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# **AML Return – Completion Guide: Virtual Assets Service Providers (VASPs)**

Document version: 1.5

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**Revision History:**

| <b>Effective Date</b> | <b>Version Number</b> | <b>Revision Description</b>  |
|-----------------------|-----------------------|--|
| 13 September 2022     | 1.0                   | Initial release of document  |
| 3 October 2022        | 1.1                   | Update to definitions  |
| 1 March 2023          | 1.2                   | Updates to definitions, descriptions, and explanations   |
| 1 March 2024          | 1.3                   | Updates to inherent risk and controls questions  |
| 1 March 2025          | 1.4                   | Updates to definitions, descriptions, explanations, and inherent risk questions                                  |
| 1 March 2026          | 1.5                   | Updates to section 1, section 3 and section 4 along with updates to the definitions, descriptions and questions. |

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## 1 INTRODUCTION

The Monetary Authority Act (2020 Revision) (the “**MAA**”) prescribes the principal functions of the Cayman Islands Monetary Authority (the “**Authority**”), including regulating and supervising financial services business carried on in or from within the Islands in accordance with the MAA and the regulatory laws, and monitoring compliance with the Anti-Money Laundering Regulations (2025 Revision) (the “**AMLRs**”) pursuant to Sections 6(1)(b)(i), and (ii) of the MAA, respectively. In addition, Section 6(2) of the MAA requires the Authority in performing its principal functions to, among other things, act in the best economic interest of the Islands and promote and maintain a sound financial system and grants it such ancillary powers as may be required to fulfil its functions. Ensuring that regulated entities comply with the AMLRs when providing financial services is therefore an important jurisdictional matter to ensure that the Cayman Islands remains a financial centre of choice and that the financial system within the Islands is one that is strong and trusted.

In order to obtain the information necessary to discharge its principal functions, particularly that of monitoring compliance with the AMLRs, the Authority periodically undertakes sectoral money laundering/terrorist financing/proliferation financing (ML/TF/PF) risk assessments as part of its risk-based approach to Anti-Money Laundering/Countering the Financing of Terrorism (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 Return 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 Return and submit it through the Authority’s web-based e-mail software, to the Anti-Money Laundering Division (“**AML/D**”). The AML Return is issued in accordance with Regulation 53A of the AMLRs, pursuant to which the Authority may require a FSP to provide any information that the Authority reasonably requires in connection with the exercise of its functions. Requiring FSPs to provide the information by completing this AML Return is necessary to ensure that the Authority has the requisite information necessary to perform its functions as outlined in Section 6 of the MAA, which includes the monitoring of compliance with the AMLRs.

In addition, Section 24(1) of the Virtual Asset (Service Providers) Act (2024 Revision) further sets out the duty of the Authority to maintain a general review of virtual asset services in the Islands and empowers the Authority to examine the affairs of a licensee in any manner as it deems fit for the purposes of confirming that the AMLRs are being complied with and to carrying out any other functions. These functions include monitoring compliance with the AMLRs pursuant to Section 6(1)(b)(ii) of the MAA, as well as carrying out the duty of maintaining a general review of virtual asset services in the Islands pursuant to Section 24(1)(a) of the VASP Act.

This Guide provides instructions and support to VASP for accessing, completing, and submitting the AML Return to AML/D.

Please note that in accordance with Regulation 53B(1) of the AMLRs, failure to provide the requested information may amount to a criminal offence pursuant to Regulation 56 of the AMLRs and/or result in the imposition of an administrative fine of up to \$1,000,000 for a corporate body or \$100,000 for an individual, pursuant to Sections 42A, and 42B(4) of the MAA.

The Authority also has powers to take enforcement action pursuant to the relevant provisions of Section 25 of the VASP Act for failure to comply with a requirement to provide information, which may include revocation of a licence. Providing false or misleading information to the Authority may also amount to a criminal offence and result in a fine of ten thousand dollars on summary conviction and to imprisonment for six months pursuant to Section 24(3) of the VASP Act.

## 2 FORM INFORMATION

The AML Return – VASP Return is to be completed by each FSP registered as a VASP - commonly referred to as the “Entity” for purposes of this form.

The AML Return – VASP Return is made up of two (2) sections for collecting AML risk data: 1) AML Inherent Risks; and 2) AML Controls.

