



# 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: 1.4 AML Survey Completion Guide: Trusts Page 2 of 62 Revision History: Effective Date Version Number Revision Description 19 September 2022 1.0 Initial release of document. 3 October 2022 1.1 Update definitions. 21 October 2022 1.2 Updates to definitions, descriptions, and explanations. 31 May 2023 1.3 Updates to definitions, descriptions, explanations, and questions. 31 May 2024 1.4 Updates to definitions, descriptions, explanations, and questions. Version: 1.4 AML Survey Completion Guide: Trusts Page 3 of 62 Contents 1 Introduction

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following entity contacts to distribute the AML Survey: AMLCO, MLROs, DMLROs and 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: 1.4 AML Survey Completion Guide: Trusts Page 5 of 62

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: 1.4 AML Survey Completion Guide: Trusts Page 6 of 62
3. The recipient will be asked to re-enter their password.
4. Once the recipient's password has been re-entered, and matches, they can submit and finish the activation process. An Notification of Successful Activation will be sent providing a Go to Portal link which can be used for all future access.

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5. The user should then click on the Return To Home button. Version: 1.4 AML Survey Completion Guide: Trusts Page 8 of 62
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

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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: 1.4 AML Survey Completion Guide: Trusts Page 10 of 62

### 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. 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: 1.4 AML Survey Completion Guide: Trusts Page 11 of 62

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. Version: 1.4 AML Survey Completion Guide: Trusts Page 12 of 62 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.

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 carrying out a one-off transaction with a person who is conducting relevant financial business in the Islands. Generally, for an entity that has a Trust Licence, a client is a (1) Trust Structure, which is a Legal Arrangement, or (2) Settlor which is a Natural Person, or who has engaged with the entity to form a Trust Structure. However, it is possible for an entity to have other customer types (Individual or Legal Persons and Arrangements) depending on their business plan. Where an entity's clients are a trust structure, or other legal arrangement, with one or more Version: 1.4 AML Survey Completion Guide: Trusts Page 13 of 62 registered companies (Legal Persons) or Legan Arrangements within the structure it should be counted as one (1) client. Corporate Entity A body corporate constituted under the Laws of the Islands or any other jurisdiction, which is formed specifically to perform activities, such as running an enterprise or holding assets. Currency used for the Survey United States Dollars (US\$). All other currencies must be converted to US\$ unless otherwise stated. Dealers in Precious Metals and Stones Legal and natural persons who produce precious metals or precious stones at mining operations, or intermediate buyers and brokers, or precious stone cutters and polishers, or precious metal refiners, or jewellery manufacturers who use precious metals and precious stones, or retail sellers to the public, or 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 Trust licence that is responding to this survey. F2F The face-to-face introduction / onboarding with 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 (Revised), except to the extent that it is Version: 1.4 AML Survey Completion Guide: Trusts Page 14 of 62 modified by the Foundation company Act, 2017 or those foundation companies established in other jurisdictions. FRA Financial Reporting Authority. Gov / Pub Sector Business conducted in or with Government or Public Sector. High Value Dealers Any business or sole trader that accepts or makes high value cash payments of US\$15,000 or more (or equivalent in any currency) in exchange for goods. HNWI A high net worth 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 HNWIs 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 is 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 and Arrangements client. Legal

Arrangement A trust or partnership, foundation or other entity created between parties which lacks separate legal personality. Legal Person A company or other entity 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 Director A natural person or legal person who takes on the role of company director on the behalf of another. Nominee Shareholder A nominee shareholder is someone who acts as a legal, unrelated, third party, who is officially registered as the holder of shares on behalf of the actual shareholder. Non-face-to-face Or Non-F2F , where a customer can open an account and transact with a regulated financial service provider (FSP) without being physically present for identification purposes, at the physical premises/office of the FSP. NPO A Non-Profit Organisation is a legal person or arrangement that primarily engages in raising or disbursing funds for purposes such as charitable, religious, cultural, educational, social or fraternal purposes, or for the carrying out of other types of good works . OSP Outsourced Service Provider (OSP) is a third party, either an affiliated entity within a group or an entity that is external to entity, that provides functions or activities on a continuing basis to a FSP, that would normally be undertaken by the regulated entity, now or in the future. Outsourcing does not include purchasing contracts. PEP Politically Exposed Person includes (a) a person who is or has been entrusted with prominent public functions by a foreign country, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executive of a state-owned corporation, and important political party official. (b) a person who is or has been entrusted domestically with prominent public functions, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executives of a state-owned corporation and important political party official; 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. Signatories Signatories are those persons authorised to act on behalf of a client, for example, BOs, Directors, or other Third Parties. 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) . Special Economic Zone Business Any type of business authorised to be carried on in a special economic zone pursuant to any Law in force in the Islands. Targeted Financial Sanctions (TFS) 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 ). TCSP 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 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's Ultra-High Net Worth Individuals, also referred to as UHNWIs, are all HNWI's whose net worth is greater than or equal to US\$30,000,000. Value of Client Assets The total market value of assets or investments maintained / held for or on behalf of clients. The total amount can represent one client's assets under management / administration (AUM) or the entire asset portfolio. Virtual Assets Products and Services Includes those services identified within the Virtual Asset (Service Providers) Act (2022 Revision), or as amended, as well as products which include any digital representation of value that can be digitally traded, transferred or used for payment. Timeframe Assets Under Management Value of AUM as at the end of the reporting period. Timeframe Number of Clients Number of clients as at the end of the reporting period. Timeframe Number of Transactions Number of Transactions conducted during the reporting period. AML Inherent Risk Questions: Ref. No. Question No. Question Description/Explanation 1.1.1 1 Total Clients / Customers. Enter the total number of clients the entity has at the end of the reporting period. Version: 1.4 AML Survey Completion Guide: Trusts Page 18 of 62 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. Where applicable, the total transactions should only include those of the Cayman Islands legal entity. 1.1.3 3 Total Value of Client Assets Under Management, by geographic location of the assets, at the end of the reporting period. Enter the total value of client assets for clients reported in Question 1, by geographic location of the assets, at the end of the reporting period. If an entity does not manage assets for its clients, a 0 value should be used. 1.1.4 4 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 broken down by country of incorporation as at the end of the reporting period. If an entity does not have such clients, a 0 value should be used. 1.1.5 5 Value of Client Assets Under Management - Legal Persons. Enter the value of assets under management for clients who are Legal Persons, at the end of the reporting period. If the entity does not have any clients that fit this category record a 0 . 1.1.6 6 Clients / Customers that are Legal Arrangements, broken down by country of establishment of the client. Enter the total number of clients that are legal arrangements, broken down by country of establishment of the client, at the end of the reporting period. Examples of legal arrangements include but are not limited to Partnerships and Trusts. If an entity does not manage assets for these clients, a 0 value should be used. 1.1.7 7 Value of Client Assets Under Management - Legal Arrangements. Enter the value of assets under management for clients who are Legal Arrangements, at the end of the reporting period. If the entity does

not have any clients that fit this category record a 0 . Version: 1.4 AML Survey Completion Guide: Trusts Page 19 of 62

1.1.8 8 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.

1.1.9 9 Total Number of High Risk Clients. Enter the total number of clients/customers that are high risk, at the end of the reporting period.

