



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: Securities & Registered Persons

Document version: 1.4 Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 2 of 63 Revision History: Effective Date Version Number Revision Description 12 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, and explanations. 31 May 2024 1.3 Updates to definitions, descriptions, and explanations. 24 June 2024 1.4 Update to section 1 of the completion guidance and question 89. Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 3 of 63 Contents 1 Introduction

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INTRODUCTION The Cayman Monetary Regulatory Authority International (the Authority) periodically undertakes sectoral ML/TF/PF and Sanctions risk assessments as part of its risk-based approach to AML/CFT supervision of regulated financial service providers (FSPs). In conducting sectoral ML/TF risk assessments and other related research, the Authority uses a software called STRIX to distribute the AML Survey to FSPs and further collect, analyse, model, and score ML/TF/PF and Sanctions risk data. FSPs are required to provide this data by completing the AML Survey Form and submit it through the Authority s web-based survey software, to the Anti-Money Laundering Division (the AMLD). The AML Survey Form is issued in accordance with section 16(1)(c) of the Securities Investment Business Act (2020 Revision). This Guide provides support to FSPs which carry out securities investment business for accessing, completion and submission of the AML Survey Securities and Registered Persons Form. 2 FORM INFORMATION The AML Survey Securities and Registered Persons Form is to be completed by each FSP holding a Securities Licence or Registration, who are commonly referred to as Entity for purposes of this form. The AML Survey Securities and Registered Persons Form is made up of two (2) sections for collecting AML risk data; 1) the AML Inherent Risks; and 2) AML Controls. 3 ACCESSING AND SUBMITTING THE AML SURVEY 3.1 ACCESS TO THE AML SURVEY Entities will receive an invitation to the web-based survey by using the current contact details of the Entity which the Authority has on record. Each member of the Entity who receives an invitation can activate their own account. The invitation is specific to the recipient address and cannot be shared or forwarded. Clicking on the link provided in the invitation will take the user to the account creation webpage. On successful account activation, the user will receive a confirmation . Logging in is then via clicking on the Return Home button available immediately after activating, 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: Registered Office, AMLCO, MLROs and other Principal Contacts. If an Entity is unsure of what their contact details are, they can contact the Authority at . 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 Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 5 of 63 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 Securities and Registered Persons Page 6 of 63
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: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 7 of 63
5. The user should then click on the Return To Home button. Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 8 of 63
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: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 9 of 63
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 Securities and Registered Persons Page 10 of 63

3.2 COMPLETING THE AML SURVEY FORM

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

they are required to submit a Request for Incomplete Submission to the Authority. Incomplete Submission Requests are to be submitted to detailing the following: i. Licence or Registration Name ii. Licenced or Registration Number iii. Date of Licence or Registration iv. List of current directors v. Number of Clients vi. Reason for requesting to make an Incomplete Submission.

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

3. The STRIX portal allows you to copy two-column lists from an Excel document and paste the data directly into the survey. Given that there are several questions in the survey that require country breakdown details, the ability to bulk paste into STRIX will ease the burden of inputting individual responses. To upload bulk entries for those country breakdown questions, please do the following: Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 11 of 63

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. Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 12 of 63

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

AML Inherent Risk Factors Descriptions Terms/Abbreviations Definition/Meaning AMLRs Anti-Money Laundering Regulations, (2023 Revision), as amended. AMLCO Anti-Money Laundering Compliance Officer BO Beneficial Owner (or UBO) (as defined in Regulation 2 of the Anti-Money Laundering Regulations (as revised)) means the natural person who ultimately owns or controls the customer or on whose behalf a transaction or activity is being

conducted and includes but is not restricted to (a) in the case of a legal person other than a company whose securities are listed on a recognized stock exchange, a natural person who ultimately owns or controls, whether through direct or indirect ownership or control, 10% or more of the shares or voting rights in the legal person. (b) in the case of any legal person, a natural person who otherwise exercises ultimate effective control over the management of the legal person. (c) in the case of a legal arrangement, the trustee or other person who exercises ultimate effective control over the legal arrangement. Client / Customer A person who is in a business relationship, or is carrying out a one-off transaction, with a person who is carrying out relevant financial business in the Islands. This includes both Natural Persons and Legal Persons and Arrangement Clients. Corporate Entity A corporate body constituted under the Laws of the Islands, or any other jurisdiction, which is formed specifically to perform activities, such as running an enterprise or holding assets. Currency used for the Survey United States Dollars (US\$). Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 13 of 63 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 Securities licence or the Registered Person registration that is responding to this survey. F2F The engagement of a client directly, with the natural person physically present. The engagement will not be via , , online, etc. Fintech Service A service that uses innovative technology to improve, change or enhance financial services but is not a virtual asset service. Foundation This definition refers to Cayman Islands foundation companies that are governed by the Companies Act (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. Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 14 of 63 High Value Dealers Any business or sole trader that accepts or makes high value cash payments of US\$15,000 or more (or equivalent in any currency) in exchange for goods. HNWI A high net worth individuals (HNWI) is: (i) an individual whose net worth is at least CI\$800,000 (approx. US\$1,000,000) or its equivalent in any other currency; or (ii) any person that has total assets of not less than CI\$4,000,000 (approx. US\$5,000,000) or its equivalent in any other currency. Import and Export Business A company that facilitates trades of goods and commodities between domestic and foreign companies such as a company that buys goods internationally and ships them in for domestic purchases and/or exports goods and services produced in the home country for sale to other markets. Individual A Natural Person and not a Legal Person and Arrangement. Legal Arrangement A trust or partnership, or other entity created between

parties which lacks separate legal personality. Legal Person Legal person means 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. Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 15 of 63 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 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; 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 Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 16 of 63 marriage or similar (civil) forms of partnership. (ii) Close associates to PEPs: individuals who are closely connected to PEP, either socially or professionally. Reporting Period January 1 through December 31, 2023, and future calendar years thereafter. Source of Funds The origin of the assets that will be used to form and maintain the business relationship. A client can have multiple sources of funds which should be established and recorded separately. However, multiple sources of funds that were used when forming the business relationship and monitoring the ongoing activity should be counted together. Take this into account when answering questions relating to the Nature of Business Source of Funding. Special Economic Zone Business Any type of business authorised to be carried on in a special economic zone pursuant to any legislation enforced in the Islands. SIBA Securities Investment Business Act (2020 Revision), as amended. Signatories Signatories are those persons authorised to act on behalf of a client, for example, BOs, Directors, or other Third Parties. Targeted Financial Sanctions (TSF) Includes asset freezing and restrictions and directions to prevent funds or other assets from

being made available, directly, or indirectly, to or for the benefit of persons and entities designated by the Office of Financial Sanctions Implementation, HM Treasury (OFSI).

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

Trust A legal arrangement which distinguishes between the legal and beneficial ownership of property. Legal ownership is transferred to a trustee who manages

Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 17 of 63 and administers the property for the benefit of the beneficiaries or for the furtherance of certain purposes.

Ultra HNWIs 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 Asset 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. This is to be an aggregate of all transactions conducted for clients/customers in this category for the reporting period. (I.E. If 1 order to trade a security at a specific price is filled over several lots, it is to be counted as a single transaction.)

