



# Cayman Monetary Regulatory Authority International

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

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

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

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

AML Survey Completion Guide: Mutual Fund Administrators

Document version: 1.3 Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 2 of 53 Revision History: Effective Date Version Number Revision Description 28 September 2022 1.0 Initial release of document 3 October 2022 1.1 Update to definitions 31 May 2023 1.2 Updates to definitions, descriptions, explanations, and questions 31 May 2024 1.3 Updates to definitions, descriptions, explanations, and questions

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Survey Completion Guide Mutual Fund Administrator Page 4 of 53 1 INTRODUCTION The Cayman Monetary Regulatory Authority International (the Authority ) periodically undertakes sectoral ML/TF/PF and Sanctions risk assessments as part of its risk-based approach to AML/CFT supervision of regulated financial service providers ( FSPs ). In conducting sectoral ML/TF risk assessments and other related research, the Authority uses a software called STRIX to distribute the AML Survey to FSPs and further collect, analyse, model, and score ML/TF/PF and Sanctions risk data. FSPs are required to provide this data by completing the AML Survey Form and submit it through the Authority s web-based survey software, to the Anti-Money Laundering Division (the AMLD ). This AML Survey Form is issued in accordance with section 29(2)(c) of the Mutual Funds Act (2021 Revision). This Guide provides support to FSPs, which carry out mutual fund administration business, with accessing, completing and submitting the AML Survey Mutual Fund Administrator Form. 2 FORM INFORMATION The AML Survey Mutual Fund Administrator Form is to be completed by each FSP holding a Mutual Fund Administration licence, who are commonly referred to as Entity for purposes of this form. The AML Survey Mutual Fund Administrator Form is made up of two (2) sections for collecting AML risk data; the AML Inherent Risks and AML Controls. 3 ACCESSING AND SUBMITTING THE AML SURVEY 3.1 ACCESS TO THE AML SURVEY Entities will receive an invitation to the web-based survey by using the current contact details of the Entity which the Authority has on record. Each member of the Entity who receives an invitation can activate their own account. The invitation is specific to the recipient address and cannot be shared or forwarded. Clicking on the link provided in the invitation will take the user to the account creation webpage. On successful account activation, the user will receive a confirmation . Login then takes place via clicking on the Return Home button available immediately after activation, or via the link provided in the confirmation . Login is only possible using a two-factor verification code which will be sent by to the individual. If an Entity has multiple points of contact on file, they will all

have joint access to the same survey. The Authority is using the following entity contacts to distribute the AML Survey: Anti-Money Laundering Compliance Officer ( AMLCO ), Money Laundering Reporting Officer ( MLRO ), Registered Office, and any other additional contacts upon request from the Entity. If an Entity is unsure of what their contact details are, they can contact the Authority at .

Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 5 of 53 To access the AML Survey: 1. When the AML Survey is distributed from STRIX, the recipients will receive an invitation from Cayman Monetary Regulatory Authority International with the address . The will request the recipient to Confirm Account . The recipient should click on the Confirm Account button, which will redirect the recipient to the activation page using their default browser. A modern browser (e.g. MS Edge, Chrome, Safari) should be used for security purposes. 2. The recipient will then be asked to create a password using uppercase, lowercase, number, and a special character. The password is required to be between 8 and 16 characters long. Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 6 of 53 3. The recipient will be asked to re-enter their password. 4. Once the recipient s password has been re-entered, and matches, they can submit and finish the activation process. An Notification of Successful Activation will be sent providing a Go to Portal link which can be used for all future access. Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 7 of 53

5. The user should then click on the Return To Home button.

Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 8 of 53 6. The recipient should then enter their username, which is their address where they received the AML Survey invite, and the password they just created. 7. A six digit two-factor authentication code will be sent to the survey recipient s

Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 9 of 53 8. The recipient should enter the six (6) digit two-factor authentication code on the webpage where prompted. 9. Click Open to access the AML Survey request. If a survey recipient is a contact for two (2) or more FSPs, or where an Entity has two or more licences or registrations, related surveys will be listed here for the recipient to view and access. Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 10 of 53

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

Requests are to be submitted to detailing the following:

- i. Licence or Registration Name
- ii. Licenced or Registration Number
- iii. Date of Licence or Registration
- iv. List of current directors
- v. Number of Clients
- vi. Reason for requesting to make an Incomplete Submission.

2. If a user receives or has access to more than one survey, they will not see the additional survey(s) in the Current Surveys section of the web page. At the top of the page, where it shows the Entity name, there should be a bold blue number indicating the number of Entity accounts the user has access to. Once the user clicks the number, a drop-down list will appear displaying the additional Entity names.

3. The STRIX portal allows you to copy two-column lists from an Excel document and paste the data directly into the survey. Given that there are several questions in the survey that require country breakdown details, the ability to bulk paste into STRIX will ease the burden of inputting individual responses. To upload bulk entries for those country breakdown questions, please do the following:

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- 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; locked out for ten (10) minutes; and, if the user persists, locked out permanently. To avoid being locked out, if the user fails to remember their password, they should update their password on the login page. If the user is permanently locked out, they should contact 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.

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5 AML SURVEY GUIDANCE Below are descriptions and explanations to the risk factors and controls factors you are required to provide information about. The risk factors are used to assess Inherent ML/TF Risk. Control factors are used to assess the AML/CFT/CPF, and Sanctions controls the entity has in place.

AML Inherent Risk Factors Descriptions Terms/Abbreviations Definition/Meaning

AMLRs Anti-Money Laundering Regulations, (2023 Revision), as amended. AMLCO Anti-Money Laundering Compliance Officer BO Beneficial Owner (or UBO) (as defined in Regulation 2 of the Anti-Money Laundering Regulations (as revised)) means the natural person who ultimately owns or controls the customer or on whose behalf a transaction or activity is being conducted and includes but is not restricted to (a) in the case of a legal person other than a company

whose securities are listed on a recognized stock exchange, a natural person who ultimately owns or controls, whether through direct or indirect ownership or control, 10% or more of the shares or voting rights in the legal person. (b) in the case of any legal person, a natural person who otherwise exercises ultimate effective control over the management of the legal person. (c) in the case of a legal arrangement, the trustee or other person who exercises ultimate effective control over the legal arrangement. Client / Customer A person who is in a business relationship, or is carrying out a one-off transaction, with a person who is carrying out relevant financial business in the Islands. This includes both Natural Persons and Legal Persons and Arrangement Clients. Generally, for a Mutual Fund Administrator licence holder the client is a Fund. Corporate Entity A corporate body constituted under the Laws of the Islands or any other jurisdiction, which is formed specifically to perform activities, such as running an enterprise or holding assets. Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 13 of 53 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 Mutual Fund Administration licence that is responding to this survey. F2F The face-to-face engagement with a client directly, with the natural person physically present. The engagement will not be via , , online, etc. Foundation This definition refers to Cayman Islands foundation companies that are governed by the Companies Act (Revised), except to the extent that it is modified by the Foundation company Act, 2017 or those foundation companies established in other jurisdictions. FRA Financial Reporting Authority. Gov / Pub Sector Business conducted in or with Government or Public Sector. High Value Dealers Any business or sole trader that accepts or makes high value cash payments of US\$15,000 or more (or equivalent in any currency) in exchange for goods. Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 14 of 53 HNWI A high net worth individuals (HNWI) is: (i) an individual whose net worth is at least CI\$800,000 (approx. US\$1,000,000) or its equivalent in any other currency; or (ii) any person that has total assets of not less than CI\$4,000,000 (approx. US\$5,000,000) or its equivalent in any other currency. HNWIS are NOT Ultra HNWI and should not be double counted. Import and Export Business A company that facilitates trades of goods and commodities between domestic and foreign companies. In other words, it s a company that buys goods internationally and ships them in for domestic purchases and/or exports goods and services produced in the home country for sale to other markets. Individual A Natural Person that is not a Legal Person or Legal Arrangement. Investor Investor , in respect of a mutual fund, means the legal holder of record or legal holder of a bearer instrument representing an equity interest in the mutual fund but does not