1.1.10 10 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 11 Total number of BOs of clients who are Legal Persons and Arrangements. Enter the total number of BOs of all clients who are legal persons or arrangements at the end of the reporting period. This category is specific to legal persons and arrangements. Examples include, but are not limited to, the total number of BOs 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 12 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.

1.2.3 13 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.

1.2.4 14 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.

1.2.5 15 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 which have Nominees acting on behalf of beneficial owner, or within its ownership structure, categorised by nationality of the beneficial owner. This category is specific to clients who are Legal Persons and Arrangements. Examples include, but are not limited to, instances where a BO of a Corporate entity or the Settlor of a Trust has a Nominee appointed. If the entity does not have any clients that fit this category record a 0 .

1.2.6 16 Number of BOs of clients who are PEPs. Enter the total number of BOs of clients who are PEPs as at the end of the reporting period. This category is specific to clients who are Legal Persons and Arrangements. Examples include, but are not limited to, instances where a BO of a Corporate entity or the Settlor of a Trust is a PEP. If the entity does not have any clients that fit this category record a 0 .

1.2.7 17 Number of clients that have BOs who are HNWI. Enter the total number of clients which have BOs, who are also HNWI. HNWI 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 who are Ultra HNWI, individuals 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 .

1.2.8 18 Number of Clients that have BOs who are Ultra HNWI. Enter the total number of clients who have BOs who are also Ultra HNWI. UHNWI 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 .

1.3.1 19 Number of total directors appointed to clients. Enter the total number of directors appointed to clients, as at the end of the reporting period.

1.3.2 20 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. If the entity does not have any clients that fit this category record a 0 .

1.3.3 21 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 22 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 are also PEPs as at the end of the reporting period. This category is specific to clients who are legal persons and arrangements. An example includes, but not limited to, a client that is a corporate entity that has a director/senior manager who is also a PEP. If the entity does not have any clients that fit this category record a 0 .

1.3.5 23 Number of directors and/or senior management of clients who are PEPs & HNWI or Ultra HNWI. Enter the number of directors and/or senior management of the clients who are both PEPs and HNWI / Ultra-HNWI, at the end of the reporting period.

1.3.6 24 Number of clients with non-professional trustees (individuals) appointed, broken down by the nationality of the trustee. Enter the number of clients with non-professional trustees (individuals) appointed, broken down by the nationality of the trustee.

1.3.7 25 Enter the total number of PEPs within all client trust structures. Enter the total number of PEPs within all client trust structures.

1.4.1 26 Does the entity have any clients that are Gov / Pub Sector? Please answer Yes or No .

1.4.2 27 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 28 Gov / Pub Sector - Number of Transactions. Enter the number of transactions processed on behalf of clients that are government or public sector during the reporting period, broken down by government jurisdiction.

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1.4.4 29 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 30 Gov / Pub Sector - Value of Client Assets. Enter the value of client assets under management of the clients that are Government or Public sector, at the end of the reporting period. If there are no client assets under management, please record 0 .

1.4.6 31 Does the entity have any clients that are Trusts? Please answer Yes or No .

1.4.7 32 Trusts - Number of Clients. Enter the number of clients the entity has that are Trusts, as at the end of the reporting period.

1.4.8 33 Trusts - Number of Transactions. Enter the number of transactions processed on behalf of clients that are Trusts during the reporting period.

1.4.9 34 Trusts Value of Transactions. Enter the value of transactions processed for clients that are Trusts, during the reporting period.

1.4.10 35 Trusts - Value of Client Assets. Enter the value of client assets under management for clients that are Trusts, at the end of the reporting period. If there are no client assets under management, please record 0 .

1.4.11 36 Does the entity have any clients that are NPOs? Please answer Yes or No .

1.4.12 37 NPOs - Number of Clients, broken down by country of incorporation of the client. Enter the number of NPO clients the entity has, broken down by country of incorporation, as at the end of the reporting period.

1.4.13 38 NPOs - Number of Transactions. Enter the number of transactions processed on behalf of clients that are NPOs, during the reporting period.

1.4.14 39 NPOs Value of Transactions. Enter the value of transactions processed for clients that are NPOs, during the reporting period.

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Trusts Page 23 of 62 1.4.15 40 NPOs - Value of Client Assets. Enter the value of client assets under management for clients that are NPOs, as at the end of the reporting period. If there are no client assets under management, please record 0 . 1.4.16 41 Does the entity have any clients that are Private Trust Companies? Please answer Yes or No . 1.4.17 42 Private Trust Companies - Number of Clients. Enter the number of NPO clients the entity has, as at the end of the reporting period. 1.4.18 43 Private Trust Companies - Number of Transactions. Enter the number of transactions processed on behalf of clients that are Private Trust Companies, during the reporting period. 1.4.19 44 Private Trust Companies Value of Transactions. Enter the value of transactions processed for clients that are Private Trust Companies, during the reporting period. 1.4.20 45 Private Trust Companies - Value of Client Assets. Enter the value of client assets under management for clients that are Private Trust Companies, as at the end of the reporting period. If there are no client assets under management, please record 0 . 1.4.21 46 Does the entity have any clients that are Foundations? Please answer Yes or No . 1.4.22 47 Foundations - Number of Clients, broken down by country of establishment of the client. Enter the number of clients the entity has, that are Foundations, broken down by the country of establishment of the client, as at the end of the reporting period. 1.4.23 48 Foundations - Number of Transactions. Enter the number of transactions processed on behalf of clients that are a Foundation, during the reporting period. 1.4.24 49 Foundations Value of Transactions. Enter the value of transactions processed for clients that are Foundations, during the reporting period. 1.4.25 50 Foundations - Value of Client Assets. Enter the value of client assets under management for clients that are Foundations, at the end of the reporting period. If there are no client assets under management, please record 0 . 1.4.26 51 Does the entity have any clients that are Segregated Portfolio Companies? Please answer Yes or No . 1.4.27 52 Segregated Portfolio Companies - Number of Clients. Enter the number of clients the entity has that are Segregated Portfolio Companies as at the end of the reporting period. 1.4.28 53 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. 1.4.29 54 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. 1.4.30 55 Segregated Portfolio Companies - Value of Client Assets. Enter the value of client assets under management for clients that are Segregated Portfolio Companies, as at the end of the reporting period. If there are no client assets under management, please record 0 . 1.4.31 56 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. 1.4.32 57 Special Economic Zone - Number of Clients. Enter the number of clients the entity has, that are companies registered within a Special Economic Zone, as at the end of the reporting period. 1.4.33 58 Special Economic Zone - Number of Transactions. Enter the number of transactions conducted by clients that are companies registered in a Special Economic Zone, during the reporting period. 1.4.34 59 Special Economic Zone Value of Transactions. Enter the value of transactions processed for clients that are registered in a Special Economic Zone Companies, during the reporting period. 1.4.35 60 Special Economic Zone - Value of Client Assets. Enter the value of client assets under management for clients that are registered in a Special Economic Zone, as at the end of the reporting period. If there are no client assets under

