where payments were made, to / from, in the form of Physical Cash, during the reporting period. 2.3.3 138 Physical Cash Value of Transactions Enter the value of the Physical Cash transactions conducted for or on behalf of clients, during the reporting period. Payments include those between the entity and the client and those conducted on behalf of the client. 2.3.4 139 Does the entity facilitate payments to / from Clients Please answer Yes or No. Version: 1.5 AML Survey Completion Guide Company Manager Page 33 of 51 in the form of Virtual Currency? 2.3.5 140 Virtual Currency Number of Clients. Enter the number of clients where payments were made, to / from, in the form of Virtual Currency, during the reporting period. 2.3.6 141 Virtual Currency - Value of Transactions. Enter the value of the Virtual Currency transactions conducted for or on behalf of clients during the reporting period. 2.3.7 142 Does the entity facilitate payments to / from Clients via Third Parties? Please answer Yes or No. 2.3.8 143 Third Parties - Number of Clients. Enter the number of clients where payments to / from the client were conducted via Third Parties, during the reporting period. Payments via third party means that the payment was paid to / from a third party not associated with the direct business relationship or transaction. 2.3.9 144 Third Parties - Value of Transactions. Enter the value of transactions where payments to / from the client were conducted via Third Parties, during the reporting period. 2.3.10 145 Does the entity facilitate payments to / from Clients via Credit Card? Please answer Yes or No. 2.3.11 146 Credit Card Payments - Number of Clients Enter the number of clients where payments to / from clients were conducted via Credit Card, during the reporting period. 2.3.12 147 Credit Card Payments - Value of Transactions. Enter the value of Credit Card payments processed for clients during the reporting period. 2.3.13 148 Does the entity facilitate payments to / from Clients in the form of Wire Transfers? Please answer Yes or No. 2.3.14 149 Wire Transfers - Number of Clients. Enter the number of clients where wire payments were made to / from clients, during the reporting period. Version: 1.5 AML Survey Completion Guide Company Manager Page 34 of 51 2.3.15 150 Wire Transfers - Value of Funds Transferred. Enter the value of Wire Transfers transactions conducted to / from clients during the reporting period. 2.3.16 151 Does the entity facilitate payments to / from Clients in the form of Transfer of Securities? Please answer Yes or No. 2.3.17 152 Transfer of Securities - Number of Clients. Enter the number of clients where payments were made to / from clients, during the reporting period. 2.3.18 153 Transfer of Securities - Value of Funds Transferred. Enter the value of all transactions relating to Transfer of Securities conducted to / from clients, during the reporting period. 2.3.19 154 Does the entity facilitate payments to / from Clients in other forms not listed above? Please answer Yes or No. 2.3.20 155 Other Forms of Payment -