include a promoter or operator as defined in the Mutual Funds Act (as amended) . Legal Person A company or other entity created by operation of law with separate legal personality. Legal Arrangement A trust or partnership, or other entity created between parties which lacks separate legal personality. MLRO Money Laundering Reporting Officer ML/TF/PF Money Laundering/Terrorism Financing/Proliferation Financing. Mutual Fund A company, unit trust or partnership that issues equity interests, the purpose or effect of which is the pooling of investor funds with the aim of spreading investment risks and enabling investors in the mutual fund to receive profits or gains from the acquisition, holding, management or disposal of investments but does not include a person licensed under the Banks and Trust Companies Act (2021 Revision) or the Insurance Act, 2010, or a person registered under the Building Societies Act (2020 Revision) or the Friendly Societies Act (1998 Revision). Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 15 of 53 Natural Person A human being, as distinguished from a company or other entity created by operation of law with separate legal personality. Nominee Director A natural or legal person who takes on the role of company director on the behalf of another. Nominee Shareholder A nominee shareholder is someone who acts as a legal, unrelated, third party, who is officially registered as the holder of shares on behalf of the actual shareholder. Non-face-to-face Or Non-F2F, where a customer can open an account and transact with a regulated financial service provider (FSP) without being physically present for identification purposes, at the physical premises/office of the FSP. NPO A legal person or arrangement that primarily engages in raising or disbursing funds for purposes such as charitable religious, cultural, educational, social or fraternal purposes, or for the carrying out of other types of good works . OSP Outsourced Service Provider (OSP) is a third party, either an affiliated entity within a group or an entity that is external to entity, that provides functions or activities on a continuing basis to a FSP, that would normally be undertaken by the regulated entity, now or in the future. Outsourcing does not include purchasing contracts. PEP Politically Exposed Person includes a) a person who is or has been entrusted with prominent public functions by a foreign country, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executive of a state-owned corporation, and important political party official. b) a person who is or has been entrusted domestically with prominent public functions, for example a Head of State or of government, senior politician, senior government, judicial or military official, senior executives of a state-owned corporation and important political party official; an 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 Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 16 of 53 director and a member of the board or equivalent functions. Politically exposed persons also include: (i) Family members of a PEP who are related either directly (consanguinity) or through marriage or similar (civil) forms of partnership. (ii) Close associates to PEPs: individuals who are closely connected to PEP, either socially or professionally. Reporting Period January 1 through December 31, 2023, and future calendar years thereafter. Source of Funds The origin of the assets that will be used to form and maintain the business relationship. A client can have multiple sources of funds which should be established and recorded separately. However, multiple sources of funds that were used when forming the business relationship and monitoring the ongoing activity should be counted together. Take this into account when answering questions relating to the Nature of Business Source of Funding. Special Economic Zone Business Any type of business authorised to be carried on in a special economic zone

pursuant to any Law in force in the Islands. Targeted Financial Sanctions (TFS) Means both asset freezing and restrictions and directions to prevent funds or other assets from being made available, directly, or indirectly, to or for the benefit of persons and entities designated by the Office of Financial Sanctions Implementation, HM Treasury ( OFSI ). TCSP Includes those entities conducting Trust, Company Manager, and Corporate Service Provider business. Transaction For the purposes of this survey, a transaction is the movement of assets, whether it be between the client and the entity, the client account and a third party, or the entity on behalf of the client. Fees paid from an external source, other than the client account held by the entity, should be reported as a transaction. Fees paid from client accounts, held by the entity, along with payments made to governments for taxes associated to securities trades should be excluded from the definition. Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 17 of 53 Trust A legal arrangement which distinguishes between the legal and beneficial ownership of property. Legal ownership is transferred to a trustee who manages and administers the property for the benefit of the beneficiaries or for the furtherance of certain purposes. Ultra HNWI Ultra-High Net Worth Individuals, also referred to as UHNWI, are all HNWIs whose net worth is greater than or equal to US\$30,000,000. Value of Assets Under Management The total market value of assets or investments managed on behalf of a client or clients. The total amount can represent one client's assets under management (AUM) or the entire investment portfolio. Virtual Assets Products and Services Includes those services identified within the Virtual Asset (Service Providers) Act (2022 Revision), or as amended, as well as products which include any digital representation of value that can be digitally traded, transferred or used for payment. Timeframe Assets Under Management Value of AUM as at the end of the reporting period. Timeframe Number of Clients Number of clients as at the end of the reporting period. Timeframe Number of Transactions Number of Transactions conducted for the client during the reporting period. AML Inherent Risk Questions: Ref. No. Question No. Question Description/Explanation 1.1.1 1 Total Clients / Customers. Enter the total number of clients the entity has at the end of the reporting period. Total clients consist of natural persons and legal persons and arrangements. 1.1.2 2 Total Transactions for the reporting period. Enter the total number of all transactions conducted for clients during the reporting period. Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 18 of 53 1.1.3 3 Total Value of Assets Under Management Enter the value of assets under management for clients, at the end of the reporting period. 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 subdivided by their country of incorporation as at the end of the reporting period. Examples include, but are not limited to, Limited Liability Companies, Non- Resident Companies, and Foundation companies. 1.1.5 5 Client / Customer who are Legal Arrangements, broken down by the country of establishment of the client. Enter the total number of clients that are Legal Arrangements, broken down by the country of establishment of the client, as at the end of the reporting period. If an entity does not have such clients, a 0 value should be used. Example of legal arrangement include but are not limited to Trusts and Partnerships. 1.1.6 6 Total number of PEPs. Enter the total number of PEPs, by nationality of the PEP, as at the end of the reporting period. Total PEPs should include, but may not be limited to, those who are clients that are Natural Persons, BOs, Directors, Investors, Promoters, or hold any other form of control, including signatories. 1.1.7 7 Total Number of Investors of clients. Enter the total number of Investors of all clients. 1.1.8 8 Total number of High Risk Clients. Enter the total