## 3 ACCESSING AND SUBMITTING THE AML RETURN

### 3.1 ACCESS TO THE AML RETURN

Entities will receive an invitation to the web-based Return by email using the current email contact details of the Entity which the Authority has on record. Each member of the Entity who receives an invitation email can activate their own account. The invitation email is specific to the recipient’s email address and cannot be shared or forwarded. Clicking on the link provided in the invitation email will take the user to the account creation webpage. On successful account activation, the user will receive a confirmation email.

Logging into the Strix portal is then accomplished by clicking on the ‘Return Home’ button available immediately after activating, or via the link provided in the confirmation email. Account login is only possible using a two-factor verification code which will be sent by email to the individual. If an Entity has multiple points of contact on file, they will all have joint access to the same Return.

The Authority is using the following entity contacts to distribute the AML Return: Anti-Money Laundering Compliance Officer (“AMLCO”), Money Laundering Reporting Officer (“MLRO”), Deputy Money Laundering Reporting Officer (“DMLRO”), Registered Office primary contact and any other additional contacts, upon request from the Entity. If an Entity is unsure of the current contact details the Authority has on record, they can contact the Authority at [AMLSurveys@cima.ky](mailto:AMLSurveys@cima.ky).

To access the AML Return:

1. When the AML Return is distributed from Strix, the recipients will receive an invitation email from “Cayman Islands Monetary Authority” with the address [AMLDoNotReply@cima.ky](mailto:AMLDoNotReply@cima.ky). The email will request the recipient to ‘Confirm Account’. The recipient should click on the ‘Confirm Account’ button, which will redirect the recipient to the activation page using their default browser. A modern browser (e.g. MS Edge, Chrome, Safari) should be used for security purposes.



### Cayman Islands Monetary Authority

In accordance with our duties under section 6(b)(ii) of the Monetary Authority Act, the Authority requires the entity to complete the following AML/CFT/CFP and Sanctions survey.

Survey Name: **Securities AML/CFT Survey**

Submission Deadline: **15 September 2022, 23:59 (UTC-05:00) Bogota, Lima, Quito, Rio Branco**

Entity Name: Company ABC

Entity Unique ID: BSD1234

The **Username** for this account is:

The following link provides steps to **activate your account**:

[Confirm Account](#)

If the above button is not clickable, try clicking the URL or copying and pasting the URL below into the address bar of your web browser.

<https://amlidentity.cimaconnect.com/UserActivation/SetPassword?SecurityCode=YJa0JBLi86VZVCRb8xnm3fq3fSoAMoPYyQ6XKFqbx0MoYGkSpT5b5bDc%2B2cpgbPQ8d%2BUVVhbZktQht%2F4d2cbloYpsg%2Bjke0tE3GLwMObYSoP%2Bk8rPURRSvrPSQt6JA5hgsaBaC6uvcZV4KB266HIFgh4FhAtaTNSa3IE3aIA%3D>

For any questions concerning the survey or the current reporting cycle, please contact: [AMLSurvey@cima.ky](mailto:AMLSurvey@cima.ky)

Please do not reply to this email, it is automatically generated.

Disclaimer:  
This message contains **confidential** information and is intended only for the addressee. If you are not the addressee you should not disseminate, distribute or copy this e-mail. If you have received this e-mail by mistake, delete this e-mail from your system.

Strix™ AML is part of the Financial Transparency Solutions product suite. [www.f-solutions.com](http://www.f-solutions.com)

- 2. The recipient will then be asked to create a password which should include at least one uppercase letter, lowercase letter, number, and a special character. The password is required to be between 8 and 16 characters long.