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.
1.1.2	2	Total Clients during the reporting period Enter the total number of clients the entity had during the reporting period.
1.1.3	3	Total Transactions. Enter the total number of all transactions conducted for clients during the reporting period.
1.1.4	4	Total Value of Client Assets Held Management. Enter the total Value of Assets Under Management (AUM) for clients, as at the end of the reporting period. If an entity does not have client AUM, a 0 value should be used.
1.1.5	5	Clients / customers that are Legal Persons and Arrangements, broken down by country of incorporation of the client. Enter the total number of clients that are legal persons and arrangements broken down by their country of incorporation, or formation, at the end of the reporting period. Examples of legal persons and arrangements include, but are not limited to: Corporate entities, Foundations and Trusts. If an entity does not have such clients, a 0 value should be used.
1.1.6	6	Number of Transactions - Legal Persons and Arrangements. Enter the total number of transactions that were conducted by customers who are legal person and arrangements, during the reporting period. Examples of legal persons and arrangements include, but are not limited to, Corporate entities, Foundation and Trusts. If an entity did not conduct such transactions, a 0 value should be used.
1.1.7	7	Value of Assets Held Under Management for client that are Legal Persons and Arrangements. Enter the total Value of Assets Under Management (AUM) for clients who are legal persons or arrangements, as at the end of the reporting period. Examples of legal persons and arrangements include, but are not limited

to, Corporate entities, Foundations and Trusts. If an entity does not manage assets for these clients, a 0 value should be used.

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.

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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, broken down by nationality of the BO, as at the end of the review 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.

1.2.2 12 Does the entity have any clients who are Legal Arrangements? Answer Yes or No

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 Does the entity have any clients which have BOs who are HNWI? Please answer Yes or No . This category is specific to clients who are Legal Persons and Arrangements. Examples include, but not limited to, instances where a BO of a Company or Settlor of a Trust is a HNWI.

1.2.6 16 Number of Clients which have BOs who are HNWIs. Enter the total number of clients that have BOs who are HNWIs. HNWI is specific to those persons whose net worth is at least C\$800,000 (approx. US\$1,000,000) and/or those that have assets valued at least C\$4,000,000 (approx. US\$5,000,000)

1.2.7 17 Does the entity have any clients which have BOs who are Ultra HNWI? Please answer Yes or No . UHNWI is specific to those persons whose net worth is equal to or greater than \$30,000,000.

1.2.8 18 Number of Clients which have BOs who are Ultra HNWIs. Enter the total number of clients who have BOs who are Ultra HNWIs.

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1.2.9 19 Does the entity have any clients who are Legal Persons or Arrangements that have BOs who are PEPs? Please answer Yes or No .

1.2.10 20 Number of BOs of clients who are Legal Persons or Arrangements which are also PEPs. Enter the total number of clients who are Legal Person and Arrangements that have BOs who are PEPs, as at the end of the reporting period.

1.2.11 21 Does the entity have any clients which have Nominees acting on behalf of a BO (inc. any Nominees within the ownership structure)? Please answer Yes or No .

1.2.12 22 Number of clients which have Nominees appointed acting on behalf of a BO, or a Nominee within the ownership structure, broken down by nationality of the BO. Enter the total number of clients which have nominees acting on behalf of BOs, or within its ownership structure, categorised by nationality of the BO. This category is specific to clients who are legal persons and arrangements.

1.3.1 23 Number of clients which have a nominee appointed on behalf of a director, broken down by country of nationality of the director. Enter the total number of clients which have a nominee director as at the end of the review period, broken down by country of nationality of the director.

1.3.2 24 Number of

clients that have a nominee appointed on behalf of a director, broken down by country of nationality of the nominee. Enter the total number of clients which have a nominee director as at the end of the review period, broken down by country of nationality of the nominee.

1.3.3 25 Number of directors and/or senior management of clients who are PEPs. Enter the total number of clients who have directors and/or senior management who are PEPs as at the end of the reporting period.

1.3.4 26 Number of directors and/or senior management of clients who are High Net Worth Individuals. Enter the number of directors and/or senior management of the clients who are HNWI, as at the end of the reporting period.

1.3.5 27 Number of directors and/or senior management of clients who are Ultra High Net Worth Individuals. Enter the number of directors and/or senior management of the clients who are Ultra HNWI as at the end of the reporting period. Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 21 of 63

1.3.6 28 Number of directors and/or senior management of clients who are PEPs & High Net Worth Individuals. Enter the number of directors and/or senior management of the clients who are both PEPs and HNWI, as at the end of the reporting period.

1.4.1 29 Does the entity have any clients that are Gov / Pub Sector? Please answer Yes or No .

1.4.2 30 Gov / Pub Sector - Number of Clients, broken down by country of the government jurisdiction. Enter the number of clients that the entity has, as at the end of the reporting period, that are a government or public sector, broken down by government jurisdiction.

1.4.3 31 Gov / Pub Sector - Number of Transactions. Enter the number of transactions conducted by clients that are government or public sector during the reporting period.

1.4.4 32 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 33 Gov / Pub Sector - Value of Assets Under Management. Enter the Value of Assets Under Management of the clients that are Government or Public sector, as at the end of the reporting period.

1.4.6 34 Does the entity have any clients that are NPOs? Please answer Yes or No .

1.4.7 35 NPO - Number of Clients, broken down by country of incorporation of the client. Enter the number of clients who are NPOs, broken down by country of incorporation of the client, as at the end of the reporting period.

1.4.8 36 NPO - Number of Transactions. Enter the number of transactions conducted by clients that are NPOs during the reporting period.

1.4.9 37 NPO Value of Transactions. Enter the value of transactions processed for clients that are NPOs, during the reporting period.

1.4.10 38 NPOs - Value of Assets Under Management. Enter the Value of Assets Under Management of clients that are NPOs, as at the end of the reporting period. Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 22 of 63

1.4.11 39 Does the entity have any clients that are Foundations? Please answer Yes or No .

1.4.12 40 Foundations - Number of Clients, broken down by country of establishment of the client. Enter the number of Foundation clients the entity has, broken down by the country of establishment of the client, as at the end of the reporting period.

1.4.13 41 Foundations - Number of Transactions. Enter the number of transactions conducted by clients that are a Foundation, during the reporting period.

1.4.14 42 Foundations Value of Transactions. Enter the value of transactions processed for clients that are Foundations, during the reporting period.

1.4.15 43 Foundations - Value of Assets Under Management. Enter the Value of Assets Under Management of clients that are a Foundation, as at the end of the reporting period.

1.4.16 44 Does the entity have any clients that are trusts? Please answer Yes or No .

1.4.17 45 Trusts - Number of Clients, broken down by country of registration of the Trust. Enter the number of Trust clients the entity has, broken down by country of registration of the trust, as at the end of the reporting period.