number of clients / customers that are high risk, at the end of the reporting period. 1.1.9 9 Total number of Non-Compliant Accounts at the end of the reporting period. Enter the number of customer accounts that remain non-compliant with required identification and verification procedures. 1.1.10 10 Total value of Clients / Funds, by geographic location of the assets, at the end of the reporting period. Enter the total value of Clients / Funds, by the geographic location where the assets of the Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 19 of 53 Funds are custodied, at the end of the reporting period. 1.2.1 11 Does the entity have any clients whose Investors are Individuals / Natural Persons? Please answer Yes or No . 1.2.2 12 Number of Individual / Natural Person Investors in all clients. Enter the number of Individual / Natural Person Investors of all clients. 1.2.3 13 Number of Individual / Natural Person Investors, in clients, who are PEPs. Enter the number of Individual / Natural Person Investors, in clients, who are PEPs, broken down by the nationality of the PEP. 1.2.4 14 Number of Individual / Natural Person Investors, in clients, who are HNWI's. Enter the number of Individual / Natural Person Investors, in clients, who are HNWI's. Do not include those individuals who are Ultra-HNWI's. 1.2.5 15 Number of Individual / Natural Person Investors, in clients, who are Ultra HNWI's. Enter the number of Individual / Investors, in clients, who are Ultra-HNWI's. 1.2.6 16 Does the entity have any clients whose Investors are Legal Persons? Please answer Yes or No . 1.2.7 17 Number Investors, in clients, who are Registered Companies. Enter the number of Investors, in clients, who are Registered Companies. 1.2.8 18 Number Investors, in clients, who are Foundations. Enter the number of Investors, in clients, who are Foundations. 1.2.9 19 Number of Investors, in clients, who are Gov / State Owned Entities (PEPs). Enter the number of investors, in clients, who are Gov / State-owned entities, broken down by the government jurisdiction. 1.2.10 20 Number of Investors, in clients, who are NPOs. Enter the number of investors, in clients, who are NPOs, broken down by the country of registration. 1.2.11 21 Does the entity have any clients whose Investors are Legal Arrangements? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 20 of 53 1.2.12 22 Number Investors, in clients, who are Trusts. Enter the number of investors, of clients, who are Trusts. 1.2.13 23 Number of Investors, in clients, who are Partnerships. Enter the number of investors, of clients, who are Partnerships. 1.3.1 24 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. This category is specific to all Legal persons and Arrangements. Examples include, but are not limited to, the total number of BOs of Corporate entities, Settlers of Trusts and General Partners of limited Partnerships. A BO should not be counted more than once regardless of the number of business relationships they have with the entity. 1.3.2 25 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. 1.3.3 26 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. 1.3.4 27 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. 1.3.5 28 Number of Clients that have BOs who are HNWI's. Enter the total number of clients that have BOs who are HNWI's. HNWI's is specific to those persons whose net worth is at least CI\$800,000 (approx. US\$1,000,000) and/or those that have assets valued at least CI\$4,000,000 (approx. US\$5,000,000) Do Not include clients/customers with net worth equal to or greater than US\$30,000,000 Version: 1.3 AML



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

1.3.6 29 Number of Clients that have BOs who are Ultra HNWIs. Enter the total number of clients who have BOs who are Ultra HNWIs. If the entity does not have any clients that fit this category record a 0 .

1.3.7 30 Number of BOs of clients who are Legal Persons or Arrangements which are also PEPs. Enter the total number of clients who are Legal Person and Legal Arrangements that have BOs who are PEPs, as at the end of the reporting period.

1.3.8 31 Number of clients that have Nominees acting on behalf of a beneficial owner, or a Nominee within the ownership structure, broken down by nationality of the beneficial owner. Enter the total number of clients that have nominees acting on behalf of beneficial owners, or within its ownership structure, broken down by nationality of the beneficial owner. This category is specific to clients who are Legal Persons and Arrangements.

1.4.1 32 Total Number of directors appointed to clients. Enter the total number of directors of clients, at the end of the reporting period.

1.4.2 33 Number of clients that have a nominee appointed on behalf of a director, broken down by country of nationality of the director. Enter the total number of clients which have nominee directors appointed, as at the end of the reporting period, broken down by country of nationality of the director and not the nominee director.

1.4.3 34 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).

1.4.4 35 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.

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1.4.5 36 Number of directors and/or senior management of clients who are High Net Worth Individuals. Enter the number of directors and/or senior management of the clients who are also HNWIs, as at the end of the reporting period. Do not include senior management who are Ultra HNWIs.

1.4.6 37 Number of directors and/or senior management of clients who are Ultra High Net Worth Individuals. Enter the number of directors and/or senior management of the clients who are also Ultra HNWIs, as at the end of the reporting period.

1.4.7 38 Number of directors and/or senior management of clients who are PEPs & HNWIs / Ultra-HNWIs. Enter the number of directors and/or senior management of the clients who are both PEPs and HNWIs / Ultra-HNWI, as at the end of the reporting period.

1.5.1 39 Does the entity have any clients that are Gov / Pub Sector? Please answer Yes or No .

1.5.2 40 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.

1.5.3 41 Gov / Pub Sector - Number of Transactions. Enter the number of transactions processed by clients that are Government or Public Sector during the reporting period.

1.5.4 42 Does the entity have any clients that are NPOs? Please answer Yes or No .

1.5.5 43 NPO - Number of Clients, broken down by country of incorporation of the client. Enter the number of NPO clients the entity has, as at the end of the reporting period broken down by country of incorporation of the client.

1.5.6 44 NPO - Number of Transactions. Enter the number of transactions conducted by clients that are NPOs during the reporting period.

1.5.7 45 Does the entity have any clients that are Foundations? Please answer Yes or No .

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1.5.8 46 Foundations - Number of Clients. Enter the number of clients the entity has that are

a Foundation, broken down by country of establishment of the client, at the end of the reporting period. 1.5.9 47 Foundations - Number of Transactions. Enter the number of transactions processed on behalf of clients that are a Foundation during the reporting period. 1.5.10 48 Does the entity have any clients that are Trusts? Please answer Yes or No . 1.5.11 49 Trusts - Number of Clients. Enter the number of clients the entity has, that are Trusts, broken down by country of establishment, as at the end of the reporting period. 1.5.12 50 Trusts - Number of Transactions. Enter the number of transactions processed for clients that are Trusts, during the reporting period. 1.5.13 51 Trusts Value of Legal Arrangements. Enter the value of clients who are Trusts at the end of the reporting period. 1.5.14 52 Does the entity have any clients that are Segregated Portfolio Companies? Please answer Yes or No . 1.5.15 53 Segregated Portfolio Companies - Number of Clients. Enter the number of clients which are Segregated Portfolio Companies, as at the end of the reporting period. 1.5.16 54 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. 1.5.17 55 Does the entity have any clients that operate from Special Economic Zone? Please answer Yes or No . 1.5.18 56 Special Economic Zone - Number of Clients. Enter the number of clients the entity has, that are registered / operate in a Special Economic Zone, as at the end of reporting period. 1.5.19 57 Special Economic Zone - Number of Transactions. Enter the number of transactions conducted by clients, that are registered / operate in a Special Economic Zone, during the reporting period. 1.5.20 58 Does the entity have any clients that are Funds / Collective Investment Vehicles? Please answer Yes or No . 1.5.21 59 Funds / Collective Investment Vehicles - Number of Clients. Enter the number of clients the entity has, that are Funds / Collective Investment Vehicles as at the end of reporting period. 1.5.22 60 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. 1.5.23 61 Does the entity have any clients that are Partnerships? Please answer Yes or No . 1.5.24 62 Partnerships Number of clients. Enter the number of clients the entity has that are Partnerships, as at the end of the reporting period. 1.5.25 63 Partnerships Number of Transactions. Enter the number of transactions processed on behalf of clients that are Limited Partnership during the reporting period. 1.6.1 64 Does the entity have any clients whose Promoters are Individuals / Natural Persons? Please answer Yes or No . 1.6.2 65 Number of Promoters of clients who are Natural Persons. Enter the number of Natural Person Promoters of clients broken down by the nationality of the Promoter. 1.6.3 66 Number of Natural Person Promoters of clients who are PEPs. Enter the number of Natural Person Promoters of clients who are PEPs, broken down by the nationality of the PEP. Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 25 of 53 1.6.4 67 Number of Natural Person Promoters of clients who are HNWIs. Enter the number of Natural Person Promoters of clients who are HNWIs. This category does NOT include those individuals who are Ultra HNWIs. 1.6.5 68 Number of Natural Person Promoters of clients who are Ultra HNWIs. Enter the number of Natural Person Promoters of clients who are Ultra- HNWIs. 1.6.6 69 Does the entity have any clients with promoters who are Legal Persons or Arrangements? Please answer Yes or No . 1.6.7 70 Number of Promoters, who are Legal Persons, of clients. Enter the number of Legal Person Promoters of clients, broken down by country of incorporation of the Promoter. 1.6.8 71 Number of Promoters, who are Legal Arrangements, of clients. Enter the number of