### Set Your Password

New Password \*

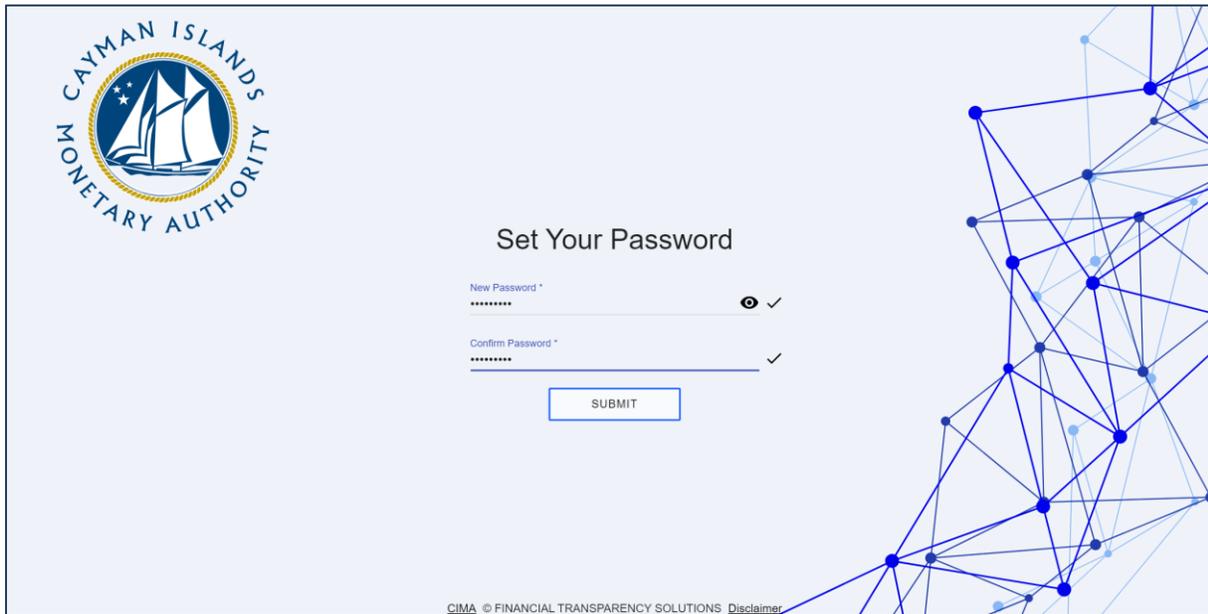
Confirm

Password must meet the following requirements:

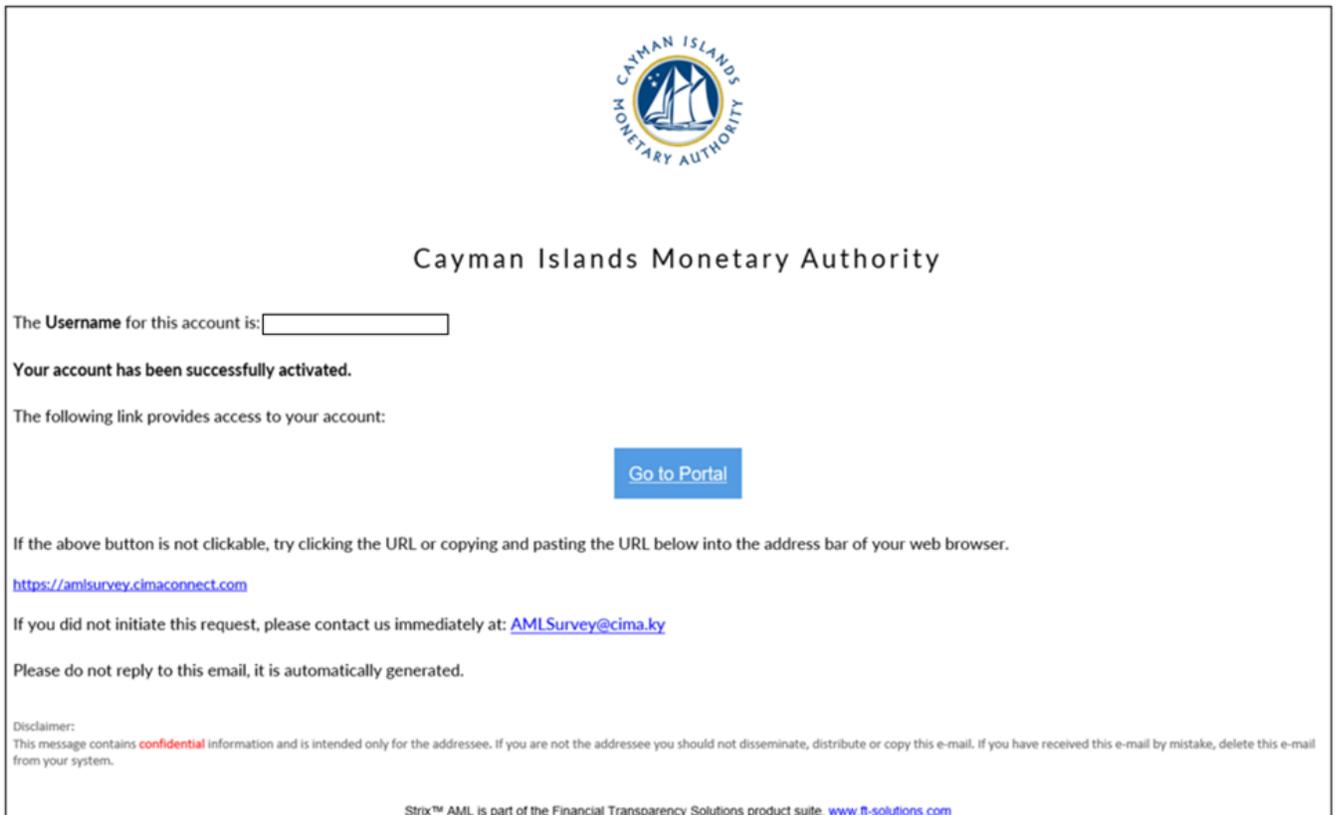
- ✗ At least one lower case letter
- ✗ At least one upper case letter
- ✗ At least one special character
- ✗ At least one number
- ✗ Be at least 8 characters
- ✗ Maximum length of 16 characters