1.4.18 46 Trusts - Number of Transactions. Enter the number of transactions conducted by clients that are Trusts, during the reporting period. 1.4.19 47 Trusts Value of Transactions. Enter the Value of transactions conducted by clients that are Trust, during the reporting period. 1.4.20 48 Trusts - Value of Assets Under Management. Enter the Value of Assets Under Management of clients that are Trusts, as at the end of the reporting period. 1.4.21 49 Does the entity have any clients that are Segregated Portfolio Companies? Please answer Yes or No . Note that one client can fall under multiple categories of structure. 1.4.22 50 Segregated Portfolio Companies - Number of Clients. Enter the number of clients the entity has that are a Segregated Portfolio Company, as at the end of the reporting period. Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 23 of 63 1.4.23 51 Segregated Portfolio Companies - Number of Transactions. Enter the number of transactions conducted by clients that are a Segregated Portfolio Company, during the reporting period. 1.4.24 52 Segregated Portfolio Companies - Value of Transactions Enter the number of transactions conducted by clients that are a Segregated Portfolio Company, during the reporting period. 1.4.25 53 Segregated Portfolio Companies - Value of Assets Under Management. Enter the Value of Assets Under Management of clients that are a Segregated Portfolio Company, as at the end of the reporting period. 1.4.26 54 Does the entity have any clients that operate from Special Economic Zone? Please answer Yes or No . Note that one client can fall under multiple categories of structure. 1.4.27 55 Special Economic Zone - Number of Clients. Enter the number of clients the entity has, that are registered / operate in a Special Economic Zone, as at the end of reporting period. 1.4.28 56 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. 1.4.29 57 Special Economic Zone - Value of Transactions. Enter the value of transactions conducted by clients, that are registered / operate in a Special Economic Zone, during the reporting period. 1.4.30 58 Special Economic Zone - Value of Assets Under Management. Enter the Value of Assets Under Management of clients that are registered / operate in a Special Economic Zone, as at the end of the reporting period. 1.4.31 59 Does the entity have any clients that are Funds / Collective Investment Vehicles? Please answer Yes or No . Note that one client can fall under multiple categories of structure. 1.4.32 60 Funds / Collective Investment Vehicles - Number of Clients. Enter the number of clients the entity has, that are Funds / Collective Investment Vehicles as at the end of reporting period. 1.4.33 61 Funds / Collective Investment Vehicles - Number of Transactions. Enter the number of transactions conducted by clients that are Funds / Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 24 of 63 Collective Investment Vehicles, during the reporting period. 1.4.34 62 Funds/Collective Investment Vehicles Value of Transactions. Enter the value of transactions conducted by clients that are Funds / Collective Investment Vehicles, during the reporting period. 1.4.35 63 Funds / Collective Investment Vehicles - Value of Assets Under Management. Enter the Value of Assets Under Management of clients that are Funds / Collective Investment Vehicles, as at the end of the reporting period. 1.5.1 64 Does the entity have any Natural Person clients? Please answer Yes or No . This question does not apply to clients who are Legal Persons or Arrangements. 1.5.2 65 Clients / customers that are Natural Persons, broken down by nationality of the client. Enter the number of clients that are natural persons, broken down by their nationality, at the end of the reporting period. If an entity does not have such clients, a 0 value should be used. Note: This category does not include clients/ customers that are Legal Persons and

Arrangements. 1.5.3 66 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 67 Natural Person Clients Total Transactions. 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. Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 25 of 63 Note: This category does not include clients / customers that are Legal Persons and Arrangements. 1.5.5 68 Value of Assets Held Under Management for clients who are Natural Persons. Enter the value of assets under management for clients that are natural persons, at the end of the reporting period. 1.5.6 69 Does the entity have any Natural Person 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 70 Number of Natural Person Clients who are PEPs, broken down by nationality of the client. Enter the total number of Natural Person clients that are PEPs, broken down by the nationality of the client, as at the end of the reporting period. This question does not apply to clients who are Legal Persons or Arrangements. 1.5.8 71 Natural Person Clients - PEPs - Number of Transactions. Enter the number of transactions conducted by Natural Person clients that are PEPs, during the reporting period. 1.5.9 72 Natural Person Clients - PEPs - Value of Transactions. Enter the value of transactions conducted by Natural Person clients who are PEPs, during the reporting period. 1.5.10 73 Natural Person Clients - PEPs - Value of Assets Under Management. Enter the Value of Assets Under Management of Natural Person clients who are PEPs, at the end of the reporting period. 1.5.11 74 Does the entity have any Natural Person Clients that are HNWI? Please answer Yes or No . 1.5.12 75 Number of Natural Person Clients who are HNWI. Enter the number of Natural Person clients the entity has that are HNWI. 1.5.13 76 Natural Person Clients - HNWI - Number of Transactions. Enter the number of transactions conducted by Natural Person clients that are HNWI, during the reporting period. 1.5.14 77 Natural Person Clients - HNWI - Value of Transactions. Enter the value of transactions conducted by Natural Person clients that are HNWI, during the reporting period. 1.5.15 78 Natural Person Clients - HNWI - Value of Assets Under Management. Enter the Value of Assets Under Management of Natural Person clients Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 26 of 63 that are HNWI, as at the end of the reporting period. 1.5.16 79 Does the entity have any Natural Person clients that are Ultra HNWI? Please answer Yes or No . 1.5.17 80 Number of Natural Person Clients who are Ultra HNWI. Enter the number of Natural Person clients that are Ultra HNWI, at the end of the reporting period. 1.5.18 81 Natural Person Clients Ultra HNWI - Number of Transactions. Enter the number of transactions conducted by Natural Person clients that are Ultra HNWI, during the reporting period. 1.5.19 82 Natural Person Clients Ultra HNWI - Value of Transactions. Enter the value of transactions conducted by Natural Person clients that are Ultra HNWI, during the reporting period. 1.5.20 83 Natural Person Clients Ultra HNWI - Value of Assets Under Management. Enter the Value of Assets Under Management of Natural Person clients that are Ultra HNWI, at the end of the reporting period. 1.5.21 84 Does the entity have any Natural Person clients that are PEPs and HNWI? Please answer Yes or

No . Include all PEPs, both HNWI and Ultra HNWIs. 1.5.22 85 Number of Natural Person Clients who are PEPs and HNWIs. Enter the number of Natural Person clients that are both PEPs and HNWIs. Include all PEPs, both HNWI and Ultra HNWIs. 1.5.23 86 Natural Person Clients - PEPs and HNWIs - Number of Transactions. Enter the number of transactions conducted by Natural Person clients that are both PEPs and HNWIs, during the reporting period. Include all PEPs, both HNWI and Ultra HNWIs. 1.5.24 87 Natural Persons - PEPs & HNWIs - Value of Transactions. Enter the value of transactions conducted by Natural Person clients that are both PEPs and Ultra HNWIs, during the reporting period. Include all PEPs, both HNWI and Ultra HNWIs. 1.5.25 88 Natural Persons - PEPs & HNWIs - Value of Assets Under Management. Enter the Value of Assets Under Management of Natural Person clients that are both PEPs and HNWIs, at the end of the reporting period. Include all PEPs, both HNWI and Ultra HNWIs. Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 27 of 63 1.6.1 89 Nature of Business / Source of Funding: Enter the total number of clients whose source of funding falls within the list of sectors below: Banking Institutions Other Financial regulated Business* Financial Leasing Money Lending Accountants Fintech *excluding MSBs, Virtual Asset Products and Services, and TCSPs. Provide the total number of clients whose source of funding falls within the list of sectors. 1.6.2 90 Does the entity have any clients whose source of funding is from the Banking sector (excluding MSBs)? Please answer Yes or No . 1.6.3 91 Banking Institutions (excluding MSBs) - Number of Clients. Enter the number of clients the entity has whose source of funding is from the banking sector. 1.6.4 92 Does the entity have any clients whose source of funding is from the financial services sector, other than banking, VASPs, MSBs and TCSPs? Please answer Yes or No . 1.6.5 93 Other Financial Regulated Business - Number of Clients. Enter the number of clients the entity has, whose source of funding is from the financial sector (excluding Banking, VASPs, MSBs and TCSPs). 1.6.6 94 Does the entity have any clients whose source of funding is from Financial Leasing operations? Please answer Yes or No . 1.6.7 95 Financial Leasing- Number of Clients. Enter the number of clients the entity has, whose source of funding is from Financial Leasing operations. 1.6.8 96 Does the entity have any clients whose source of funding is from Money Lending operations? Please answer Yes or No . Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 28 of 63 1.6.9 97 Money Lending - Number of Clients. Enter the number of clients the entity has whose source of funding is from Money Lending operations. 1.6.10 98 Does the entity have any clients whose source of funding is through being an Accountant, (including any of: Audit, Assurance, Bookkeeping, Insolvency)? Please answer Yes or No . 1.6.11 99 Accountants (Audit / Assurance / Bookkeeping / Insolvency) - Number of Clients. Enter the number of clients the entity has whose source of funding is through being an Accountant, (including any of: Audit, Assurance, Bookkeeping, and Insolvency). 1.6.12 100 Does the entity have any clients whose source of funding is from the Fintech industry? Please answer Yes or No . 1.6.13 101 Fintech - Number of Clients. Enter the number of clients the entity has whose source of funding is from the Fintech industry. 1.6.14 102 Nature of Business / Source of Funding: Enter the total number of clients whose source of funding falls within the list of sectors below. Legal Practitioners Dealers in Precious Metals and Stones Money Services Business (MSBs) Virtual Asset Products and Services High Value Dealers Import/Export Industry Shipping and Transport of Goods Provide the total number of clients whose source of funding falls within the list of sectors. 1.6.15 103 Does the entity have any clients whose source of funds is derived from being a Legal