Legal Arrangement Promoters of clients, broken down by country of formation. 1.6.9 72 Number of Promoters, who are Gov / State-owned, of clients. Enter the number of Gov / State- owned Promoters of clients, broken down by government jurisdiction of the Promoter. 1.6.10 73 Number of Promoters, who are NPOs, of clients. Enter the number of Promoters that are NPOs, broken down by the country of incorporation of the Promoter. 1.7.1 74 Investors Nature of Business / Source of Funding: Enter the total number of investors 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 Assets Products and Services, and TCSPs. Enter the total number of investors of clients whose source of funding falls within the list of sectors, at the end of the reporting period. Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 26 of 53 1.7.2 75 Does the entity have any investors of clients whose source of funding is from the Banking sector (excluding MSBs)? Please answer Yes or No . 1.7.3 76 Banking Institutions (excluding MSBs) - Number of Investors. Enter the number of investors of clients the entity has whose source of funding is from the banking sector. 1.7.4 77 Does the entity have any Investors of clients whose source of funding is from the financial services sector, other than banking, VASPs, MSBs and TCSPs? Please answer Yes or No . 1.7.5 78 Other Financial Regulated Business - Number of Investors. Enter the number of investors of clients the entity has, whose source of funding is from the financial sector (excluding Banking, VASPs, MSBs and TCSPs). 1.7.6 79 Does the entity have any investors of clients whose source of funding is from Financial Leasing operations? Please answer Yes or No . 1.7.7 80 Financial Leasing- Number of Investors. Enter the number of investors of clients the entity has, whose source of funding is from Financial Leasing operations. 1.7.8 81 Does the entity have any investors of clients whose source of funding is from Money Lending operations? Please answer Yes or No . 1.7.9 82 Money Lending - Number of Investors. Enter the number of investors of clients the entity has whose source of funding is from Money Lending operations. 1.7.10 83 Does the entity have any investors of clients whose source of funding is through being an Accountant, (including any of: Audit, Assurance, Bookkeeping, Insolvency)? Please answer Yes or No . 1.7.11 84 Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Number of Clients. Enter the number of investors of clients whose source of funding is through being an Accountant, (including any of: Audit, Assurance, Bookkeeping, and Insolvency). Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 27 of 53 1.7.12 85 Does the entity have any investors of clients whose source of funding is from the Fintech industry? Please answer Yes or No . 1.7.13 86 Fintech - Number of Investors. Enter the number of investors of clients whose source of funding is from the Fintech industry. 1.7.14 87 Investors Nature of Business / Source of Funding: Enter the total number of investors of clients whose source of funding falls within the list of sectors below. Legal Practitioners Dealers in Precious Metals and Stones Money Services Business (MSBs) Virtual Asset Products and Services High Value Dealers Trust, Company Manager, and Corporate Service Providers (TCSPs) Import/Export Industry Shipping and Transport of Goods Enter the total number of investors of clients whose source of funding falls within the list of sectors, at the end of the reporting period. 1.7.15 88 Does the entity have any investors of clients whose source of funds is derived from Legal Practitioner business? Please answer Yes or No 1.7.16 89 Legal Practitioners Number of Investors. Enter the number of investors of clients whose source of funds is derived from Legal Practitioner business. 1.7.17 90 Does the entity have any investors of clients whose source of funds is derived from Dealers in Precious Metals

and Stones operations? Please answer Yes or No . 1.7.18 91 Dealers in Precious Metals and Stones - Number of Investors. Enter the number of investors of clients whose source of funds is derived from Dealers in Precious Metals and Stones operations. 1.7.19 92 Does the entity have any investors of clients whose source of funds are derived from Money Services Business operations? Please answer Yes or No . 1.7.20 93 Money Services Business - Number of Investors. Enter the number of investors of clients whose source of funds are derived from Money Services Business operations. Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 28 of 53 1.7.21 94 Does the entity have any investors of clients whose source of funds is derived from the virtual asset sector (products, services, investments)? Please answer Yes or No . 1.7.22 95 Virtual Asset Products and Services - Number of Investors. Enter the number of investors of clients whose source of funds is derived from the virtual asset sector (products, services, investments). 1.7.23 96 Does the entity have any investors of clients whose source of funds is derived through High Value Dealer operations? Please answer Yes or No . 1.7.24 97 High Value Dealers - Number of Investors. Enter the number of investors of clients whose source of funds is derived through High Value Dealer operations. 1.7.25 98 Does the entity have any investors of clients whose source of funds is derived from TCSP operations? Please answer Yes or No . 1.7.26 99 TCSPs - Number of Investors. Enter the number of investors of clients whose source of funds is derived from TCSP operations. 1.7.27 100 Does the entity have any investors of clients whose source of funds is derived from the Import / Export Industry? Please answer Yes or No . 1.7.28 101 Import / Export - Number of Investors. Enter the number of investors of clients whose source of funds is derived from the Import / Export Industry. 1.7.29 102 Does the entity have any investors of clients whose source of funding is derived from the Shipping and Transport of Goods industry? Please answer Yes or No . 1.7.30 103 Shipping and Transport of Goods - Number of Investors. Enter the number of investors of clients whose source of funding is derived from the Shipping and Transport of Goods industry. 1.7.31 104 Investors Nature of Business / Source of Funding: Enter the total number of investors of clients whose source of funding falls within the list of sectors below. Enter the total number of investors of clients whose source of funding falls within the list of sectors, at the end of the reporting period. Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 29 of 53 Real Estate Agents/Brokers Gambling Business Adult Entertainment Industry Defence Industry Oil and Gas Industry Mining Construction / Development Retail / Restaurant Cannabis Industry 1.7.32 105 Does the entity have any investors of clients whose source of funds is derived through the Real Estate industry (Agents / Brokers / sellers)? Please answer Yes or No . 1.7.33 106 Real Estate Agents / Brokers - Number of Investors. Enter the number of investors of clients whose source of funds is derived through the Real Estate industry (Agents / Brokers / sellers). 1.7.34 107 Does the entity have any investors of clients whose source of funds is derived through the Gambling industry (including online gambling)? Please answer Yes or No . 1.7.35 108 Gambling business (including online gambling) - Number of Investors. Enter the number of investors of clients whose source of funds is derived through the Gambling industry (including online gambling). 1.7.36 109 Does the entity have any investors of clients whose source of funds is derived from the adult entertainment industry? Please answer Yes or No . 1.7.37 110 Adult Entertainment - Number of Investors. Enter the number of investors of clients whose source of funds is derived from the adult entertainment industry. 1.7.38 111 Does the entity have any investors of clients whose source of funds are derived from the Defence Industry?