Number of Clients. Enter the number of clients where Other Forms of Payments, not listed above, were conducted to / from clients, during the reporting period. 2.3.21 156 Other Forms of Payment - Value of Funds Transferred. Enter the value of funds that were transferred to / from clients using Other Forms of Payments, during the reporting period. 2.3.22 157 Please indicate the types of Other Forms of Payments. List the Other Forms of Payment processed to / from clients, during the reporting period, which are not listed above. 2.4.1 158 Total value of funds received, broken down by originating country of payment. Enter the total value of funds received by clients, or on behalf of clients, during the reporting period, broken down by the country where the funds originated. 2.4.2 159 Total number of transactions received, broken down by origin of the funds. Enter the total number of transactions, received during the reporting period, broken down by country of origin of the funds. 2.4.3 160 Total value of funds transferred out, broken down by the country of payment destination. Enter the total value of funds transferred out of the jurisdiction by clients during the reporting period, broken down by the country of payment destination. 2.4.4 161 Total number of transactions transferred out, broken down by Enter the total number of outgoing transactions during the reporting period. Version: 1.5 AML Survey Completion Guide Company Manager Page 35 of 51 destination country of the transaction. relating, broken down by destination country of the transaction. 2.5.1 162 Does the entity have any comments or feedback for this tab? Please answer Yes or No . 2.5.2 163 Please use this area to provide any comments or feedback for this tab. Provide comments or feedback. Please include N/A if no comment. 3.1.1 164 Number of Clients - F2F. Provide the total number of clients, in the entity's entire current portfolio, that were onboarded via F2F methods, and not only those onboarded during the reporting period. F2F channels include: F2F, Referrals within Group F2F, Eligible Introducers F2F, and Other Introducers-F2F. 3.1.2 165 Number of Clients - Non- F2F. Provide the total number of clients, in the entity's entire portfolio, that were onboarded via Non-F2F methods, and not only those onboarded during the reporting period. Examples of Non-F2F include instances where the entity is onboarding clients through , or online platform; however, they do not have F2F contact with the clients. 3.1.3 166 Total number of clients via Online Platforms. Provide the total number of clients, in the entity's entire portfolio, that were onboarded via Online platforms, and not only those onboarded during the reporting period. 3.1.4 167 Number of Clients through Referrals within Group - F2F. Enter the number of clients which were onboarded using referrals within Group - F2F for clients onboarded during the reporting period, broken down by the BOs' nationality. An example of Group F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself have F2F interaction with the clients. Version: 1.5 AML Survey Completion Guide Company Manager Page 36 of 51 3.1.5 168 Number of Clients through Referrals within Group - Non F2F. Enter the number of clients which were onboarded using referrals within Group and via Non Face to Face Channels for the reporting period, broken down by nationality of the BOs. 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. 3.1.6 169 Total number of Clients onboarded through Eligible Introducers. Total clients in the entity's entire portfolio that were onboarded using Eligible Introducers where the entity continues to rely on the Eligible Introducer for verification of the clients' identity. An Eligible Introducer is a person who falls within one of the 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. 3.1.7 170 Number of Clients through Eligible Introducers. Enter the number of clients which were onboarded through Eligible Introducers, during the reporting period, broken down by the nationality of the BO. 3.1.8 171 Number of Clients through Other Introducers - Non- F2F. Enter the number of clients, that were onboarded through Other Introducers Non - F2F, for the reporting period, broken down by nationality of the BOs. 3.1.9 172 Number of Clients via Online Platforms. Enter the number of clients onboarded using online platforms during the reporting period, broken down by nationality of the BO. 3.2.1 173 Has the entity outsourced the role of AML Compliance Officer within the reporting period? Please answer Yes or No . 3.2.2 174 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 Version: 1.5 AML Survey Completion Guide Company Manager Page 37 of 51 turnover includes one of each within the reporting period. 3.2.3 175 What was the country of residency of the AML Compliance Officer at the end of the reporting period? Enter the country of residency of the AML Compliance Officer as at the end of the reporting period. 3.2.4 176 How many AML Compliance Officers has the entity had within the past 3 years? If no turnover of the Compliance Officer role in the three-year period, answer "1". 3.2.5 177 Has the entity outsourced the role of Money Laundering Reporting Officer within the reporting period? Please answer Yes or No . 3.2.6 178 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. 3.2.7 179 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. 3.2.8 180 How many Money Laundering Reporting Officers did the entity have in the past 3 years? If no turnover within the Money Laundering Reporting Officers role in the three-year period, answer "1". 3.2.9 181 Has the entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period? Please answer Yes or No . 3.2.10 182 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: Version: 1.5 AML Survey Completion Guide Company Manager Page 38 of 51 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. 3.2.11 183 What was the country of residency of the Deputy Money Laundering Reporting Officer at the end of the reporting period? Enter the country of residency of the Deputy Money Laundering Reporting Officer at the end of the reporting period. 3.2.12 184 How many Deputy Money Laundering Reporting Officers have you had in the past 3 years? If no turnover of the Deputy Money Laundering Reporting Officers role in the three-year period, answer "1". 3.2.13 185 Has the entity outsourced the function of Targeted Financial Sanction screening within the reporting period? Please answer Yes or No . 3.2.14 186 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. 3.2.15 187 What was the outsourcing country of the Targeted Financial Sanction screening function at the end of the reporting period? Enter country the entity outsourced the Targeted Financial Sanction screening function to, as at the end of the reporting period. 3.2.16 188 How many TFS Screening platforms / software did the entity have in the past 3 years? If no turnover of the Targeted Financial Sanction screening function in the three- year period, answer "1". 3.2.17 189 Has the entity outsourced the function of transaction Please answer Yes or No . Version: 1.5 AML Survey Completion Guide Company Manager Page 39 of 51 or client monitoring within the reporting period? 3.2.18 190 To whom has the transaction monitoring function been outsourced? If outsourced, select the status that best describes the outsource relationship of the transaction monitoring function: Member within Group 3rd Party and Member within Group 3rd Party Select 3rd Party and Member within Group", in cases where the Transaction Monitoring services turnover includes one of each within the reporting period. 3.2.19 191 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. 3.2.20 192 How many Transaction monitoring platforms / software did the entity have in the past 3 years? If no turnover of the Transaction Monitoring platform in the three-year period, answer "1". 3.3.1 193 Where is the entity s physical place of business? Select the country where the entity operates. 3.3.2 194 Number of branches, broken down by country of operation. Enter the number of branches the entity has, broken down by country of operation. 3.3.3 195 Number of Subsidiaries, broken down by country of operation. Enter the number of subsidiaries the entity has, broken down by country of operation. 3.3.4 196 In which country is the parent or holding company incorporated? Enter the country in which the parent or holding company was incorporated. 3.3.5 197 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. 3.3.6 198 How many Beneficial Owners does the entity have, by country of nationality of the Beneficial Owner, at the end of the reporting period? Enter the number of beneficial Owners the entity has, broken down by nationality of the beneficial owner, at the end of the reporting period. Version: 1.5 AML Survey Completion Guide Company Manager Page 40 of 51 AML Controls Questions: No. Question No. Question Description/Explanation 1.1.1 202 Does the Governing Body receive comprehensive reports, information and statistics regarding ML/TF/PF risks and issues? Please answer Yes or No . 1.1.2 203 Does the Governing Body review all AML/CFT/CPF related policies and procedures periodically? Please answer Yes or No . 1.1.3 204 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. 1.1.4 205 Is there an audit risk and compliance subcommittee? Please answer Yes or No . 1.1.5 206 Is there an approved Charter for the Governing Body and Sub-Committees? Please answer Yes or No . 1.1.6 207 Is the entity subject to group wide governance practices? Please answer Yes or No . 1.1.7 208 Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body? Please answer Yes or No . 1.1.8 209 Is AML/CFT/CPF, including regulatory audit findings, a standard agenda item Please answer Yes or No .