Practitioners? Please answer Yes or No . Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 29 of 63 1.6.16 104 Legal Practitioners - Number of clients. Enter the number of clients the entity has whose source of funding is derived from being a Legal Practitioner. 1.6.17 105 Does the entity have any clients whose source of funds is derived from Dealers in Precious Metals and Stones operations? Please answer Yes or No . 1.6.18 106 Dealers in Precious Metals and Stones - Number of Clients. Enter the number of clients the entity has whose source of funds is derived from Dealers in Precious Metals and Stones operations. 1.6.19 107 Does the entity have any clients whose source of funds are derived from Money Services Business operations? Please answer Yes or No . 1.6.20 108 Money Services Business - Number of Clients. Enter the number of clients whose source of funds are derived from Money Services Business operations. 1.6.21 109 Does the entity have any clients whose source of funds is derived from the virtual asset sector (products, services, investments)? Please answer Yes or No . 1.6.22 110 Virtual Asset Products and Services - Number of Clients. Enter the number of clients the entity has whose source of funds is derived from the virtual asset sector (products, services, or investments). 1.6.23 111 Does the entity have any clients whose source of funds is derived through High Value Dealer operations? Please answer Yes or No . 1.6.24 112 High Value Dealers - Number of Clients. Enter the number of clients whose source of funds is derived from High Value Dealer operations. 1.6.25 113 Does the entity have any clients whose source of funds is derived from TCSP operations? Please answer Yes or No . Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 30 of 63 1.6.26 114 TCSPs - Number of Clients. Enter the number of clients the entity has whose source of funds is derived from TCSP operations. 1.6.27 115 Does the entity have any clients whose source of funds is derived from the Import / Export Industry? Please answer Yes or No . 1.6.28 116 Import / Export - Number of Clients. Enter the number of clients the entity has, that are legal persons or arrangements operating in the Import / Export business, and natural persons that are employed the Import / Export industry. 1.6.29 117 Does the entity have any clients whose source of funding is derived from the Shipping and Transport of Goods industry? Please answer Yes or No . 1.6.30 118 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. 1.6.31 119 Nature of Business / Source of Funding: Enter the total number of clients whose source of funding falls within the list of sectors below: Real Estate Agents/Brokers Gambling Business Adult Entertainment Industry Defence Industry Oil and Gas Industry Mining Construction / Development Retail / Restaurant Cannabis Industry Provide the total number of clients whose source of funding falls within the list of sectors. 1.6.32 120 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 . Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 31 of 63 1.6.33 121 Real Estate Agents / Brokers - Number of Clients. Enter the number of clients the entity has whose source of funds is derived through the Real Estate industry (Agents / Brokers / sellers). 1.6.34 122 Does the entity have any clients whose source of funds is derived through the Gambling industry (including online gambling)? Please answer Yes or No . 1.6.35 123 Gambling business (including online gambling) - Number of Clients. Enter the number of clients the entity has whose source of funds is derived through the Gambling industry (including online gambling). 1.6.36 124 Does the entity have any clients whose source of funds is derived from the adult entertainment industry? Please answer Yes or

No . 1.6.37 125 Adult Entertainment - Number of Clients. Enter the number of clients the entity has whose source of funds is derived from the Adult Entertainment Industry. 1.6.38 126 Does the entity have any clients whose source of funds are derived from the Defence Industry? Please answer Yes or No . 1.6.39 127 Defence Industry - Number of Clients. Enter the number of clients the entity has whose source of funds is derived from the Defence industry. 1.6.40 1280 Does the entity have any clients whose source of funds are derived from operating in the Oil and Gas Industry? Please answer Yes or No . 1.6.41 129 Oil and Gas Industry - Number of Clients. Enter the number of clients the entity has whose source of funds is derived from operating in the Oil and Gas industry. 1.6.42 130 Does the entity have any clients whose source of funds is derived from the Mining Industry? Please answer Yes or No . Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 32 of 63 1.6.43 131 Mining Industry - Number of Clients. Enter the number of clients the entity has whose source of funds is derived from the Mining Industry. 1.6.44 132 Does the entity have any clients whose source of funds are derived through operating in the Construction / Development industry? Please answer Yes or No . 1.6.45 133 Construction / Development - Number of Clients. Enter the number of clients the entity has whose source of funds is derived from operating in the Construction / Development industry. 1.6.46 134 Does the entity have any clients whose source of funds are derived from operating in the Retail & Restaurant Business? Please answer Yes or No . 1.6.47 135 Retail & Restaurant Business - Number of Clients. Enter the number of clients the entity has whose source of funding is derived in the Retail & Restaurant Business. 1.6.48 136 Does the entity have any clients whose source of funds are derived through Cannabis Production & Distribution operations? Please answer Yes or No . 1.6.49 137 Cannabis Production & Distribution - Number of Clients. Enter the number of clients whose source of funds is derived from Cannabis Production & Distribution operations. 1.6.50 138 Does the entity have any clients whose source of funds is Unknown to the entity? Please answer Yes or No . 1.6.51 139 Unknown Businesses and Professions - Number of Clients. Enter the number of clients the entity has whose source of funds is Unknown to the entity. Unknown business and profession are where the entity does not know, and was not provided with, and was unable to verify the nature of business or profession (source of funds) of the client. Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 33 of 63 1.6.52 140 Does the entity have any clients where the nature of business / Source of Funding is not listed in a category above? Please answer Yes or No . 1.6.53 141 Other - Not mentioned above - Number of Clients. Enter the number of clients the entity has whose source of funds is known businesses however not mentioned above. 1.7.1 142 Source of Funds Value of Client Assets. Enter the total value of client assets under management 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 . 1.7.2 143 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). 1.7.3 144 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. 1.7.4 145

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.

1.7.5 146 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.

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1.7.6 147 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 Accountant operations (Audit / Assurance / Bookkeeping / Insolvency).

1.7.7 148 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.

1.7.8 149 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 .

1.7.9 150 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.

1.7.10 151 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.

1.7.11 152 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.

1.7.12 153 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).

1.7.13 154 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.

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1.7.14 155 TCSPs - Value of Client Assets. Enter the value of client assets under management of clients whose source of funds is derived from TCSP operations.

1.7.15 156 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.

1.7.16 157 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.

1.7.17 158 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 .

1.7.18 159 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).

1.7.19 160 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.