Please answer Yes or No . 1.7.39 112 Defence Industry - Number of Investors. Enter the number of investors of clients whose source of funds are derived from the Defence Industry.

1.7.40 113 Does the entity have any investors of clients whose source of funds are derived Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 30 of 53 from operating in the Oil and Gas Industry? 1.7.41 114 Oil and Gas Industry - Number of Investors. Enter the number of investors of clients whose source of funds are derived from operating in the Oil and Gas Industry. 1.7.42 115 Does the entity have any investors of clients whose source of funds is derived from the Mining Industry? Please answer Yes or No . 1.7.43 116 Mining Industry - Number of Investors. Enter the number of investors of clients whose source of funds is derived from the Mining Industry. 1.7.44 117 Does the entity have any investors of clients whose source of funds are derived through operating in the Construction / Development industry? Please answer Yes or No . 1.7.45 118 Construction / Development - Number of Investors. Enter the number of investors of clients whose source of funds are derived through operating in the Construction / Development industry. 1.7.46 119 Does the entity have any investors of clients whose source of funds are derived from operating in the Retail & Restaurant Business? Please answer Yes or No . 1.7.47 120 Retail & Restaurant Business - Number of Investors. Enter the number of investors of clients whose source of funds are derived from operating in the Retail & Restaurant Business. 1.7.48 121 Does the entity have any investors of clients whose source of funds are derived through Cannabis Production & Distribution operations? Please answer Yes or No . 1.7.49 122 Cannabis Production & Distribution - Number of Investors. Enter the number of investors of clients whose source of funds are derived through Cannabis Production & Distribution operations. 1.7.50 123 Does the entity have any investors of clients whose source of funds is Unknown to the entity? Please answer Yes or No . 1.7.51 124 Unknown Businesses and Professions - Number of Investors. Enter the number of investors of clients the entity has, that are Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 31 of 53 legal persons or arrangements of Unknown Businesses and Professions, and natural persons that are employed in Unknown Businesses and Professions. Unknown business and profession 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 Investor. 1.7.52 125 Does the entity have any investors of clients whose source of funding is not listed in a category above? Please answer Yes or No . 1.7.53 126 Other - Not mentioned above - Number of Investors. Enter the number of investors of clients whose source of funds is not listed in a category above.

1.8.1 127 Does the entity have any comments or feedback for this tab? Please answer Yes or No . 1.8.2 128 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.

2.1.1 129 Number of Clients - Registered Fund. Enter the number of clients who are a Registered Fund, at the end of the reporting period.

2.1.2 130 Number of Clients -Master Fund. Enter the number of clients who are a Master Fund at the end of the reporting period.

2.1.3 131 Number of Clients - Limited Investor Fund. Enter the number of clients who are a Limited Investor Fund, at the end of the reporting period.

2.1.4 132 Number of Clients - Administered Fund. Enter the number of clients who are an Administered Fund, as at last date of reporting period.

2.1.5 133 Number of Clients - Licensed Fund. Enter the number of clients who are a Licensed Fund, at the end of the reporting period.

2.1.6 134 Number of Clients - Private Fund. Enter the number of clients who are a Private Fund, at the end of the reporting period. Version: 1.3 AML Survey

Completion Guide Mutual Fund Administrator Page 32 of 53 2.1.7 135 Number of Clients - Non-fund Arrangements. Enter the number of clients who are a Non-fund Arrangement, at the end of the reporting period. 2.1.8 136 Number of Clients Unregulated. Enter the number of clients who are Unregulated, at the end of the reporting period. 2.2.1 137 Number of Clients - Principal Office. Enter the number of clients provided the service of Principal Office by the entity, at the end of the reporting period. 2.2.2 138 Number of Clients - Registrar and Transfer Agency (RTA) Services. Enter the number of clients provided the service of Registrar and Transfer Agency (RTA) by the entity, at the end of the reporting period. 2.2.3 139 Number of Clients - Net Asset Value (NAV) Calculation Services. Enter the number of clients provided the service of Net Asset Value (NAV) Calculations by the entity, at the end of the reporting period. 2.2.4 140 Number of Clients - Operator Services. Enter the number of clients provided the service of Operator Services (Director or General Partner) by the entity at the end of the reporting period. 2.2.5 141 Number of Clients - Registered Office Services. Enter the number of clients provided the service of a Registered Office by the entity, at the end of the reporting period. 2.2.6 142 Number of Clients - Director Services Enter the number of clients provided Director Services by the entity, at the end of the reporting period. 2.2.7 143 Number of Clients - Nominee Shareholder Enter the number of clients provided Nominee Shareholder services by the entity, at the end of the reporting period. 2.2.8 144 Number of Clients BO Filing Services Enter the number of clients provided BO Filing Services by the entity, at the end of the reporting period. Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 33 of 53 2.2.9 145 Number of Clients - Company Secretary Services Enter the number of clients provided Company Secretary Services by the entity, at the end of the reporting period. 2.2.10 146 Number of Clients - Statutory Filings Services Enter the number of clients provided Statutory Filing Services by the entity, at the end of the reporting period. 2.2.11 147 Number of Clients the entity provides MLRO Services. Enter the number of clients provided the service of MLRO &/or Deputy MLRO by the entity, at the end of the reporting period. 2.2.12 148 Number of Clients the entity provides AML Compliance Officer Services. Enter the number of clients provided the service of an AMLCO by the entity, at the end of the reporting period. 2.2.13 149 Does the entity provide other services, under its Trust Licence, to clients that are not listed above? Please answer Yes or No . 2.2.14 150 Number of Clients the entity provides other service not mentioned above. Enter the number of clients the entity provides other services, not mentioned above, to under their Trust Licence. 2.2.15 151 Please describe the other types of services, that are not listed above, provided to clients. Provide a description of the other services the entity provides to clients under its Trust Licence. 2.3.1 152 Does your entity facilitate payments to/ from Clients in the form of Physical Cash? Please answer Yes or No . 2.3.2 153 Physical Cash - Number of Clients. Enter the number of clients which made payments in the form of Physical Cash during the reporting period. 2.3.3 154 Physical Cash - Value of Funds Transferred. Enter the value of the Physical Cash transactions conducted by clients during the reporting period. Payments include those between the entity and the client and those conducted on behalf of the entity. Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 34 of 53 2.3.4 155 Does the entity facilitate payments to/ from Clients in the form of Virtual Assets? Please answer Yes or No . 2.3.5 156 Virtual Assets - Number of Clients. Enter the number of clients which had payments in the form of Virtual Assets during the reporting period. 2.3.6 157 Virtual Assets - Value of Funds Transferred. Enter the value of the Virtual Assets transactions entered into by clients during the reporting period. 2.3.7 158 Does the entity