management, please record 0 . 1.4.36 61 Does the entity have any clients that are Funds or Collective Investment Vehicles? Please answer Yes or No . Note that one client can fall under multiple categories of structure. 1.4.37 62 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 the reporting period. 1.4.38 63 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. 1.4.39 64 Funds/Collective Investment Vehicles Value of Transactions. Enter the value of transactions processed on behalf of clients who are Funds or Collective Investment Vehicles, during the reporting period. 1.4.40 65 Funds / Collective Investment Vehicles - Value of Client Assets. Enter the value of client assets under management for clients that are Funds / Collective Investment Vehicles, as at the end of the reporting period. If there are no client assets under management, please record 0 . 1.5.1 66 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 67 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. Version: 1.4 AML Survey Completion Guide: Trusts Page 26 of 62 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 68 Clients / Customers that are Natural Persons, broken down by Residency of the client. Enter the number of clients that are natural persons, broken down by their residency. This category is specific to clients who are natural persons who have a direct business relationship with the entity. 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 69 Total Transactions for the reporting period for all Natural Person clients. 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 70 Value of Assets Held Under Management for all Natural Person clients. Enter the total value of transactions for clients who are Natural Persons during the reporting period. 1.5.6 71 Natural Person Clients - Does the entity have any clients that are PEPs? Please answer Yes or No . This question does not apply to clients who are Legal Persons or Arrangements. 1.5.7 72 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. Version: 1.4 AML Survey Completion Guide: Trusts Page 27 of 62 1.5.8 73 Natural Persons - PEPs - Number of Transactions. Enter the number of transactions conducted by Natural Person clients that are PEPs, during the reporting period. 1.5.9 74 Value of Assets Held Under Management for Natural Person clients who are PEPs. Enter the total value of assets under management for Natural Persons clients who are PEPs, during the reporting period. 1.5.10 75 Does the entity have any Natural Person clients that are HNWI? Please answer Yes or No . This question does not apply to clients who are Legal Persons or Arrangements. Ultra-high-net-worth individuals (UHNWI) is an individual with a net worth of over C\$25,000,000 (US\$30,000,000). This category does NOT include those individuals who are Ultra HNWI. 1.5.11 76 Number of Natural Person clients who are HNWI. Enter the

number of Natural Person clients the entity has that are HNWI. This category does NOT include those individuals who are Ultra HNWI. 1.5.12 77 Natural Person Clients - HNWI - Number of Transactions. Enter the number of transactions conducted by Natural Person clients, who are HNWI, during the reporting period. 1.5.13 78 Does the entity have any Natural Person clients who are Ultra HNWI? Please answer Yes or No. This question does not apply to clients who are Legal Persons or Arrangements. 1.5.14 79 Number of Natural Person clients who are Ultra HNWI. Enter the number of Natural Person clients the entity has that are Ultra- HNWI at the end of the reporting period. 1.5.15 80 Natural Person Clients - Ultra HNWI- Number of Transactions. Enter the number of transactions conducted by Natural Person who are Ultra HNWI, during the reporting period. 1.5.16 81 Does the entity have any Natural Person clients that are PEPs and HNWI /Ultra HNWI? Please answer Yes or No. Version: 1.4 AML Survey Completion Guide: Trusts Page 28 of 62 1.5.17 82 Number of Natural Person Clients who are PEPs and HNWI / Ultra HNWI. Enter the number of Natural Person clients the entity has that are both PEPs and HNWI / Ultra HNWI, at the end of the reporting period. 1.5.18 83 Natural Person Clients - PEPs and HNWI / UHNWI - Number of Transactions. Enter the number of transactions conducted on behalf of Natural Person clients, who are both PEPs and HNWI/ Ultra HNWI, during the reporting period. 1.6.1 84 Number of clients that have settlors who are natural persons. Enter the total number of Settlers who are natural Persons. 1.6.2 85 Number of clients that have settlors who are Legal Persons. Enter the number of clients that have settlors that are Legal Persons. 1.6.3 86 Number of clients that have Nominee Settlers appointed, broken down by nationality or country of incorporation of the individual the nominee acts on behalf. Enter the number of clients that have a Nominee Settlor appointed, broken down by nationality or country incorporation of the individual the nominee is appointed on behalf. 1.6.4 87 Number of clients that have settlors that are Trusts. Enter the number of clients that have settlors that is a Trust at the end of the reporting period. 1.6.5 88 Number of clients that have settlors that are Beneficiaries. Enter the number of clients that have settlors that are also Beneficiaries. 1.6.6 89 Number of clients that have settlors that are PEPs. Enter the number of clients that have settlors that are PEPs. 1.6.7 90 Number of clients that have settlors that are HNWI. Enter the number of clients that have Settlers that are HNWI. 1.6.8 91 Number of clients with settlors where funds were received from a party other than the Settlor, broken down by nationality or country of incorporation of the settlor. Enter the number of Trust clients where funds were received from a party other than the Settlor, broken down by nationality or country incorporation of the settlor. 1.7.1 92 Number of clients with Beneficiaries that are Natural Persons, broken down by nationality of the Beneficiary. Enter the number of clients with Beneficiaries that are Natural Persons, broken down by nationality of the Beneficiary. 1.7.2 93 Number of clients with Beneficiaries that are Legal Persons, broken down by country of incorporation of the Beneficiary. Enter the number of clients with Beneficiaries that are Legal Persons, broken down by country of incorporation of the Beneficiary. Version: 1.4 AML Survey Completion Guide: Trusts Page 29 of 62 1.7.3 94 Number of clients with Beneficiaries that are Legal Arrangements, broken down by country of formation of the Beneficiary. Enter the number of clients with Beneficiaries that are Legal Arrangements, broken down by country of formation of the Beneficiary. 1.7.4 95 Number of clients with Beneficiaries that are PEPs. Enter the number of clients with Beneficiaries that are PEPs. 1.7.5 96 Number of clients with Beneficiaries that are HNWI. Enter the number of clients with Beneficiaries that are HNWI. 17.1.6 97 Number of clients with Beneficiaries that are Ultra HNWI. Enter the number of clients with