3.3.7 199 How many directors does the entity have appointed, by country of nationality of the directors, at the end of the reporting period? Enter the number of directors appointed to the entity at the end of the reporting period, broken down by the nationality of the directors.

3.4.1 200 Does the entity have any comments or feedback for this tab? Please answer Yes or No .

3.4.2 201 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: 1.5 AML Survey Completion Guide Company Manager Page 41 of 51

at Board/Principal and/or Board committee meetings? 1.1.9 210 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 .

1.1.10 211 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 .

1.1.11 212 Provide the country of jurisdiction. Enter the names of the jurisdiction(s) in which the entity, or its directors, shareholders, beneficial owners or senior officers were denied an application by any regulatory body.

1.1.12 213 Are any of the entity's AML Officers, Shareholders, Beneficial Owners, Directors, or Senior Management PEPs? Please answer Yes or No .

1.1.13 214 Does the Board ensure that the AMLCO/MLRO receive the appropriate training? Please answer Yes or No .

1.2.1 215 Has an AML Compliance Officer been appointed? Please answer Yes or No .

1.2.2 216 Has an MLRO been appointed? Please answer Yes or No .

1.2.3 217 Is a Deputy MLRO appointed? Please answer Yes or No .

1.2.4 218 Is the AMLCO employed at a managerial level of the company? Please answer Yes or No .

1.2.5 219 For reporting lines, does the AMLCO report to the Governing Body? Please answer Yes or No .

1.2.6 220 Does the AMLCO maintain independence from revenues related / client facing activities? Please answer Yes or No .

1.2.7 221 Does the AMLCO have sufficient compliance/AML skills and experience to perform their function? Please answer Yes or No .

1.2.8 222 Does the AMLCO report to the Board on AML/CFT/CPF related issues and on the Please answer Yes or No . Version: 1.5 AML Survey Completion Guide Company Manager Page 42 of 51

adequacy of the AML/CFT/CPF framework? 1.2.9 223 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 .

1.2.10 224 Does the AMLCO provide oversight of the AML/CFT/CPF and Sanctions risk assessment framework and procedures? Please answer Yes or No .

1.2.11 225 Does the MLRO maintain independence from revenues related / client facing activities? Please answer Yes or No .

1.2.12 226 Does the MLRO report to the Board on AML/CFT/CPF related issues and on the adequacy of the AML/CFT/CPF framework? Please answer Yes or No .

1.3.1 227 Has the entity developed and implemented AML/CFT/CPF and Sanctions training and awareness programme? Please answer Yes or No .

1.3.2 228 Have the directors received AML/CFT/CPF and Sanctions training during the reporting period? Please answer Yes or No .

1.3.3 229 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 .

1.3.4 230 Has the MLRO received specialized compliance/AML/CFT/CPF training over the last year relevant to the current position? Please answer Yes or No .

1.3.5 231 Has the DMLRO received specialized compliance/AML/CFT/CPF training over the last year relevant to the current position? Please answer Yes or No .

1.3.6 232 Does the AMLCO ensure that ongoing training programs are kept up to date and relevant? Please answer Yes or No .