facilitate payments to/ from Clients via Third Parties? Please answer Yes or No . 2.3.8 159 Third Parties - Number of Clients. Enter the number of clients which conducted payments via Third Parties during the reporting period. Payments via third party means that the payment was paid to a third party not associated with the business relationship or transaction. 2.3.9 160 Third Parties - Value of Funds Transferred. Enter the value of the Third- Party transactions entered into by clients during the reporting period. 2.3.10 161 Does your entity facilitate payments to/ from Clients via Credit Card? Please answer Yes or No . 2.3.11 162 Credit Card Payments - Number of Clients. Enter the number of clients which had payments via Credit Card during the reporting period. 2.3.12 163 Credit Card Payments - Value of Funds Transferred. Enter the value of Credit Card transactions processed for clients during the reporting period. 2.3.13 164 Does your entity facilitate payments to/ from Clients in the form of Wire Transfers? Please answer Yes or No . 2.3.14 165 Wire Transfers - Number of Clients. Enter the number of clients which made payments in the form of Wire Transfers during the reporting period. Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 35 of 53 2.3.15 166 Wire Transfers - Value of Funds Transferred. Enter the value of funds wire transferred by clients during the reporting period. 2.3.16 167 Does your entity facilitate payments to/ from Clients in the form of Transfer of securities from another provider? Please answer Yes or No . 2.3.17 168 Transfer of Securities from another provider - Number of Clients. Enter the number of clients which transferred securities from another provider, during the reporting period. 2.3.18 169 Transfer of Securities from another provider - Value of Funds Transferred. Enter the value of all transactions relating to Transfer of securities from another provider, conducted by clients during the reporting period. 2.3.19 170 Does your entity facilitate payments to/ from Clients in other forms not listed above? Please answer Yes or No . 2.3.20 171 Other Payment Forms - Number of Clients. Enter the number of clients which made payments using other forms of payment not listed above during the reporting period. 2.3.21 172 Other Payment Forms - Value of Funds Transferred. Enter the value of funds that were transferred by clients using other forms of payments, during the reporting period. 2.3.22 173 Please indicate the types of Other Forms of Payments. List the other forms of payment conducted by clients during the reporting period, which are not listed above. 2.4.1 174 Total value of funds received, broken down by originating country of payment. Enter the total value of funds received by clients, or on behalf of clients, during the reporting period, broken down by the country where the funds originated. These are funds transferred into the jurisdiction either into the regulated entity or through the jurisdictions banking system, or both. 2.4.2 175 Total number of transactions received, broken down by origin country of the transaction. Enter the total number of transactions, relating to funds received by clients, or on behalf Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 36 of 53 of clients, during the reporting period, broken down by country of origin of the funds. These are funds transferred into the jurisdiction either into the regulated entity or through the jurisdictions banking system, or both. 2.4.3 176 Total value of funds transferred out (remitted to clients or on behalf of clients), broken down by the country of payment destination. Enter the total value of funds transferred out (remitted out by clients or on behalf of clients) during the reporting period, broken down by the country of payment destination. 2.4.4 177 Total number of transactions transferred out (remitted to clients or on behalf of clients), broken down by the country of payment destination. Enter the total number of transaction of funds transferred out of the jurisdiction by clients, broken down by the country of payment destination. 2.5.1 178 Does the entity have any comments or feedback for this tab? Please

answer Yes or No . 2.5.2 179 Please use this area to provide any comments or feedback for this tab. Provide comments or feedback. Please include N/A if no comment. 3.1.1 180 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. 3.1.2 181 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. 3.1.3 182 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 Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 37 of 53 only those onboarded during the reporting period. 3.1.4 183 Number of Clients through Referrals within Group - F2F during the reporting year. Enter the number of clients which were onboarded using referrals within Group - F2F for the reporting period. 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. 3.1.5 184 Number of Clients through Referrals within Group - Non F2F during the reporting year. Enter the number of clients which were onboarded using referrals within Group and via Non Face to Face Channels for the reporting period. Example of Group Non F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself does not have F2F interaction with the clients. 3.1.6 185 Total number of Clients onboarded through Eligible Introducers. Total clients in the entity's entire portfolio that were onboarded using Eligible Introducers where the entity continues to rely on the Eligible Introducer for verification of the clients identity. An Eligible Introducer is a person who falls within one of the categories under Regulation 22(d) and who provides a written assurance pursuant to Regulation 24(2)(b) that they verified the identity of an applicant for business, or beneficial owner, in accordance with Part IV of the AMLRs. 3.1.7 186 Number of Clients through Eligible Introducers during the reporting period. Enter the number of clients which were onboarded through Eligible Introducers during the reporting period. 3.1.8 187 Number of clients onboarded through use of Agents or Nominees during the reporting period. Enter the number of clients onboarded placing reliance on Agents or Nominees, for the reporting period. 3.1.9 188 Number of Clients through Other Introducers - Non-F2F during the reporting period. Enter the number of clients, that were onboarded through Other Introducers Non F2F for the reporting period. Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 38 of 53 3.1.10 189 Number of Clients via Online Platforms during the reporting period. Enter the number of clients which were onboarded during the reporting period. 3.2.1 190 Has the entity outsourced the role of AML Compliance Officer within the reporting period? Please answer Yes or No . 3.2.2 191 To whom has the AML Compliance Officer role been outsourced? If outsourced, select the status that best describes the outsourced 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 a case of the Compliance Officer turnover that includes one of each within the reporting period. 3.2.3 192 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. 3.2.4 193 How many AML Compliance Officers has the entity had within the past 3 years? If no turnover of the AML Compliance Officer role in the three-year period, answer "1". 3.2.5 194 Has the entity



outsourced the role of Money Laundering Reporting Officer within the reporting period? Please answer Yes or No . 3.2.6 195 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 a case of the Money Laundering Reporting Officer turnover that includes one of each within the reporting period. 3.2.7 196 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. 3.2.8 197 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". 3.2.9 198 Has the entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period? Please answer Yes or No . 3.2.10 199 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 a case of the Deputy Money Laundering Reporting Officer turnover that includes one of each within the reporting period. 3.2.11 200 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. 3.2.12 201 How many Deputy Money Laundering Reporting Officers has the entity had in the past 3 years? If no turnover of the Deputy Money Laundering Reporting Officers role in the three-year period, answer "1". 3.2.13 202 Has the entity outsourced the function of Targeted Financial Sanction screening within the reporting period? Please answer Yes or No . 3.2.14 203 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 a case of the screening of targeted financial sanctions turnover Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 40 of 53 that includes one of each within the reporting period. 3.2.15 204 What was the outsourcing country of the Targeted Financial Sanction screening function at the end of the reporting period? Enter the country the entity outsourced the Targeted Financial Sanction screening function to, as at the end of the reporting period. 3.2.16 205 How many TFS Screening platforms / software did the entity have in the past 3 years? If no turnover of the Targeted Financial Sanction screening function in the three-year period, answer "1". 3.2.17 206 Has the entity outsourced the function of transaction monitoring within the reporting period? Please answer Yes or No . 3.2.18 207 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 3rd Party and Member within Group 3rd Party Select 3rd Party and Member within Group", in a case of transaction monitoring services turnover that includes one of each within the reporting period. 3.2.19 208 What was the outsourcing country of the transaction monitoring function at the end of the reporting period? Enter the country the entity outsourced the transaction monitoring function to at the end of the reporting period. 3.2.20 209 How many transaction monitoring platforms /