Beneficiaries that are Ultra HNWIs. 1.7.7 98 Number of clients where funds are paid to a third-party on behalf of the Beneficiary, broken down by nationality or country of incorporation of the beneficiary. Enter the number of clients where funds are paid to a third-party on behalf of the Beneficiary, or for another purpose, broken down by nationality or country of incorporation of the beneficiary. This category is specific to clients who are Trusts who made payments to a Beneficiary where the payment went to a third party whether for the Beneficiary's benefit or another purpose. 1.8.1 99 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 Providers, and TCSPs. Provide the total number of clients whose source of funding falls within the list of sectors. 1.8.2 100 Does the entity have any clients whose source of funding is from the Banking sector (excluding MSBs)? Please answer Yes or No . Version: 1.4 AML Survey Completion Guide: Trusts Page 30 of 62 1.8.3 101 Banking Institutions (excluding MSBs) - Number of Clients. Enter the number of clients the entity has whose source of funding is from the banking sector. 1.8.4 102 Does the entity have any clients whose source of funding is derived from financial regulated businesses (excluding: banking, MSBs, TCSPs, and VASPs)? Please answer Yes or No . 1.8.5 103 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, MSBs, VASPs, and TCSPs). 1.8.6 104 Does the entity have any clients whose source of funds are derived from Financial Leasing operations? Please answer Yes or No . 1.8.7 105 Financial Leasing- Number of Clients. Enter the number of clients the entity has, whose source of funding is from Financial Leasing operations. 1.8.8 106 Does the entity have any clients whose source of funds are derived from Money Lending operations? Please answer Yes or No . 1.8.9 107 Money Lending - Number of Clients. Enter the number of clients the entity has whose source of funding is from Money Lending operations. 1.8.10 108 Does the entity have any clients whose source of funds is derived from Accountancy (Audit / Assurance / Bookkeeping / Insolvency)? Please answer Yes or No . 1.8.11 109 Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Number of Clients. Enter the number of clients the entity has whose source of funds is derived from Accountancy (including any of: Audit, Assurance, Bookkeeping, and Insolvency). 1.8.12 110 Does the entity have any clients whose source of funds is derived from the Fintech industry? Please answer Yes or No . 1.8.13 111 Fintech - Number of Clients. Enter the number of clients the entity has whose source of funding is from the Fintech industry. Version: 1.4 AML Survey Completion Guide: Trusts Page 31 of 62 1.8.14 112 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 Service Business (MSBs) Virtual Assets Products and Services High Value Dealers Trust Service Providers, Company Managers or Corporate Service Providers (TCSPs) Import/Export Industry Shipping and Transport of Goods. Provide the total number of clients whose source of funding falls within the list of sectors. 1.8.15 113 Does the entity have any clients whose source of funds is derived from Legal Practitioners? Please answer Yes or No 1.8.16 114 Legal Practitioners Number of Clients Enter the number of clients the entity has whose source of funding is derived from being a Legal Practitioner. 1.8.17 115 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 1.8.18 116 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.

1.8.19 117 Does the entity have any clients whose source of funds are derived from Money Services Business operations? Please answer Yes or No . 1.8.20 118 Money Services Business - Number of Clients. Enter the number of clients whose source of funds are derived from Money Services Business operations. 1.8.21 119 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 . 1.8.22 120 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).

Version: 1.4 AML Survey Completion Guide: Trusts Page 32 of 62 1.8.23 121 Does the entity have any clients whose source of funds is derived through High Value Dealer operations? Please answer Yes or No . 1.8.24 122 High Value Dealers - Number of Clients. Enter the number of clients whose source of funds is derived from High Value Dealer operations. 1.8.25 123 Does the entity have any clients whose source of funds is derived from TCSP operations? Please answer Yes or No . 1.8.26 124 TCSPs - Number of Clients. Enter the number of clients the entity has whose source of funds is derived from TCSP operations. 1.8.27 125 Does the entity have any clients whose source of funds is derived from the Import / Export Industry? Please answer Yes or No . 1.8.28 126 Import / Export - Number of Clients. Enter the number of clients the entity has whose source of funds is derived from Import / Export business operations. 1.8.29 127 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 . 1.8.30 128 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. 1.8.31 129 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 Provide the total number of clients whose source of funding falls within the list of sectors. Version: 1.4 AML Survey Completion Guide: Trusts Page 33 of 62 Retail / Restaurant Cannabis Industry 1.8.32 130 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 . 1.8.33 131 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)? 1.8.34 132 Does the entity have any clients whose source of funds is derived through the Gambling industry (including online gambling)? Please answer Yes or No . 1.8.35 133 Gambling business (including online gambling) - Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements operating in the Gambling business (including online gambling), and natural persons that are employed in the Gambling business (including online gambling). 1.8.36 134 Does the entity have any clients whose source of funds is derived from the adult entertainment industry? Please answer Yes or No . 1.8.37 135 Adult Entertainment - Number of Clients. Enter the number of clients the entity has whose source of funds is derived from the Adult Entertainment Industry. 1.8.38 136 Does the entity have any clients whose source of funds are derived from the Defence Industry? Please answer Yes or No . 1.8.39 137 Defence Industry - Number of Clients. Enter the number of clients the entity has whose source of funds is derived from the Defence industry. 1.8.40 138 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 . 1.8.41 139 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. Version: 1.4 AML Survey Completion Guide: Trusts Page 34 of 62 1.8.42 140 Does the entity have any clients whose source of funds is derived from the Mining Industry? Please answer Yes or No . 1.8.43 141 Mining Industry - Number of Clients. Enter the number of clients the entity has whose source of funds is derived from the Mining Industry. 1.8.44 142 Does the entity have any clients whose source of funds are derived through operating in the Construction / Development industry? Please answer Yes or No . 1.8.45 143 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. 1.8.46 144 Does the entity have any clients whose source of funds are derived from operating in the Retail & Restaurant Business? Please answer Yes or No . 1.8.47 145 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. 1.8.48 146 Does the entity have any clients whose source of funds are derived through Cannabis Production & Distribution operations? Please answer Yes or No . 1.8.49 147 Cannabis Production & Distribution - Number of Clients. Enter the number of clients whose source of funds is derived from Cannabis Production & Distribution operations. 1.8.50 148 Does the entity have any clients whose source of funds is Unknown to the entity? Please answer Yes or No . 1.8.51 149 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 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. Version: 1.4 AML Survey Completion Guide: Trusts Page 35 of 62 1.8.52 150 Does the entity have any clients where their business / Source of Funding is not listed in a category above? Please answer Yes or No . 1.8.53 151 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. 1.9.1 152 Source of Funds Value of Client Assets. Enter the total value of client assets for clients whose source of funds 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. Enter the total value of client assets under management of the clients whose source of funds falls within the list of sectors. If there are no client assets under management, please record 0 . 1.9.2 153 Banking Institutions (excluding MSBs) - Value of Client Assets. Enter the value of client assets under management of clients whose source of funds are derived from the Banking Institutions (excluding MSBs). 1.9.3 154 Other Financial Regulated Business - Value of Client Assets. Enter the value of client assets under management of the clients whose source of funds is derived from Other Financial Regulated Business and not the following: banking, MSBs, VASPs, and TCSPs. 1.9.4 155 Financial Leasing - Value of Client Assets. Enter the value of client assets under management of clients whose source of funds is derived from Financial Leasing operations. 1.9.5 156 Money Lending- Value of Client Assets. Enter the value of client assets under management of clients whose source of funds are derived from Money Lending operations. 1.9.6 157 Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Value of Client Assets. Enter the value of client assets under management of clients whose source of funds are derived through Version: 1.4 AML Survey Completion Guide: Trusts Page 36 of 62