1.7.20 161 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. 1.7.21 162 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. 1.7.22 163 Oil and Gas 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 Oil and Gas industry. 1.7.23 164 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. 1.7.24 165 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. 1.7.25 166 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. 1.7.26 167 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. 1.7.27 168 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. 1.7.28 169 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. 1.8.1 170 Does the entity have any comments or feedback for this tab? Please answer Yes or No . 1.8.2 171 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. 2.1.1 172 Does the entity provide products or services for shares trading (listed or unlisted)? Please answer Yes or No . 2.1.2 173 Shares Trading - Number of Clients. Enter the number of clients the entity provides shares trading services and holds shares, during the reporting period. 2.1.3 174 Shares Trading - Value of Transactions. Enter the Value of Transactions of clients that the entity provides shares trading services and holds shares, during the reporting period. 2.1.4 175 Does the entity provide any products related to Instruments of indebtedness? Please answer Yes or No . 2.1.5 176 Instruments of indebtedness - Number of Clients. Enter the number of clients the entity provides products related to instruments of indebtedness, during the reporting period. 2.1.6 177 Instruments of Indebtedness - Value of Transactions. Enter the Value of Transactions for clients that the entity provides products related to instruments of indebtedness, during the reporting period. 2.1.7 178 Does the entity provide any products related to Securities Traded - Securities Entitlements? Please answer Yes or No . 2.1.8 179 Securities Traded - Securities Entitlements- Number of Clients. Enter the number of clients to whom the entity provides securities trading services related to securities entitlements, during the reporting period. 2.1.9 180 Securities Traded - Securities Entitlements - Value of Transactions Enter the Value of Transactions of clients that the entity provides securities trading products related to securities entitlements, for the reporting period. 2.1.10 181 Does the entity provide any products related to Certificates? Please answer Yes or No . 2.1.11 182 Securities Traded Certificates - Number of Clients. Enter the number of clients the entity provides securities trading services related to certificates, during the reporting period. 2.1.12 183 Securities Traded - Certificates - Value of

Transactions. Enter the Value of Transactions of clients the entity provides securities trading
Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 38 of
63 products related to certificates for the reporting period. 2.1.13 184 Does the entity
provide any products related to Options? Please answer Yes or No . 2.1.14 185
Securities Traded - Options Number of Clients. Enter the number of clients the entity
provides securities trading services related to options to, for the reporting period. 2.1.15 186
Securities Traded - Options Value of Transactions. Enter the Value of Transactions for clients
the entity provides securities trading products related to options, for the reporting period.
2.1.16 187 Does the entity provide any products related to Futures? Please answer Yes or
No . 2.1.17 188 Securities Traded - Futures - Number of Clients. Enter the number of clients
the entity provides securities trading services related to futures to, during the reporting
period. 2.1.18 189 Securities Traded - Futures - Value of Transactions. Enter the Value of
Transactions for clients the entity provides securities trading products related to futures,
during the reporting period. 2.1.19 190 Does the entity provide any products related to
Forward Contracts? Please answer Yes or No . 2.1.20 191 Securities Traded - Forward
Contracts - Number of Clients. Enter the number of clients the entity provides securities
trading services related to forward contracts, during the reporting period. 2.1.21 192
Securities Traded - Forward Contracts - Value of Transactions. Enter the Value of
Transactions of clients the entity provides securities trading products related to forward
contracts, during the reporting period. 2.1.22 193 Does the entity provide any products
related to Contracts for Differences? Please answer Yes or No . 2.1.23 194 Securities
Traded - Contracts for Differences- Number of Clients. Enter the number of clients the entity
provides securities trading services related to contracts for differences, during the reporting
period. Version: 1.4 AML Survey Completion Guide Securities and Registered Persons
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Transactions. Enter the Value of Transactions for clients the entity provides securities trading
products related to contracts for differences, during the reporting period. 2.1.25 196 Does
the entity provide any products related to Securities Traded - Virtual Assets? Please
answer Yes or No . 2.1.26 197 Securities Traded - Virtual Assets - Number of Clients.
Enter the number of clients the entity provides securities trading services related to virtual
assets to, during the reporting period. 2.1.27 198 Securities Traded - Virtual Assets - Value
of Transactions. Enter the Value of Transactions for clients the entity provides securities
trading products related to virtual assets, during the reporting period. 2.1.28 199 Does the
entity provide any Products related to Securities Traded - Penny / Micro Stocks? Please
answer Yes or No . 2.1.29 200 Securities Traded - Penny / micro stocks - Number of
Clients. Enter the number of clients the entity provides securities trading services related to
penny / micro stocks, during the reporting period. 2.1.30 201 Securities Traded - Penny /
Micro Stocks - Value of Transactions. Enter the Value of Transactions for clients that the
entity provides securities trading products related to penny / micro stocks, during the
reporting period. 2.1.31 202 Does the entity provide any other products related to
securities not mentioned above? Please answer Yes or No . 2.1.32 203 Securities Traded
- Other Securities - Number of Clients. Enter the number of clients the entity provides
securities trading services not mentioned above, during the reporting period. 2.1.33 204
Please indicate the other Securities Products not captured above. List the other Securities
Products not mentioned above. 2.2.1 205 Does the entity provide custodial or depository
services? Please answer Yes or No . Version: 1.4 AML Survey Completion Guide
Securities and Registered Persons Page 40 of 63 2.2.2 206 Custodian / Depository -

Number of Clients. Enter the number of clients the entity provides Custodial Services to, during the reporting year. 2.2.3 207 Custodian / Depository - Value of Client Assets. Enter the value of client assets at end of the reporting year. 2.2.4 208 Custodian / Depository - Value of Transactions for the reporting period. Enter the Value of Transactions for clients the entity provides Custodial / depository services to during the reporting period. 2.2.5 209 Does the entity service Clients as Broker Dealer? Please answer Yes or No . 2.2.6 210 Broker Dealer - Number of Clients. Enter the number of clients the entity provides Broker Dealer services, during the reporting period. 2.2.7 211 Broker Dealer - Value of Transactions for the reporting period. Enter the Value of Transactions for the reporting period, for clients the entity provides Broker Dealer services to. 2.2.8 212 Does the entity service Clients as Market Maker? Please answer Yes or No . 2.2.9 213 Market Maker - Number of Clients. Enter the number of clients the entity provided market maker services to during the reporting period. 2.2.10 214 Market Maker - Value of Transactions for the reporting period. Enter the Value of Transactions for clients the entity provides market maker services, during the reporting period. 2.2.11 215 Does the entity service Clients as Securities Advisor? Please answer Yes or No . 2.2.12 216 Securities Advisor - Number of Clients. Enter the number of clients to whom the entity provides securities advisor services, during the reporting period. 2.2.13 217 Securities Advisor - Value of Transactions for the reporting period. Enter the Value of Transactions for clients the entity provides securities advisor services, during the reporting period. 2.2.14 218 Does the entity service Clients as Securities Arranger? Please answer Yes or No . 2.2.15 219 Securities Arranger - Number of Clients. Enter the number of clients the entity provides securities arranger services to, during the reporting period. Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 41 of 63 2.2.16 220 Securities Arranger - Value of Transactions for the reporting period. Enter the Value of Transactions for clients the entity provides securities arranger services to, during the reporting period. 2.2.17 221 Does the entity service Clients as Securities Manager? Please answer Yes or No . 2.2.18 222 Securities Manager - Number of Clients. Enter the number of clients the entity provides Securities Manager services to, during the reporting period. 2.2.19 223 Securities Manager - Value of Transactions for the reporting period. Enter the Value of Transactions for clients the entity provides Securities Manager services to, during the reporting period. 2.2.20 224 Does the entity have any clients that are Administered Funds? Please answer Yes or No . 2.2.21 225 Administered Fund Clients - Number of Clients. Enter the number of clients the entity has who are administered funds, during the reporting period. 2.2.22 226 Administered Fund Clients - Value of Transactions for the reporting period. Enter the Value of Transactions for clients who are administered funds during the reporting period. 2.3.1 227 Does the entity facilitate payments to / from Clients in the form of Physical Cash? Please answer Yes or No . 2.3.2 228 Physical Cash - Number of Clients. Enter the number of clients where payments were made by, for or on behalf of clients, in the form of Physical Cash, during the reporting period. 2.3.3 229 Physical Cash - Number of Transactions. Enter the number of Physical Cash transactions conducted by, for or on behalf of clients, during the reporting period. 2.3.4 230 Physical Cash - Value of Funds Transacted. Enter the value of the Physical Cash transactions conducted by, for or on behalf of clients, during the reporting period. Payments include those between the entity and the client and those conducted on behalf of the entity. Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 42 of 63 2.3.5 231 Does the entity facilitate payments to / from Clients in the form of Virtual Currency? Please answer Yes or No . 2.3.6 232 Virtual Currency - Number