software did the entity have in the past 3 years? If no turnover of the transaction monitoring platform in the three- year period, answer "1". 3.2.21 210 Has the entity outsourced any of its MFA functions during the reporting period? Please answer Yes or No . 3.2.22 211 To whom has MFA Services function been outsourced? If outsourced, select the status that best describes the outsource relationship transaction monitoring: Member within Group 3rd Party and Member within Group 3rd Party Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 41 of 53 Select 3rd Party and Member within Group", in a case of transaction monitoring services turnover that includes one of each within the reporting period. 3.2.23 212 What was the country of the outsourced MFA services function at the end of the reporting period? Enter the country the entity outsourced the MFA services function to at the end of the reporting period. 3.2.24 213 Enter the number of MFA Service functions that were outsourced in the past 3 years. If no turnover of the transaction monitoring platform in the three- year period, answer "1". 3.3.1 214 Physical presence - Place of Business. Enter the country of the entity s physical business operations. 3.3.2 215 Number of branches by location, broken down by country of operation. Enter the number of branches the entity has, broken down by country of operation. 3.3.3 216 Number of Subsidiaries by location, broken down by country of operation. Enter the number of subsidiaries the entity has, broken down by country of operation. 3.3.4 217 In which country is the parent or holding company incorporated? Enter the country the parent or holding company incorporated. 3.3.5 218 In which countries, by percentage of equity ownership, are shareholders of the entity located. For publicly listed entities please list beneficial ownership of 10% or more. Select the countries where all shareholders of the entity are located and their percentage of equity ownership. For publicly listed entities please list beneficial ownership of 10% or more. 3.3.6 219 How many Beneficial Owners does the entity have, by country of nationality of the Beneficial Owner, at the end of the reporting period? Enter the number of Beneficial Owners of the entity, holding 10% or more, broken down by country of nationality of the shareholder(s). 3.3.7 220 How many directors does the entity have appointed, by country of nationality of the director, at the end of the reporting period? Enter the number of directors of the entity, broken down by country of nationality of the directors. 3.4.1 221 Does the entity have any comments or feedback for this tab? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 42 of 53 3.4.2 222 Please use this area to provide any comments or feedback for this tab. Use this area to provide any comments or feedback for this tab. Please enter 'NA' if no comment. AML Controls Questions: No. Question No. Question Description/Explanation 1.1.1 223 Does the Governing Body receive comprehensive reports, information and statistics regarding ML/TF/PF risks and issues? Please answer Yes or No . 1.1.2 224 Does the Governing Body review all AML/CFT/CPF related policies and procedures periodically? Please answer Yes or No . 1.1.3 225 What is the frequency, in months, that AML/CFT/CPF and Sanctions matters are reported to the Board? Enter the frequency in number of months. 1.1.4 226 Is there an audit risk and compliance subcommittee? Please answer Yes or No . 1.1.5 227 Is there an approved Charter for the Governing Body and Sub-Committees? Please answer Yes or No . 1.1.6 228 Is the entity subject to group wide governance practices? Please answer Yes or No . 1.1.7 229 Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body? Please answer Yes or No . 1.1.8 230 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 . 1.1.9 231 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 . Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 43 of 53

1.1.10 232 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 .

1.1.11 233 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.

1.1.12 234 Are any of the entity's AML Officers, Shareholders, Beneficial Owners, Directors, or Senior Management PEPs? Please answer Yes or No .

1.1.13 235 Does the Board ensure that the AMLCO/MLRO receive the appropriate training? Please answer Yes or No .

1.2.1 236 Has an AML Compliance Officer been appointed? Please answer Yes or No .

1.2.2 237 Has an MLRO been appointed? Please answer Yes or No .

1.2.3 238 Is a Deputy MLRO appointed? Please answer Yes or No .

1.2.4 239 Is the AMLCO employed at a managerial level of the company? Please answer Yes or No .

1.2.5 240 For reporting lines, does the AMLCO report to the Governing Body? Please answer Yes or No .

1.2.6 241 Does the AMLCO maintain independence from revenues related / client facing activities? Please answer Yes or No .

1.2.7 242 Does the AMLCO have sufficient compliance/AML skills and experience to perform their function? Please answer Yes or No .

1.2.8 243 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 .

1.2.9 244 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 . Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 44 of 53

1.2.10 245 Does the AMLCO provide oversight of the AML/CFT/CPF and Sanctions risk assessment framework and procedures? Please answer Yes or No .

1.2.11 246 Does the MLRO maintain independence from revenues related / client facing activities? Please answer Yes or No .

1.2.12 247 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 .

1.3.1 248 Has the entity developed and implemented AML/CFT/CPF and Sanctions training and awareness programme? Please answer Yes or No .

1.3.2 249 Have the directors received AML/CFT/CPF and Sanctions training during the reporting period? Please answer Yes or No .

1.3.3 250 Has the AML Compliance Officer received specialized compliance/AML/CFT/CPF training over the last year relevant to the current position? Please answer Yes or No .

1.3.4 251 Has the MLRO received specialized compliance/AML/CFT/CPF training over the last year relevant to the current position? Please answer Yes or No .

1.3.5 252 Has the DMLRO received specialized compliance/AML/CFT/CPF training over the last year relevant to the current position? Please answer Yes or No .

1.3.6 253 Does the AMLCO ensure that ongoing training programs are kept up to date and relevant? Please answer Yes or No .

1.3.7 254 Are changes to policy and procedures communicated to all staff/directors and senior management? Please answer Yes or No .

1.3.8 255 Does the entity assess AML/CFT/CPF and Sanctions knowledge of its employees? Please answer Yes or No .

1.3.9 256 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. Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 45 of 53