Accountant operations (Audit / Assurance / Bookkeeping / Insolvency). 1.9.7 158 Fintech - Value of Client Assets. Enter the value of client assets under management of the clients whose source of funds are derived through the Fintech industry. 1.9.8 159 Source of Funds Value of Client Assets. Enter the total value of client assets for clients whose source of funds falls within the list of sectors below: Legal Practitioners Dealers in Precious Metals and Stones MSBs Virtual Asset Products and Services High Value Dealers TCSPs Import/Export industry Shipping and Transport of Goods Enter the total value of client assets under management of the clients whose source of funds falls within the list of sectors. If there are no client assets under management, please record 0 . 1.9.9 160 Legal Practitioners Value of Client Assets. Enter the value of client assets under management of the clients whose source of funds is derived from Legal Practitioner operations. 1.9.10 161 Dealers in Precious Metals and Stones Enter the value of client assets under management of clients whose source of funds is derived from Dealers in Precious Metals and Stones operations. 1.9.11 162 Money Services Business - Value of Client Assets. Enter the value of client assets under management of clients whose source of funds is derived from Money Services Business operations. 1.9.12 163 Virtual Asset Products and Services - Value of Client Assets. Enter the value of client assets under management of clients whose source of funds is derived from the virtual asset sector (products, services, and investments). 1.9.13 164 High Value Dealers - Value of Client Assets. Enter the value of client assets under management of clients whose source of funds is derived from High Value Dealer operations. 1.9.14 165 TCSPs - Value of Client Assets. Enter the value of client assets under management of clients whose Version: 1.4 AML Survey Completion Guide: Trusts Page 37 of 62 source of funds is derived from TCSP operations. 1.9.15 166 Import / Export Industry - Value Client Assets. Enter the value of client assets under management of clients whose source of funds are derived from Import / Export operations. 1.9.16 167 Shipping and Transport of Goods - Value of Client Assets. Enter the value of client assets under management of clients whose source of funds are derived from Shipping and Transport of Goods operations. 1.9.17 168 Source of Funds Value of Client Assets Enter the total value of client assets for clients whose source of funds 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 Enter the total value of client assets under management of the clients whose source of funds falls within the list of sectors. If there are no client assets under management, please record 0 . 1.9.18 169 Real Estate Agents / Brokers - Value of Client Assets. Enter the value of client assets under management of clients whose source of funds is derived from the Real Estate industry (Agents, Brokers, and Sellers). 1.9.19 170 Gambling Business (including online gambling) - Value of Client Assets. Enter the value of client assets under management of clients whose source of funds is derived from Gambling. 1.9.20 171 Adult Entertainment - Value of Client Assets. Enter the value of client assets under management of clients whose source of funds is derived from operating in the Adult Entertainment industry. 1.9.21 172 Defence Industry - Value of Client Assets. Enter the value of assets under management of clients whose source of funds is derived from operating in the Defence Industry. 1.9.22 173 Oil and Gas Industry - Value of Client Assets. Enter the value of client assets under management of clients whose Version: 1.4 AML Survey Completion Guide: Trusts Page 38 of 62 source of funds is derived from operating in the Oil and Gas industry. 1.9.23 174 Mining Industry - Value of Client Assets. Enter the value of client assets under management of clients whose source of funds is derived from



operating in the Mining Industry. 1.9.24 175 Construction / Development - Value of Client Assets. Enter the value of client assets under management of clients whose source of funds is derived from operating in the Construction / Development industry. 1.9.25 176 Retail & Restaurant Business - Value of Client Assets. Enter the value of client assets under management of clients whose source of funds is derived from Retail & Restaurant Business operations. 1.9.26 177 Cannabis Production & Distribution - Value of Client Assets. Enter the value of client assets under management of clients whose source of funds is derived from operating in the Cannabis Production & Distribution business. 1.9.27 178 Industry / profession not known or not recorded - Value of Client Assets. Enter the value of client assets under management of clients whose source of funds is derived from unknown or unrecorded Industries / Professions. 1.9.28 179 Other - Not listed above - Value of Client Assets. Enter the value of client assets under management of clients whose source of funds is derived from industries/ Professions not listed above. 1.10.1 180 Does the entity have any comments or feedback for this tab? Please answer Yes or No. 1.10.2 181 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. 2.1.1 182 Number of clients with Discretionary Trusts. Enter the number of clients with Discretionary Trusts, at the end of the reporting period. Version: 1.4 AML Survey Completion Guide: Trusts Page 39 of 62 2.1.2 183 Number of clients with Non-Discretionary Trusts. Enter the number of clients with Non-Discretionary Trusts, at the end of the reporting period. 2.1.3 184 Number of clients with Star Trusts. Enter the number of clients with Star Trusts, at the end of the reporting period. 2.1.4 185 Number of clients with Unit Trusts. Enter the number of clients with Unit Trusts, at the end of the reporting period. 2.1.5 186 Number of clients with Employee Benefit Trusts. Enter the number of clients with Employee Benefit Trusts, at the end of the reporting period. 2.1.6 187 Number of clients with Fixed Interest Trusts. Enter the number of clients with Fixed Interest Trusts, at the end of the reporting period. 2.1.7 188 Number of clients with Charitable Trusts. Enter the number of clients with Charitable Trusts, at the end of the reporting period. 2.1.8 189 Number of clients with Nominee Trusts. Enter the number of clients with Nominee Trusts, at the end of the reporting period. 2.1.9 190 Number of clients with foreign law trusts, broken down by the country of trust formation. Enter the number of clients with Foreign Law trusts, broken down by the country of trust formation, at the end of the reporting period. 2.1.10 191 Value of assets of clients who are foreign law trusts, broken down by the country of trust formation. Enter the value of assets of foreign law trusts, broken down by the country of trust formation, at the end of the reporting period. 2.1.11 192 Number of clients with Trust Products not listed above. Enter the number of clients with other Trust Products not listed above, at the end of the reporting period. 2.1.12 193 Please indicate the Other Trust Products. Please detail the types of Other Trust Products. 2.2.1 194 Number of clients - Trustee. Enter the number of clients the entity provides Trustee Services to, at the end of the reporting period. 2.2.2 195 Number of clients - Executor Services Enter the number of clients the entity provides Executor Services to, at the end of the reporting period. Version: 1.4 AML Survey Completion Guide: Trusts Page 40 of 62 2.2.3 196 Number of clients Administrator Services. Enter the number of clients the entity provides Administrator Services to, at the end of the reporting period. 2.2.4 197 Number of clients - Protector Services. Enter the number of clients the entity provides Protector Services to, at the end of the reporting period. 2.2.5 198 Number of clients- Enforcer Services. Enter the number of clients the entity provides Enforcer Services to, at the end of the reporting period. 2.2.6 199 Number of