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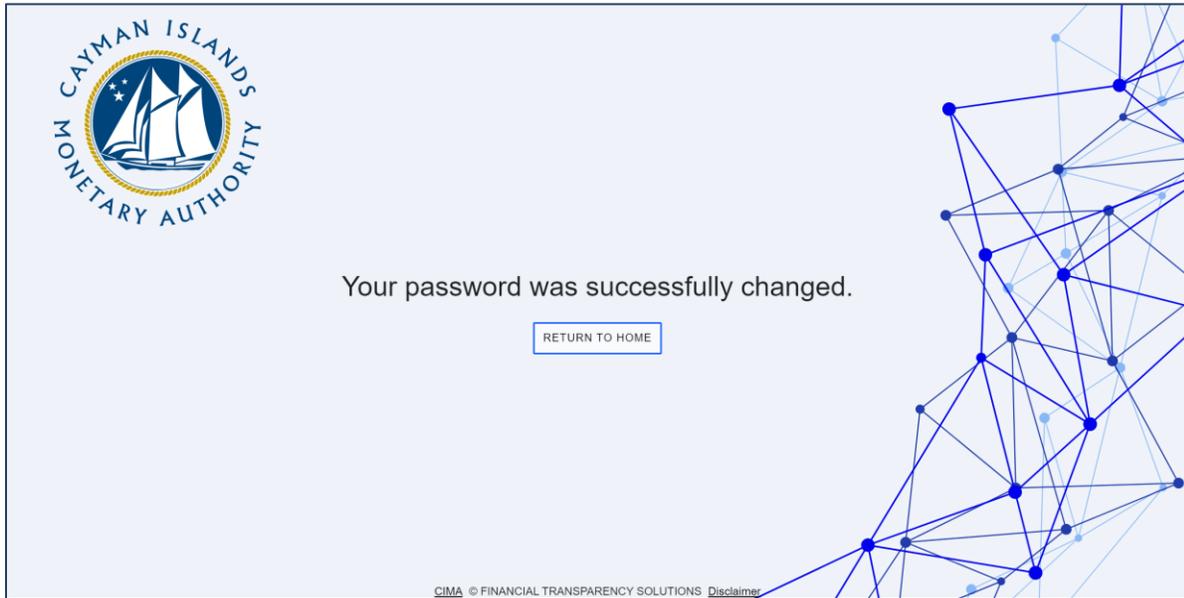
- 3. The recipient will be asked to re-enter their password.