1.3.10 257 Does the AMLCO organize or ensure

AML/CFT/CPF and Sanctions training is conducted for all staff annually? Please answer Yes or No . 1.4.1 258 Does the entity have an internal audit department / unit / function with oversight over AML functions? Please answer Yes or No . 1.4.2 259 Is there a developed Internal Audit plan, with focus on AML/CFT/CPF and Sanctions, reviewed by the Board? Please answer Yes or No . 1.4.3 260 Is the Internal Audit plan approved by the Board? Please answer Yes or No . 1.4.4 261 Does the internal AML audit include reviews of the AML/CFT/CPF related policies, procedures and processes? Please answer Yes or No . 1.4.5 262 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 . 1.4.6 263 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. 1.4.7 264 Does the Board review the AML audit program? Please answer Yes or No . 1.4.8 265 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. 1.4.9 266 Where applicable, does the internal audit include testing on functions which are outsourced? Please select Yes , No , or Not Applicable . 1.4.10 267 Where applicable, does the internal audit include testing of EI relationships? Please enter Yes, No, or Not Applicable. 1.4.11 268 Does the Internal Audit include testing for the AML/CFT/CPF and Sanctions training function? Please answer Yes or No . 1.4.12 269 Does the Internal Audit include testing for the entity's TFS and PF controls? Please answer Yes or No . 1.5.1 270 Does the entity conduct a business risk assessment which considers ML/TF/PF and Sanctions risk factors? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 46 of 53 1.5.2 271 Does the entity employ a Risk Based Methodology when assessing and allocating oversight of its clients? Please answer Yes or No . 1.5.3 272 Does the entity consider the ML/TF/PF risks of the clients, (including BOs, in their risk assessment? Please answer Yes or No . 1.5.4 273 Does the entity consider the ML/TF/PF geographic location (also of counterparties and affiliates, branches, subsidiaries etc.) in their risk assessment? Please answer Yes or No . 1.5.5 274 Does the entity consider the ML/TF/PF products and services (existing and new) in their risk assessment? Please answer Yes or No . 1.5.6 275 Does the entity consider the ML/TF/PF delivery channels (existing and new) in their risk assessment? Please answer Yes or No . 1.5.7 276 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 . 1.5.8 277 Does the entity consider the ML/TF/PF technology (existing and new) in their risk assessment? Please answer Yes or No . 1.5.9 278 Does the entity consider Sanctions risk factors in their risk assessment? Please answer Yes or No . 1.5.10 279 Does the entity consider PF risk factors in their risk assessment? Please answer Yes or No . 1.5.11 280 Does the entity consider outsourcing risk factors in its risk assessment? Please answer Yes or No . 1.5.12 281 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 . 1.5.13 282 How often, in months, do you review High-Risk relationships/accounts? Please respond using the following: Never, More than 18 months, 7 12 months, 1 6 months. Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 47 of 53 1.5.14 283 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. 1.5.15 284 How often,

in months, do you review low-Risk relationships/accounts? Please respond using the following: Never, More than 18 months, 7 12 months, 1 6 months. 1.6.1 285 Does the entity rely on Group AML/CFT policies and procedures? Please answer Yes or No . 1.6.2 286 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 . 1.6.3 287 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 . 1.6.4 288 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 . 1.6.5 289 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 . 1.6.6 290 Does the entity have Board, or governing body, approved policies and procedures for establishing Source of Funds? Please answer Yes or No . 1.6.7 291 Does the entity have Board, or governing body, approved policies and procedures for employee screening? Please answer Yes or No . 1.6.8 292 Does the entity have Board or governing body approve policies and procedures for training of staff? Please answer Yes or No . 1.6.9 293 Does the entity have Board or governing body approved policies and procedures for ensuring confidential sharing and preservation of data within the group? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 48 of 53 1.6.10 294 Does the entity have policies and procedures on collecting due diligence on counterparties and business associates? Please answer Yes or No . 1.6.11 295 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 . 1.6.12 296 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. 1.7.1 297 Does the entity have a screening process? Please answer Yes or No . 1.7.2 298 Is the screening process manual, automated or a combination? Select which best applies: Manual, Automated, or Automated with Manual Checks. 1.7.3 299 Is the screening process fully or partially outsourced? Please select Fully or Partially . 1.7.4 300 When designated lists are updated, does the screening process reflect these updates within 24 hours? Please answer Yes or No . 1.7.5 301 Is sanctions monitoring done in real time or after the event? Select what applies: No process , After the event , or Real time . 1.7.6 302 Is the customer and counterparty database screened against the designated H.M. Treasury list? Please answer Yes or No . 1.7.7 303 Are procedures in place to ensure customers / counterparties are screened prior to payouts (remittance of funds)? Please answer Yes or No . 1.7.8 304 Does the entity have Asset Freeze procedures? Please answer Yes or No . 1.7.9 305 Have the assets of any customers identified as persons or entities designated by the United Nations Security Council or by the High Court as terrorists or for PF been frozen? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 49 of 53 1.7.10 306 Does the entity maintain a report of results of alerts, methodology of clearing alerts, and those positive matches resulting of sanction screening? Please answer Yes or No . 1.7.11 307 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 . 1.7.12 308 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 . 1.7.13 309 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 . 1.8.1 310 Does the entity have transaction monitoring policies and procedures developed commensurate to its operations? Please answer Yes or No . 1.8.2 311 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 . 1.8.3 312 Does the entity have in place an automated system for monitoring transactions for potential suspicion and reporting suspicious transactions? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 50 of 53 1.8.4 313 Is there a requirement for senior management approval before establishing high risk business relationships i.e. with PEPs? Please answer Yes or No . 1.8.5 314 Does the entity have EDD procedures? Please answer Yes or No . 1.8.6 315 Does the entity apply EDD on customers and counterparties based in higher-risk countries? Please answer Yes or No . 1.8.7 316 Where high risk clients are identified, did the entity conduct EDD measures for every transaction such customers carry out? Please answer Yes or No . 1.8.8 317 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. 1.9.1 318 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 . 1.9.2 319 Does the entity s policies and procedures identify the MLRO and how to make a filing to them? Please answer Yes or No . 1.9.3 320 Does the entity have policies and procedures for reporting to the FRA? Please answer Yes or No . 1.9.4 321 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. 1.9.5 322 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. 1.9.6 323 How many hours on average does it take to file a SAR to the FRA? Enter the number of hours (average) the entity takes to file a Suspicious Activity/Transaction Report to the FRA. 1.9.7 324 Has the entity been requested by law enforcement agencies or the courts to provide any information relating to its customers, business activities, directors or senior management? Please answer Yes or No . Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 51 of 53 1.9.8 325 Has the entity been penalized or received a warning for non-compliance, from the FRA? Please answer Yes or No . 1.9.9 326 Does the entity maintain a log identifying all internal SARs filed to the MLRO along with their status? Please answer Yes or No . 1.9.10 327 Does the entity maintain a log identifying all SARs filed to the FRA along with their status? Please answer Yes or No . 1.9.11 328 If the MLRO decides not to file a SAR to the FRA is the reason for not filing documented? Please answer Yes or No . 1.10.1 329 Does the

entity maintain Record Keeping Procedures? Please answer Yes or No . 1.10.2 330 How many years after the end of the business relationship are records retained? Enter the number of years 1.10.3 331 Are any records retained and accessible in the Cayman Islands? Please answer Yes or No . 1.10.4 332 How accessible and swiftly available are records for competent authorities - in hours? Enter the average time to comply in hours. 1.10.5 333 Does the entity maintain a declined business log? Please answer Yes or No . 1.10.6 334 Does the entity maintain records of its training programme? Please answer Yes or No . 1.11.1 335 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. 1.11.2 336 Was a risk assessment conducted on all outsourcing arrangements prior to initiation of the arrangement? Select which best applies: Yes , No or Not Applicable . 1.11.3 337 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. 1.11.4 338 In total, how many services does the entity outsource to either third parties, Enter the total number of services the entity outsources Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 52 of 53 or within its group or subsidiaries, during the reporting period? from either third parties, or within the entity s group or subsidiaries. 1.11.5 339 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. 1.11.6 340 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. 1.11.7 341 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. 1.11.8 342 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. 1.11.9 343 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. 1.11.10 344 If relevant, are there policies and procedures to ensure data protection restrictions would NOT delay access to data and documents? Select which best applies: Yes , No or Not Applicable . This question is only applicable if the entity outsources any activities. 1.11.11 345 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. Version: 1.3 AML Survey Completion Guide Mutual Fund Administrator Page 53 of 53 1.11.12 346 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. 1.12.1 347 Do you have any comments or feedback for this tab? Please answer Yes or No . 1.12.2 348 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.