clients - Nominee Services. Enter the number of clients the entity provides Nominee Services to, at the end of the reporting period. 2.2.7 200 Number of clients - Registered Office Services. Enter the number of clients the entity provides Registered Office Services to, at the end of the reporting period. 2.2.8 201 Does the entity provide any other Services under its Trust Licence not mentioned above? Please answer Yes or No . 2.2.9 202 Number of Clients - Other Trust Services. Enter the number of clients where the entity provides other Trust Services, not listed above, at the end of the reporting period. 2.2.10 203 Please indicate all other Trust Services. Enter all other Trust Services that apply. 2.3.1 204 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. 2.3.2 205 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. 2.3.3 206 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. 2.3.4 207 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. 2.3.5 208 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. 2.3.6 209 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. 2.3.7 210 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. 2.3.8 211 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. 2.4.1 212 Does the entity facilitate payments of Clients in the form of Physical Cash? Please answer Yes or No . 2.4.2 213 Physical Cash - Number of Clients. Enter the number of the clients that made payments in the form of Physical Cash during the reporting period. 2.4.3 214 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 client. 2.4.4 215 Physical Cash - Value of Funds Transferred. 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 client. 2.4.5 216 Does the entity facilitate payments of Clients in the form of Virtual Currency? Please answer Yes or No . 2.4.6 217 Virtual Currency - Number of Clients. Enter the number of clients that conducted transactions in the form of Virtual Currency during the reporting period. 2.4.7 218 Virtual Currency - Number of Transactions. Enter the number of Virtual Currency transactions clients conducted, during the reporting period. 2.4.8 219 Virtual Currency - Value of Transactions. Enter the value of virtual currency transactions processed by or on behalf of clients. 2.4.9 220 Does the entity facilitate payments of Clients via Third Parties? Please answer Yes or No . 2.4.10 221 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. 2.4.11 222 Third Parties - Number of Transactions. Enter the number of Third-Party transactions processed by clients during the reporting period. 2.4.12 223 Third Parties - Value of Transactions. Enter the value of transactions processed by clients during the reporting period, using payments via Third Parties. 2.4.13 224 Does the entity facilitate payments of Clients via Credit Card? Please answer Yes or No . 2.4.14 225 Credit Card Payments - Number of Clients Enter the number of clients that made payments via Credit Card during the reporting period. 2.4.15 226 Credit Card Payments - Number of Transactions. Enter the number of transactions processed via credit card payments during the reporting period. 2.4.16 227 Credit Card Payments - Value of Transactions. Enter the value of Credit Card payments processed for clients during the reporting period. 2.4.17 228 Does the entity facilitate payments of Clients in the form of Wire Transfers? Please answer Yes or No . This section does not include Internal Bank Transfers. 2.4.18 229 Wire Transfers - Number of Clients. Enter the number of clients that made payments in the form of Wire Transfers during the reporting period. This section does not include Internal Bank Transfers. 2.4.19 230 Wire Transfers - Number of Transactions. Enter the number of Wire Transfer transactions that were conducted by clients, during the reporting period. This section does not include Internal Bank Transfers. 2.4.20 231 Wire Transfers - Value of Funds Transferred. Enter the value of Wire Transfer transactions conducted by clients during the reporting period. This section does not include Internal Bank Transfers. 2.4.21 232 Does the entity facilitate payments of Clients in the form of Transfer of Securities? Please answer Yes or No . 2.4.22 233 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. 2.4.23 234 Transfer of Securities - Number of Transactions. Enter the number transactions made by clients, during the reporting period, in the form of Transfer of Securities. 2.4.24 235 Transfer of Securities - Value of Funds Transferred. Enter the value of funds transferred to by clients during the reporting period, by way of Transfer of Securities. 2.4.25 236 Does the entity facilitate payments of Clients in other forms not listed above? Please answer Yes or No . 2.4.26 237 Other Forms of Payment - Number of Clients. Enter the number of clients which made payments using other Forms of Payment not listed above during the reporting period. 2.4.27 238 Other Forms of Payment - Number of Transactions. Enter the number of transactions conducted by clients during the reporting period, using Other Forms of Payment other than the ones listed above. Version: 1.4 AML Survey Completion Guide: Trusts Page 44 of 62 2.4.28 239 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. 2.4.29 240 Please indicate the types of Other Forms of Payments. List the Other Forms of Payment processed by clients during the reporting period, which are not listed above. 2.5.1 241 Total value of funds received, broken down by originating country of payment. Enter the total value of funds received from clients, or on behalf of clients, into the entity's custody during the reporting period. 2.5.2 242 Total number of transactions received, broken down by originating country of the transaction. Enter the total number of transactions, relating to funds received by clients, or on behalf of clients, into the entity's custody during the reporting period. 2.5.3 243 Total value of funds transferred out (remitted to clients or on behalf of clients), broken down by the country of payment destination. Enter the total value

of funds or client assets transferred out of the jurisdiction from the entity during the reporting period. 2.5.4 244 Total number of transactions transferred out, broken down by destination country of the transaction. Enter the total number of transactions relating to funds transferred out of the jurisdiction by the entity, during the reporting period. 2.6.1 245 Does the entity have any comments or feedback for this tab? Please answer Yes or No . If the entity had to provide estimates or did not have data to specific questions for this section Products and Services Risk , please use this section to explain the entity s response(s) provided. 2.6.2 246 Please use this area to provide any comments or feedback for this tab. Provide comments or feedback. Please include N/A if no comment. If the entity had to provide estimates or did not have sufficient data to respond to specific questions under this section - Products and Services Risk . Please use this section to explain the entity s response(s) provided. 3.1.1 247 Number of Clients - F2F. 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. Version: 1.4 AML Survey Completion Guide: Trusts Page 45 of 62 F2F channels include F2F; Referrals within Group F2F; Eligible Introducers - F2F; Other Introducers - F2F 3.1.2 248 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. 3.1.3 249 Total number of clients via Online Platforms. Provide the total number of clients, in the entity s entire portfolio, that were onboarded via Online platforms, and not only those onboarded during the reporting period. 3.1.4 250 Number of Clients through Referrals within Group - F2F. Enter the number of clients which were onboarded using referrals within Group - F2F during the reporting period, broken down by nationality of the BO. An example of Group F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself have F2F interaction with the clients. 3.1.5 251 Number of Clients 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, during the reporting period, broken down by the nationality of the BO. Example of Group Non F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself does not have F2F interaction with the clients. 3.1.6 252 Total number of Clients onboarded through Eligible Introducers. Total clients in the entity's entire portfolio that were onboarded using Eligible Introducers where the entity continues to rely on the Eligible Introducer for verification of the clients identity. An Eligible Introducer is a person who falls within one of the categories under Regulation 22(d) and who provides a written assurance pursuant to Regulation 24(2)(b) that they Version: 1.4 AML Survey Completion Guide: Trusts Page 46 of 62 verified the identity of an applicant for business, or beneficial owner, in accordance with Part IV of the AMLRs. 3.1.7 253 Number of Clients through Eligible Introducers. Enter the number of clients which were onboarded through Eligible Introducers during the reporting period, broken down by country of nationality of the BO. 3.1.8 254 Number of Clients through Other Introducers - Non-F2F. Enter the number of clients, that were onboarded through Other Introducers Non - F2F, broken down by the country of nationality of the BO, for the reporting period. 3.1.9 255 Clients via Online Platforms. Enter the number of clients which were onboarded during the reporting period, broken down by country of nationality of the BO. 3.2.1 256 Has the entity outsourced the role of AML Compliance Officer within the reporting period? Please answer Yes or No . 3.2.2 257 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. 3.2.3 258 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. 3.2.4 259 How many AML Compliance Officers did the entity have in the past 3 years? If no turnover of the Compliance Officer role in the three-year period, answer "1". 3.2.5 260 Has the entity outsourced the role of Money Laundering Reporting Officer within the reporting period? Please answer Yes or No . Version: 1.4 AML Survey Completion Guide: Trusts Page 47 of 62 3.2.6 261 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. 3.2.7 262 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. 3.2.8 263 How many Money Laundering Reporting Officers did the entity have in the past 3 years? If no turnover of the Money Laundering Reporting Officers role in the three-year period, answer "1". 3.2.9 264 Has the entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period? Please answer Yes or No . 3.2.10 265 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. 3.2.11 266 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. 3.2.12 267 How many Deputy Money Laundering Reporting Officers did the entity have in the past 3 years? If no turnover of the Deputy Money Laundering Reporting Officers role in the three-year period, answer "1". Version: 1.4 AML Survey Completion Guide: Trusts Page 48 of 62 3.2.13 268 Has the entity outsourced the function of Targeted Financial Sanction screening within the reporting period? Please answer Yes or No . 3.2.14 269 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. 3.2.15 270 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. 3.2.16 271 How many TFS Screening platforms have you had in the past 3 years? If no turnover of the Targeted Financial Sanction screening function in the three-year period, answer "1". 3.2.17 272 Has the entity outsourced the function of transaction monitoring within the reporting period?