of Clients. Enter the number of clients where payments were made by, for or on behalf of clients, in the form of Virtual Currency, during the reporting period. 2.3.7 233 Virtual Currencies - Number of Transactions. Enter the number of virtual currency transactions clients conducted by, for or on behalf of clients, during the reporting period. 2.3.8 234 Virtual Currencies - Value of Funds Transferred. Enter the value of the virtual currency transactions conducted by, for or on behalf of clients, during the reporting period. 2.3.9 235 Does the entity facilitate payments to / from Clients via Third Parties? Please answer Yes or No . 2.3.10 236 Third Parties - Number of Clients. Enter the number of clients which conducted payments via Third Parties during the reporting period, which were conducted by, for or on behalf of clients. Payments via third party means that the payment was paid to a third party not associated with the business relationship or transaction. 2.3.11 237 Third Parties - Number of Transactions. Enter the number of Third Party transactions conducted by, for or on behalf of, clients during the reporting period. 2.3.12 238 Third Parties - Value of Funds Transferred. Enter the value of the Third-Party transactions conducted by, for or on behalf of, clients during the reporting period. 2.3.13 239 Does the entity facilitate payments to / from Clients via Credit Card? Please answer Yes or No . 2.3.14 240 Credit Card Payments - Number of Clients Enter the number of clients which had payments via credit card, conducted by, for or on behalf of the client, during the reporting period. 2.3.15 241 Credit Card Payments - Number of Transactions. Enter the number of credit card transactions conducted by, for or on behalf of the client, during the reporting period. 2.3.16 242 Credit Card Payments - Value of Funds Transferred. Enter the value of credit card transactions, conducted by, for or on behalf of, clients, during the reporting period. 2.3.17 243 Does the entity facilitate payments to / from Clients in the form of Wire Transfers? Please answer Yes or No . This excludes internal bank transfers. 2.3.18 244 Wire Transfers - Number of Clients. Enter the number of clients which had payments via wire transfers conducted by, for or on behalf of clients, during the reporting period. 2.3.19 245 Wire Transfers - Number of Transactions. Enter the number of wire transfer transactions that were conducted by, for or on behalf of clients, during the reporting period. 2.3.20 246 Wire Transfers - Value of Funds Transferred. Enter the value of funds wire transferred by clients during the reporting period. 2.3.21 247 Does the entity facilitate payments of Clients in the form of Transfer of securities to / from another provider? Please answer Yes or No . 2.3.22 248 Transfer of securities to / from another provider - Number of Clients. Enter the number of clients which transferred securities to / from another provider, during the reporting period. 2.3.23 249 Transfer of securities to / from another provider - Number of Transactions. Enter the number of transfers of securities to / from another provider conducted by clients during the reporting period. 2.3.24 250 Transfer of securities to / from another provider - Value of Funds Transferred. Enter the value of all transactions relating to transfer of securities to / from another provider, conducted by clients during the reporting period. 2.3.25 251 Does the entity facilitate payments to / from Clients in other forms not listed above? Please answer Yes or No . 2.3.26 252 Other Forms of Payment - Number of Clients. Enter the number of clients which made payments using other forms of payment not listed above during the reporting period. 2.3.27 253 Other Forms of Payment - Number of Transactions. Enter the number of transactions conducted by, for or on behalf of clients, during the reporting period, using other forms of payment other than the ones listed above. 2.3.28 254 Other Forms of Payment - Value of Funds Transferred. Enter the value of funds

that were conducted by, for or on behalf of clients, using other forms of payment, during the reporting period. 2.3.29 255 Please indicate the types of other forms of payments. List the other forms of payment conducted by, for or on behalf of clients, during the reporting period, which are not listed above. 2.4.1 256 Total value of funds received, broken down by originating country of payment. Enter the total value of funds received by clients, or on behalf of clients, during the reporting period, broken down by the country where the funds originated. 2.4.2 257 Total number of transactions received, broken down by origin country of the transaction. Enter the total number of transactions, relating to funds received by clients, or on behalf of clients, during the reporting period, broken down by country of origin of the funds. 2.4.3 258 Total value of funds transferred out, broken down by the country of payment destination. Enter the total value of funds transferred out of the jurisdiction by clients, broken down by the country of payment destination. 2.4.4 259 Total number of transactions transferred out, broken down by destination country of the transaction. Enter the total number of transactions relating to outward transfers by the clients, or on behalf of clients, broken down by country of destination of the transaction, for the reporting period. 2.5.1 260 Does the entity have any comments or feedback for this tab? Please answer Yes or No. 2.5.2 261 Please use this area to provide any comments or feedback for this tab. Provide comments or feedback. Please include N/A if no comment. 3.1.1 262 Number of Clients - F2F. Provide the total number of clients, in the entity's entire current portfolio, that were onboarded via F2F methods, and not only those onboarded during the reporting period. Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 45 of 63 F2F channels include: F2F, Referrals within Group F2F, Eligible Introducers F2F, and Other Introducers - F2F. 3.1.2 263 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. 3.1.3 264 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. 3.1.4 265 Number of Clients through Referrals within Group - F2F. Enter the number of clients which were onboarded using referrals within Group - F2F for clients onboarded during the reporting period, broken down by the BOs nationality. An example of Group F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself have F2F interaction with the clients. 3.1.5 266 Number of Clients through Referrals within Group - Non F2F, broken down by nationality or country of incorporation of the client. Enter the number of clients which were onboarded using referrals within Group and via Non Face to Face Channels for the reporting period, broken down by nationality of the BOs. Example of Group Non F2F is where the entity is onboarding clients that are introduced through its group channels and the entity itself does not have F2F interaction with the clients. 3.1.6 267 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. Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 46 of 63 3.1.7 268 Number of Clients through