1.3.7 233 Are changes to policy

and procedures communicated to all staff/directors and senior management? Please answer Yes or No . Version: 1.5 AML Survey Completion Guide Company Manager Page 43 of 51

1.3.8 234 Does the entity assess AML/CFT/CPF and Sanctions knowledge of its employees? Please answer Yes or No .

1.3.9 235 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.

1.3.10 236 Does the AMLCO organize or ensure AML/CFT/CPF and Sanctions training is conducted for all staff annually? Please answer Yes or No .

1.4.1 237 Does the entity have an internal audit department / unit / function with oversight over AML functions? Please answer Yes or No .

1.4.2 238 Is there a developed Internal Audit plan, with focus on AML/CFT/CPF and Sanctions, reviewed by the Board? Please answer Yes or No .

1.4.3 239 Is the Internal Audit plan approved by the Board? Please answer Yes or No .

1.4.4 240 Does the internal AML audit include reviews of the AML/CFT/CPF related policies, procedures and processes? Please answer Yes or No .

1.4.5 241 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 .

1.4.6 242 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.

1.4.7 243 Does the Board review the AML audit program? Please answer Yes or No .

1.4.8 244 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.

1.4.9 245 Where applicable, does the internal audit include testing on functions which are outsourced? Please select Yes , No , or Not Applicable .

1.4.10 246 Where applicable, does the internal audit include testing of EI relationships? Please enter Yes, No, or Not Applicable. Version: 1.5 AML Survey Completion Guide Company Manager Page 44 of 51

1.4.11 247 Does the Internal Audit include testing for the AML/CFT/CPF and Sanctions training function? Please answer Yes or No .

1.4.12 248 Does the Internal Audit include testing for the entity's TFS and PF controls? Please answer Yes or No .

1.5.1 249 Does the entity conduct a business risk assessment which considers ML/TF/PF and Sanctions risk factors? Please answer Yes or No .

1.5.2 250 Does the entity employ a Risk Based Methodology when assessing and allocating oversight of its clients? Please answer Yes or No .

1.5.3 251 Does the entity consider the ML/TF/PF risks of the clients, (including BOs, in their risk assessment? Please answer Yes or No .

1.5.4 252 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 .

1.5.5 253 Does the entity consider the ML/TF/PF products and services (existing and new) in their risk assessment? Please answer Yes or No .

1.5.6 254 Does the entity consider the ML/TF/PF delivery channels (existing and new) in their risk assessment? Please answer Yes or No .

1.5.7 255 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 .

1.5.8 256 Does the entity consider the ML/TF/PF technology (existing and new) in their risk assessment? Please answer Yes or No .

1.5.9 257 Does the entity consider Sanctions risk factors in their risk assessment? Please answer Yes or No .

1.5.10 258 Does the entity consider PF risk factors in their risk assessment? Please answer Yes or No .

1.5.11 259 Does the entity consider outsourcing risk factors in its risk assessment? Please answer Yes

or No . 1.5.12 260 Does the entity take their nature, size and complexity into consideration and Please answer Yes or No . Version: 1.5 AML Survey Completion Guide Company Manager Page 45 of 51 consider the need for other risk factors, other than those listed above, when developing their business risk assessment? 1.5.13 261 How often, in months, do you review High-Risk relationships/accounts? Please respond using the following: Never, More than 18 months, 7 12 months, 1 6 months. 1.5.14 262 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. 1.5.15 263 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. 1.6.1 264 Does the entity rely on Group AML/CFT policies and procedures? Please answer Yes or No . 1.6.2 265 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 . 1.6.3 266 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 . 1.6.4 267 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 . 1.6.5 268 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 . 1.6.6 269 Does the entity have Board, or governing body, approved policies and procedures for establishing Source of Funds? Please answer Yes or No . Version: 1.5 AML Survey Completion Guide Company Manager Page 46 of 51 1.6.7 270 Does the entity have Board, or governing body, approved policies and procedures for employee screening? Please answer Yes or No . 1.6.8 271 Does the entity have Board or governing body approve policies and procedures for training of staff? Please answer Yes or No . 1.6.9 272 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 . 1.6.10 273 Does the entity have policies and procedures on collecting due diligence on counterparties and business associates? Please answer Yes or No . 1.6.11 274 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 . 1.6.12 275 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. Enter the total number client accounts that were declined, terminated, or restricted due to AML/CFT/CPF and Sanctions concerns. 1.7.1 276 Does the entity have a screening process? Please answer Yes or No . 1.7.2 277 Is the screening process manual, automated or a combination? Select which best applies: Manual, Automated, or Automated with Manual Checks. 1.7.3 278 Is the screening process fully or partially outsourced? Please select Fully or Partially . 1.7.4 279 When designated lists are updated, does the screening process reflect these updates within 24 hours? Please answer Yes or No . 1.7.5 280 Is sanctions monitoring done in real time or after the event? Select what applies: No process , After the event , or Real time . 1.7.6 281 Is the customer and counterparty database screened against the designated H.M. Treasury list? Please answer Yes or No . Version: 1.5 AML Survey Completion Guide Company Manager Page 47 of 51 1.7.7 282 Are procedures in place to ensure customers / counterparties are screened prior to payouts (remittance of funds)? Please answer Yes or No . 1.7.8 283 Does the entity have Asset