Please answer Yes or No . 3.2.18 273 To whom has the transaction monitoring function been outsourced? If outsourced, select the status that best describes the outsource relationship transaction monitoring: Member within Group 3 rd Party and Member within Group 3 rd Party Select 3rd Party and Member within Group", in cases where the Transaction Monitoring services turnover that includes one of each within the reporting period. 3.2.19 274 What was the outsourcing country of the transaction monitoring function at the end of the reporting period? Enter the country the entity outsourced the transaction monitoring function to at the end of the reporting period. Version: 1.4 AML Survey Completion Guide: Trusts Page 49 of 62 3.2.20 275 How many Transaction monitoring platforms / services did the entity have in the past 3 years? If no turnover of the transaction monitoring platforms / services in the three-year period, answer "1". 3.2.21 276 Has the entity outsourced any Trust Services functions during the reporting period? Please answer Yes or No . 3.2.22 277 To whom has Trust Services Functions been outsourced? If outsourced, select the status that best describes the outsource relationship transaction monitoring: Member within Group 3 rd Party and Member within Group 3 rd Party Select 3rd Party and Member within Group", in cases where trust services were outsourced to both 3 rd parties and members within the group. 3.2.23 278 What was the country of the outsourced trust services function at the end of the reporting period? Enter the country of which the entity outsourced Trust services functions to, at the end of the reporting period. 3.2.24 279 Enter the number of Trust Services functions that were outsourced in the past 3 years. Enter the number of engagements where the entity outsourced Trust services, during the past 3 years. 1.3.1 280 Where is the entity s physical place of business? Select the country where the entity operates. 3.3.2 281 Number of branches, broken down by country of operation. Enter the number of branches by location, broken down by country of operation. If the entity does not have branches enter 0 . 3.3.3 282 Number of subsidiaries, broken down by country of operation. Enter the number of Subsidiaries by location, broken down by country of operation. If the entity does not have subsidiaries enter 0 . 3.3.4 283 In which country is the parent or holding company incorporated? Enter the country in which the entity s parent or holding company incorporated. 3.3.5 284 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. Version: 1.4 AML Survey Completion Guide: Trusts Page 50 of 62 AML Controls Questions: No. Question No. Question Description/Explanation 1.1.1 289 Does the Governing Body receive comprehensive reports, information and statistics regarding ML/TF/PF risks and issues? Please answer Yes or No . 1.1.2 290 Does the Governing Body review all AML/CFT/CPF related policies and procedures periodically? Please answer Yes or No . 1.1.3 291 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. For publicly listed entities please list beneficial ownership of 10% or more. 3.3.6 285 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. 3.3.7 286 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. 3.4.1 287 Does the entity have any comments or feedback for this tab? Please answer Yes or No . If the entity had to provide estimates or did not have sufficient data to respond to

specific questions, please use this section to explain the entity's response(s) provided.

3.4.2 288 Please use this area to provide any comments or feedback for this tab. Provide comments or feedback. Please include N/A if no comment. If the entity had to provide estimates or did not have sufficient data to respond to specific questions, please use this section to explain the entity's response(s) provided. Version: 1.4 AML Survey Completion Guide: Trusts Page 51 of 62

1.1.4 292 Is there an audit risk and compliance subcommittee? Please answer Yes or No .

1.1.5 293 Is there an approved Charter for the Governing Body and Sub- Committees? Please answer Yes or No .

1.1.6 294 Is the entity subject to group wide governance practices? Please answer Yes or No .

1.1.7 295 Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body? Please answer Yes or No .

1.1.8 296 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 .

1.1.9 297 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 .

1.1.10 298 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 .

1.1.11 299 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.

1.1.12 300 Are any of the entity's AML Officers, Shareholders, Beneficial Owners, Directors, or Senior Management PEPs? Please answer Yes or No .

1.1.13 301 Does the Board ensure that the AMLCO/MLRO receive the appropriate training? Please answer Yes or No .

1.2.1 302 Has an AML Compliance Officer been appointed? Please answer Yes or No .

1.2.2 303 Has an MLRO been appointed? Please answer Yes or No .

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1.2.3 304 Is a Deputy MLRO appointed? Please answer Yes or No .

1.2.4 305 Is the AMLCO employed at a managerial level of the company? Please answer Yes or No .

1.2.5 306 For reporting lines, does the AMLCO report to the Governing Body? Please answer Yes or No .

1.2.6 307 Does the AMLCO maintain independence from revenues related / client facing activities? Please answer Yes or No .

1.2.7 308 Does the AMLCO have sufficient compliance/AML skills and experience to perform their function? Please answer Yes or No .

1.2.8 309 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 .

1.2.9 310 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 .

1.2.10 311 Does the AMLCO provide oversight of the AML/CFT/CPF and Sanctions risk assessment framework and procedures? Please answer Yes or No .

1.2.11 312 Does the MLRO maintain independence from revenues related / client facing activities? Please answer Yes or No .

1.2.12 313 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 .

1.3.1 314 Has the entity developed and implemented AML/CFT/CPF and Sanctions training and awareness programme? Please answer Yes or No .

1.3.2 315 Have the directors received AML/CFT/CPF and Sanctions training during the reporting period? Please answer Yes or No .

1.3.3 316 Has the AML Compliance Officer received specialized compliance/AML/CFT/PF training Please answer Yes or No .

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over the last year relevant to the current position?

1.3.4 317 Has the MLRO received specialized

compliance/AML/CFT/PF training over the last year relevant to the current position? Please answer Yes or No . 1.3.5 318 Has the DMLRO received specialized compliance/AML/CFT/PF training over the last year relevant to the current position? Please answer Yes or No . 1.3.6 319 Does the AMLCO ensure that ongoing training programs are kept up to date and relevant? Please answer Yes or No . 1.3.7 320 Are changes to policy and procedures communicated to all staff/directors and senior management? Please answer Yes or No . 1.3.8 321 Does the entity assess AML/CFT/CPF and Sanctions knowledge of its employees? Please answer Yes or No . 1.3.9 322 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. 1.3.10 323 Does the AMLCO organize or ensure AML/CFT/CPF and Sanctions training is conducted for all staff annually? Please answer Yes or No . 1.4.1 324 Does the entity have an internal audit department / unit / function with oversight over AML functions? Please answer Yes or No . 1.4.2 325 Is there a developed Internal Audit plan, with focus on AML/CFT/CPF and Sanctions, reviewed by the Board? Please answer Yes or No . 1.4.3 326 Is the Internal Audit plan approved by the Board? Please answer Yes or No . 1.4.4 327 Does the internal AML audit include reviews of the AML/CFT/CPF related policies, procedures and processes? Please answer Yes or No . Version: 1.4 AML Survey Completion Guide: Trusts Page 54 of 62 1.4.5 328 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 . 1.4.6 329 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. 1.4.7 330 Does the Board review the AML audit program? Please answer Yes or No . 1.4.8 331 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. 1.4.9 332 Where applicable, does the internal audit include testing on functions which are outsourced? Please select Yes , No , or Not Applicable . 1.4.10 333 Where applicable, does the internal audit include testing of EI relationships? Please enter Yes, No, or Not Applicable. 1.4.11 334 Does the Internal Audit include testing for the AML/CFT/CPF and Sanctions training function? Please answer Yes or No . 1.4.12 335 Does the Internal Audit include testing for the entity's TFS and PF controls? Please answer Yes or No . 1.5.1 336 Does the entity conduct a business risk assessment which considers ML/TF/PF and Sanctions risk factors? Please answer Yes or No . 1.5.2 337 Does the entity employ a Risk Based Methodology when assessing and allocating oversight of its clients? Please answer Yes or No . 1.5.3 338 Does the entity consider the ML/TF/PF risks of the clients, (including BOs, in their risk assessment? Please answer Yes or No . 1.5.4 339 Does the entity consider the ML/TF/PF geographic location (also of counterparties and affiliates, Please answer Yes or No . Version: 1.4 AML Survey Completion Guide: Trusts Page 55 of 62 branches, subsidiaries etc.) in their risk assessment? 1.5.5 340 Does the entity consider the ML/TF/PF products and services (existing and new) in their risk assessment? Please answer Yes or No . 1.5.6 341 Does the entity consider the ML/TF/PF delivery channels (existing and new) in their risk assessment? Please answer Yes or No . 1.5.7 342 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 . 1.5.8 343