Eligible Introducers. Enter the number of clients which were onboarded through Eligible Introducers, during the reporting period, broken down by the nationality of the BO. 3.1.8 269 Number of Clients through Other Introducers - Non- F2F. Enter the number of clients, that were onboarded through Other Introducers Non - F2F, for the reporting period, broken down by nationality of the BOs. 3.1.9 270 Clients via Online Platforms. Enter the number of clients onboarded using online platforms during the reporting period, broken down by nationality of the BO. 3.2.1 271 Has the entity outsourced the role of AML Compliance Officer within the reporting period? Please answer Yes or No . 3.2.2 272 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 a case of the Compliance Officer turnover that includes one of each within the reporting period. 3.2.3 273 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. 3.2.4 274 How many AML Compliance Officers did the entity have in the reporting period and the previous 2 years? If no turnover of the AML Compliance Officer role in the three-year period, answer "1". 3.2.5 275 Has the entity outsourced the role of Money Laundering Reporting Officer within the reporting period? Please answer Yes or No . 3.2.6 276 To whom has the Money Laundering Reporting Officer role been outsourced? If outsourced, select the status that best describes the outsource relationship Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 47 of 63 Officer role been outsourced? 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. 3.2.7 277 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. 3.2.8 278 How many Money Laundering Reporting Officers did the entity have in the reporting period and the previous 2 years? If no turnover of the Money Laundering Reporting Officers role in the three-year period, answer "1". 3.2.9 279 Has the entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period? Please answer Yes or No . 3.2.10 280 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. 3.2.11 281 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. 3.2.12 282 How many Deputy Money Laundering Reporting Officers did the entity have in the reporting period and the previous 2 years? If no turnover of the Deputy Money Laundering Reporting Officers role in the three-year period, answer "1". Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 48 of 63 in the reporting period and the previous 2 years? 3.2.13 283 Has the entity outsourced the function of Targeted Financial Sanction screening within the reporting period? Please answer Yes or No . 3.2.14 284 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 that includes one of each within the reporting period. 3.2.15 285 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. 3.2.16 286 How many TFS Screening platforms have you had in the reporting period and the previous 2 years? If no turnover of the Targeted Financial Sanction screening function in the three-year period, answer "1". 3.2.17 287 Has the entity outsourced the function of transaction monitoring within the reporting period? Please answer Yes or No . 3.2.18 288 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. Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 49 of 63 3.2.19 289 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. 3.2.20 290 How many Transaction monitoring platforms has the entity had in the reporting period and the previous 2 years? If no turnover of the transaction monitoring platform in the three-year period, answer "1". 3.2.21 291 Has the entity outsourced the function of trading platform within the reporting period? Please answer Yes or No . 3.2.22 292 To whom has the trading platform function been outsourced? If outsourced, select the status that best describes the outsource relationship for the trading platform: Member within Group 3rd Party and Member within Group 3rd Party Select 3rd Party and Member within Group", in a case of the trading platform turnover that includes one of each within the reporting period. 3.2.23 293 What was the outsourcing country of the trading platform function at the end of the reporting period? Enter the country the entity outsourced the trading platform function to, at the end of the reporting period. 3.2.24 294 How many Trading platforms have you had in the reporting period and the previous 2 years? If no turnover of the trading platform function in the three-year period, answer "1". 3.2.25 295 Has the entity outsourced the function of liquidity platforms within the reporting period? Please answer Yes or No . 3.2.26 296 To whom has the liquidity platform function been outsourced? If outsourced, select the status that best describes the outsource relationship for the Liquidity Platform: Member within Group 3rd Party and Member within Group 3rd Party Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 50 of 63 Select 3rd Party and Member within Group", in a case of the Liquidity Platform turnover that includes one of each within the reporting period. 3.2.27 297 What was the outsourcing country of the liquidity platform function at the end of the reporting period? Enter the country the entity outsourced the liquidity platform function to, at the end of the reporting period. 3.2.28 298 How many Liquidity platforms have you had in the reporting period and the previous 2 years? If no turnover of the liquidity platform function in the three-year period, answer "1". 3.3.1 299 Physical presence - Place of Business. Enter the country of the entity's physical business operations. 3.3.2 300 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. 3.3.2 301 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. 3.3.4 302 In which country is the parent or holding company incorporated? Enter the country the parent or holding company is incorporated. 3.3.5 303 In which countries, by percentage of equity ownership, are all shareholders of the entity located. For publicly listed entities please list beneficial ownership of 10% or more. Insert 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. 3.3.6 304 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. 3.3.7 305 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. 3.3.8 306 Is the entity a Single Family Office? Please answer Yes or No. Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 51 of 63 3.4.1 307 Does the entity have any comments or feedback for this tab? Please answer Yes or No. 3.4.2 308 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 1.1.1 309 Does the Governing Body receive comprehensive reports, information and statistics regarding ML/TF/PF risks and issues? Please answer Yes or No. 1.1.2 310 Does the Governing Body review all AML/CFT/CPF related policies and procedures periodically? Please answer Yes or No. 1.1.3 311 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. 1.1.4 312 Is there an audit risk and compliance subcommittee? Please answer Yes or No. 1.1.5 313 Is there an approved Charter for the Governing Body and Sub-Committees? Please answer Yes or No. 1.1.6 314 Is the entity subject to group wide governance practices? Please answer Yes or No. 1.1.7 315 Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body? Please answer Yes or No. 1.1.8 316 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. 1.1.9 317 Does the Board / Governing Body ensure that recommendations made by the internal and external auditors Please answer Yes or No. Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 52 of 63 and regulators to address AML/CFT/CPF and Sanctions findings are acted upon in a timely manner? 1.1.10 318 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. 1.1.11 319 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. 1.1.12 320 Are any of the entity's AML Officers, Shareholders, Beneficial Owners, Directors, or Senior Management PEPs? Please answer Yes or No. 1.1.13 321 Does the Board ensure that the AMLCO/MLRO receive the appropriate training? Please answer Yes or No. 1.2.1 322 Has an AML Compliance Officer been appointed? Please answer Yes or No. 1.2.2 323 Has an MLRO been appointed? Please answer Yes or No. 1.2.3 324 Is a Deputy MLRO appointed? Please answer Yes or No. 1.2.4 325 Is the AMLCO employed at a managerial level of the company? Please answer Yes or No. 1.2.5 326 For reporting lines, does the AMLCO report to the Governing

Body? Please answer Yes or No . 1.2.6 327 Does the AMLCO maintain independence from revenues related / client facing activities? Please answer Yes or No . 1.2.7 328 Does the AMLCO have sufficient compliance/AML skills and experience to perform their function? Please answer Yes or No . 1.2.8 329 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 . 1.2.9 330 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: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 53 of 63 1.2.10 331 Does the AMLCO provide oversight of the AML/CFT/CPF and Sanctions risk assessment framework and procedures? Please answer Yes or No . 1.2.11 332 Does the MLRO maintain independence from revenues related / client facing activities? Please answer Yes or No . 1.2.12 333 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 . 1.3.1 334 Has the entity developed and implemented AML/CFT/CPF and Sanctions training and awareness programme? Please answer Yes or No . 1.3.2 335 Have the directors received AML/CFT/CPF and Sanctions training during the reporting period? Please answer Yes or No . 1.3.3 336 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 . 1.3.4 337 Has the MLRO received specialized compliance/AML/CFT/CPF training over the last year relevant to the current position? Please answer Yes or No . 1.3.5 338 Has the DMLRO received specialized compliance/AML/CFT/CPF training over the last year relevant to the current position? Please answer Yes or No . 1.3.6 339 Does the AMLCO ensure that ongoing training programs are kept up to date and relevant? Please answer Yes or No . 1.3.7 340 Are changes to policy and procedures communicated to all staff/directors and senior management? Please answer Yes or No . Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 54 of 63 1.3.8 341 Does the entity assess AML/CFT/CPF and Sanctions knowledge of its employees? Please answer Yes or No . 1.3.9 342 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. 1.3.10 343 Does the AMLCO organize or ensure AML/CFT/CPF and Sanctions training is conducted for all staff annually? Please answer Yes or No . 1.4.1 344 Does the entity have an internal audit department / unit / function with oversight over AML functions? Please answer Yes or No . 1.4.2 345 Is there a developed Internal Audit plan, with focus on AML/CFT/CPF and Sanctions, reviewed by the Board? Please answer Yes or No . 1.4.3 346 Is the Internal Audit plan approved by the Board? Please answer Yes or No . 1.4.4 347 Does the internal AML audit include reviews of the AML/CFT/CPF related policies, procedures and processes? Please answer Yes or No . 1.4.5 348 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 . 1.4.6 349 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. 1.4.7 350 Does the Board review the AML audit program? Please answer Yes or No . 1.4.8 351 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. 1.4.9 352 Where