Freeze procedures? Please answer Yes or No . 1.7.9 284 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 . 1.7.10 285 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 . 1.7.11 286 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 . 1.7.12 287 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 . 1.7.13 288 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 . 1.8.1 289 Does the entity have transaction monitoring policies and procedures developed commensurate to its operations? Please answer Yes or No . 1.8.2 290 Does the entity have policies and procedures for restricting or flagging transactions (including international wire transfers, manager s drafts, and trade finance transactions) with countries where there are sanctions imposed or those that have been identified as having TF/PF deficiencies? Please answer Yes or No . 1.8.3 291 Does the entity have in place an automated system for monitoring transactions for potential suspicion and reporting suspicious transactions? Please answer Yes or No . 1.8.4 292 Is there a requirement for senior management approval before establishing high risk business relationships i.e. with PEPs? Please answer Yes or No . 1.8.5 293 Does the entity have EDD procedures? Please answer Yes or No . 1.8.6 294 Does the entity apply EDD on customers and counterparties based in higher-risk countries? Please answer Yes or No . 1.8.7 295 Where high risk clients are identified, did the entity conduct EDD measures for every transaction such customers carry out? Please answer Yes or No . 1.8.8 296 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. 1.9.1 297 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 . 1.9.2 298 Does the entity s policies and procedures identify the MLRO and how to make a filing to them? Please answer Yes or No . 1.9.3 299 Does the entity have policies and procedures for reporting to the FRA? Please answer Yes or No . 1.9.4 300 How many internal Suspicious Activity/Transaction Reports have been reported to the MLRO for the current reporting period? Enter the number of internal Suspicious Activity/Transaction Reports reported to the MLRO during the reporting period. 1.9.5 301 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. 1.9.6 302 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. 1.9.7 303 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 . 1.9.8 304 Has the entity been penalized or received a warning for non-compliance, from the FRA? Please answer Yes or No . 1.9.9 305 Does the entity maintain a log identifying all internal SARs filed to the MLRO along with their status? Please answer Yes or No . 1.9.10 306 Does the entity maintain a log identifying all SARs filed to the FRA along with their status? Please answer Yes or No . 1.9.11 307 If the MLRO decides not to file a SAR to the FRA is the reason for not filing documented? Please answer Yes or No . 1.10.1 308 Does the entity maintain Record Keeping Procedures? Please answer Yes or No . 1.10.2 309 How many years after the end of the business relationship are records retained? Enter the number of years 1.10.3 310 Are any records retained and accessible in the Cayman Islands? Please answer Yes or No . 1.10.4 311 How accessible and swiftly available are records for competent authorities - in hours? Enter the average time to comply in hours. 1.10.5 312 Does the entity maintain a declined business log? Please answer Yes or No . 1.10.6 313 Does the entity maintain records of its training programme? Please answer Yes or No . 1.11.1 314 If applicable, is there a board approved documented policy on outsourcing? Select which best applies: Yes , No or Not Applicable . Version: 1.5 AML Survey Completion Guide Company Manager Page 50 of 51 This question is only applicable if the entity outsources any activities. 1.11.2 315 Was a risk assessment conducted on all outsourcing arrangements prior to initiation of the arrangement? Select which best applies: Yes , No or Not Applicable . 1.11.3 316 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. 1.11.4 317 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. 1.11.5 318 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. 1.11.6 319 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. 1.11.7 320 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. 1.11.8 321 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. 1.11.9 322 If relevant, does the outsourced AMLCO/MLRO have access to the entity s board? Select which best applies: Yes , No or Not Applicable . This question is only applicable if the entity outsources any activities. Version: 1.5 AML Survey Completion Guide Company Manager Page 51 of 51 1.11.10 323 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. 1.11.11 324 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. 1.11.12 325 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. 1.12.1 326 Do you have any comments or feedback for this tab? Please answer Yes or No . 1.12.2 327 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.