Does the entity consider the ML/TF/PF technology (existing and new) in their risk assessment? Please answer Yes or No . 1.5.9 344 Does the entity consider Sanctions risk factors in their risk assessment? Please answer Yes or No . 1.5.10 345 Does the entity consider PF risk factors in their risk assessment? Please answer Yes or No . 1.5.11 346 Does the entity consider outsourcing risk factors in its risk assessment? Please answer Yes or No . 1.5.12 347 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 . 1.5.13 348 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. 1.5.14 349 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. 1.5.15 350 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. Version: 1.4 AML Survey Completion Guide: Trusts Page 56 of 62 1.6.1 351 Does the entity rely on Group AML/CFT policies and procedures? Please answer Yes or No . 1.6.2 352 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 . 1.6.3 353 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 . 1.6.4 354 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 . 1.6.5 355 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 . 1.6.6 356 Does the entity have Board, or governing body, approved policies and procedures for establishing Source of Funds? Please answer Yes or No . 1.6.7 357 Does the entity have Board, or governing body, approved policies and procedures for employee screening? Please answer Yes or No . 1.6.8 358 Does the entity have Board or governing body approve policies and procedures for training of staff? Please answer Yes or No . 1.6.9 359 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 . 1.6.10 360 Does the entity have policies and procedures on collecting due diligence on counterparties and business associates? Please answer Yes or No . Version: 1.4 AML Survey Completion Guide: Trusts Page 57 of 62 1.6.11 361 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 . 1.6.12 362 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. 1.7.1 363 Does the entity have a screening process? Please answer Yes or No . 1.7.2 364 Is the screening process manual, automated or a combination? Select which best applies: Manual, Automated, or Automated with Manual Checks. 1.7.3 365 Is the screening process fully or partially outsourced? Please select Fully or Partially . 1.7.4 366 When designated lists are updated, does the screening process reflect these updates within 24 hours? Please answer Yes or No . 1.7.5 367 Is sanctions monitoring done in real time or after the event? Select what applies: No process , After the event , or Real time . 1.7.6 368 Is the customer and counterparty database screened against the designated H.M.

Treasury list? Please answer Yes or No . 1.7.7 369 Are procedures in place to ensure customers / counterparties are screened prior to payouts (remittance of funds)? Please answer Yes or No . 1.7.8 370 Does the entity have Asset Freeze procedures? Please answer Yes or No . 1.7.9 371 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 . 1.7.10 372 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 . Version: 1.4 AML Survey Completion Guide: Trusts Page 58 of 62 1.7.11 373 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 . 1.7.12 374 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 . 1.7.13 375 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 . 1.8.1 376 Does the entity have transaction monitoring policies and procedures developed commensurate to its operations? Please answer Yes or No . 1.8.2 377 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 . 1.8.3 378 Does the entity have in place an automated system for monitoring transactions for potential suspicion Please answer Yes or No . Version: 1.4 AML Survey Completion Guide: Trusts Page 59 of 62 and reporting suspicious transactions? 1.8.4 379 Is there a requirement for senior management approval before establishing high risk business relationships i.e. with PEPs? Please answer Yes or No . 1.8.5 380 Does the entity have EDD procedures? Please answer Yes or No . 1.8.6 381 Does the entity apply EDD on customers and counterparties based in higher-risk countries? Please answer Yes or No . 1.8.7 382 Where high risk clients are identified, did the entity conduct EDD measures for every transaction such customers carry out? Please answer Yes or No . 1.8.8 383 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. 1.9.1 384 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 . 1.9.2 385 Does the entity s policies and procedures identify the MLRO and how to make a filing to them? Please answer Yes or No . 1.9.3 386 Does the entity have policies and procedures for reporting to the FRA? Please answer Yes or No . 1.9.4 387 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. 1.9.5 388 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. 1.9.6 389 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. Version: 1.4 AML Survey Completion Guide: Trusts Page 60 of 62 1.9.7 390 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 . 1.9.8 391 Has the entity been penalized or received a warning for non-compliance, from the FRA? Please answer Yes or No . 1.9.9 392 Does the entity maintain a log identifying all internal SARs filed to the MLRO along with their status? Please answer Yes or No . 1.9.10 393 Does the entity maintain a log identifying all SARs filed to the FRA along with their status? Please answer Yes or No . 1.9.11 394 If the MLRO decides not to file a SAR to the FRA is the reason for not filing documented? Please answer Yes or No . 1.10.1 395 Does the entity maintain Record Keeping Procedures? Please answer Yes or No . 1.10.2 396 How many years after the end of the business relationship are records retained? Enter the number of years 1.10.3 397 Are any records retained and accessible in the Cayman Islands? Please answer Yes or No . 1.10.4 398 How accessible and swiftly available are records for competent authorities - in hours? Enter the average time to comply in hours. 1.10.5 399 Does the entity maintain a declined business log? Please answer Yes or No . 1.10.6 400 Does the entity maintain records of its training programme? Please answer Yes or No . 1.11.1 401 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. 1.11.2 402 Was a risk assessment conducted on all outsourcing arrangements prior to initiation of the arrangement? Select which best applies: Yes , No or Not Applicable . Version: 1.4 AML Survey Completion Guide: Trusts Page 61 of 62 1.11.3 403 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. 1.11.4 404 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. 1.11.5 405 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. 1.11.6 406 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. 1.11.7 407 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. 1.11.8 408 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. 1.11.9 409 If relevant, does the outsourced AMLCO/MLRO have access to the entity s board? Select which best applies: Yes , No or Not Applicable . This question is only applicable if the entity outsources any activities. 1.11.10 410 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. Version: 1.4 AML Survey Completion Guide: Trusts Page 62 of 62

1.11.11 411 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.

1.11.12 412 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.

1.12.1 413 Do you have any comments or feedback for this tab? Please answer Yes or No .

1.12.2 414 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.