applicable, does the internal audit include testing on functions which are outsourced? Please select Yes , No , or Not Applicable . Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 55 of 63 1.4.10 353 Where applicable, does the internal audit include testing of EI relationships? Please enter Yes, No, or Not Applicable. 1.4.11 354 Does the Internal Audit include testing for the AML/CFT/CPF and Sanctions training function? Please answer Yes or No . 1.4.12 355 Does the Internal Audit include testing for the entity's TFS and PF controls? Please answer Yes or No . 1.5.1 356 Does the entity conduct a business risk assessment which considers ML/TF/PF and Sanctions risk factors? Please answer Yes or No . 1.5.2 357 Does the entity employ a Risk Based Methodology when assessing and allocating oversight of its clients? Please answer Yes or No . 1.5.3 358 Does the entity consider the ML/TF/PF risks of the clients, (including BOs, in their risk assessment? Please answer Yes or No . 1.5.4 359 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 . 1.5.5 360 Does the entity consider the ML/TF/PF products and services (existing and new) in their risk assessment? Please answer Yes or No . 1.5.6 361 Does the entity consider the ML/TF/PF delivery channels (existing and new) in their risk assessment? Please answer Yes or No . 1.5.7 362 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 . 1.5.8 363 Does the entity consider the ML/TF/PF technology (existing and new) in their risk assessment? Please answer Yes or No . 1.5.9 364 Does the entity consider Sanctions risk factors in their risk assessment? Please answer Yes or No . Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 56 of 63 1.5.10 365 Does the entity consider PF risk factors in their risk assessment? Please answer Yes or No . 1.5.11 366 Does the entity consider outsourcing risk factors in its risk assessment? Please answer Yes or No . 1.5.12 367 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 . 1.5.13 368 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. 1.5.14 369 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. 1.5.15 370 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. 1.6.1 371 Does the entity rely on Group AML/CFT policies and procedures? Please answer Yes or No . 1.6.2 372 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 . 1.6.3 373 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 . 1.6.4 374 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 . Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 57 of 63 1.6.5 375 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 . 1.6.6 376 Does the entity have Board, or governing body, approved policies and procedures for establishing Source of Funds? Please answer

Yes or No . 1.6.7 377 Does the entity have Board, or governing body, approved policies and procedures for employee screening? Please answer Yes or No . 1.6.8 378 Does the entity have Board or governing body approve policies and procedures for training of staff? Please answer Yes or No . 1.6.9 379 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 . 1.6.10 380 Does the entity have policies and procedures on collecting due diligence on counterparties and business associates? Please answer Yes or No . 1.6.11 381 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 . 1.6.12 382 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. 1.7.1 383 Does the entity have a screening process? Please answer Yes or No . 1.7.2 384 Is the screening process manual, automated or a combination? Select which best applies: Manual, Automated, or Automated with Manual Checks. Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 58 of 63 1.7.3 385 Is the screening process fully or partially outsourced? Please select Fully or Partially . 1.7.4 386 When designated lists are updated, does the screening process reflect these updates within 24 hours? Please answer Yes or No . 1.7.5 387 Is sanctions monitoring done in real time or after the event? Select what applies: No process , After the event , or Real time . 1.7.6 388 Is the customer and counterparty database screened against the designated H.M. Treasury list? Please answer Yes or No . 1.7.7 389 Are procedures in place to ensure customers / counterparties are screened prior to payouts (remittance of funds)? Please answer Yes or No . 1.7.8 390 Does the entity have Asset Freeze procedures? Please answer Yes or No . 1.7.9 391 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 . 1.7.10 392 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 . 1.7.11 393 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 . 1.7.12 394 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? 1.7.13 395 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 . 1.8.1 396 Does the entity have transaction monitoring policies and procedures developed commensurate to its operations? Please answer Yes or No . 1.8.2 397 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 . 1.8.3 398 Does the entity have in place an automated system

for monitoring transactions for potential suspicion and reporting suspicious transactions? Please answer Yes or No . 1.8.4 399 Is there a requirement for senior management approval before establishing high risk business relationships i.e. with PEPs? Please answer Yes or No . 1.8.5 400 Does the entity have EDD procedures? Please answer Yes or No . 1.8.6 401 Does the entity apply EDD on customers and counterparties based in higher-risk countries? Please answer Yes or No . 1.8.7 402 Where high risk clients are identified, did the entity conduct EDD measures for every transaction such customers carry out? Please answer Yes or No . Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 60 of 63 1.8.8 403 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. 1.9.1 404 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 . 1.9.2 405 Does the entity's policies and procedures identify the MLRO and how to make a filing to them? Please answer Yes or No . 1.9.3 406 Does the entity have policies and procedures for reporting to the FRA? Please answer Yes or No . 1.9.4 407 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. 1.9.5 408 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. 1.9.6 409 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. 1.9.7 410 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 . 1.9.8 411 Has the entity been penalized or received a warning for non-compliance, from the FRA? Please answer Yes or No . 1.9.9 412 Does the entity maintain a log identifying all internal SARs filed to the MLRO along with their status? Please answer Yes or No . 1.9.10 413 Does the entity maintain a log identifying all SARs filed to the FRA along with their status? Please answer Yes or No . Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 61 of 63 1.9.11 414 If the MLRO decides not to file a SAR to the FRA is the reason for not filing documented? Please answer Yes or No . 1.10.1 415 Does the entity maintain Record Keeping Procedures? Please answer Yes or No . 1.10.2 416 How many years after the end of the business relationship are records retained? Enter the number of years 1.10.3 417 Are any records retained and accessible in the Cayman Islands? Please answer Yes or No . 1.10.4 418 How accessible and swiftly available are records for competent authorities - in hours? Enter the average time to comply in hours. 1.10.5 419 Does the entity maintain a declined business log? Please answer Yes or No . 1.10.6 420 Does the entity maintain records of its training programme? Please answer Yes or No . 1.11.1 421 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. 1.11.2 422 Was a risk assessment conducted on all outsourcing arrangements prior to initiation of the arrangement? Select which best applies: Yes , No or Not Applicable . 1.11.3 423 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. 1.11.4 424 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.

1.11.5 425 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. Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 62 of 63

1.11.6 426 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.

1.11.7 427 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.

1.11.8 428 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.

1.11.9 429 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.

1.11.10 430 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.

1.11.11 431 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.

1.11.12 432 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.

1.12.1 433 Do you have any comments or feedback for this tab? Please answer Yes or No .

1.12.2 434 Please use this area to provide any comments or feedback for this tab. Provide any comments or feedback for this tab. Version: 1.4 AML Survey Completion Guide Securities and Registered Persons Page 63 of 63 Enter 'N/A' if no comment.