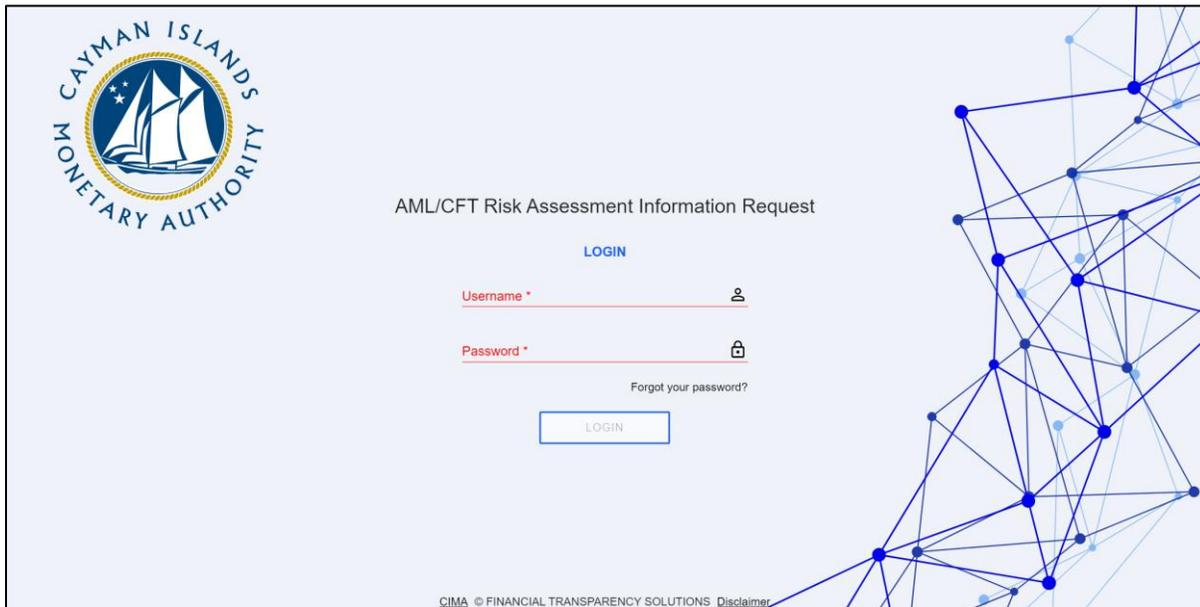
- 4. Once the recipient’s password has been re-entered, and matches, they can submit and finish the activation process. An email “Notification of Successful Activation” will be sent providing a ‘Go to Portal’ link which can be used for all future access.



- 5. The user should then click on the 'RETURN TO HOME' button.



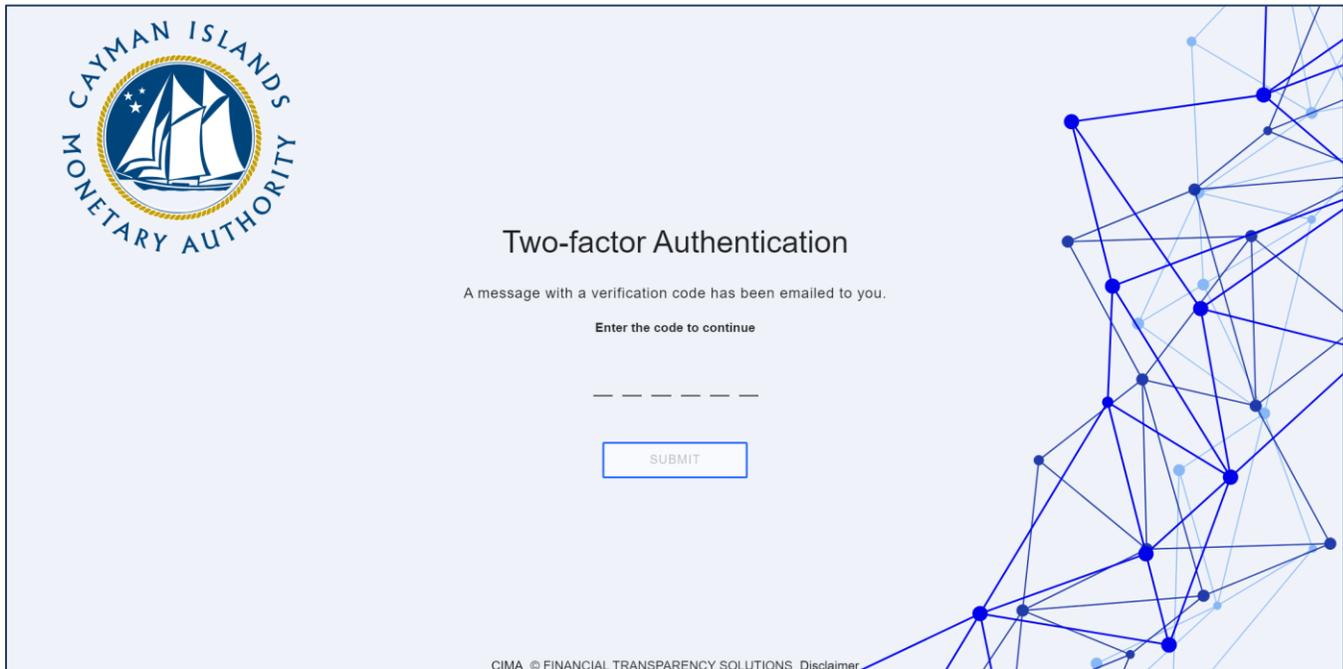
- 6. The recipient should then enter their username, which is their email address where they received the AML Return invite, and the password they just created.



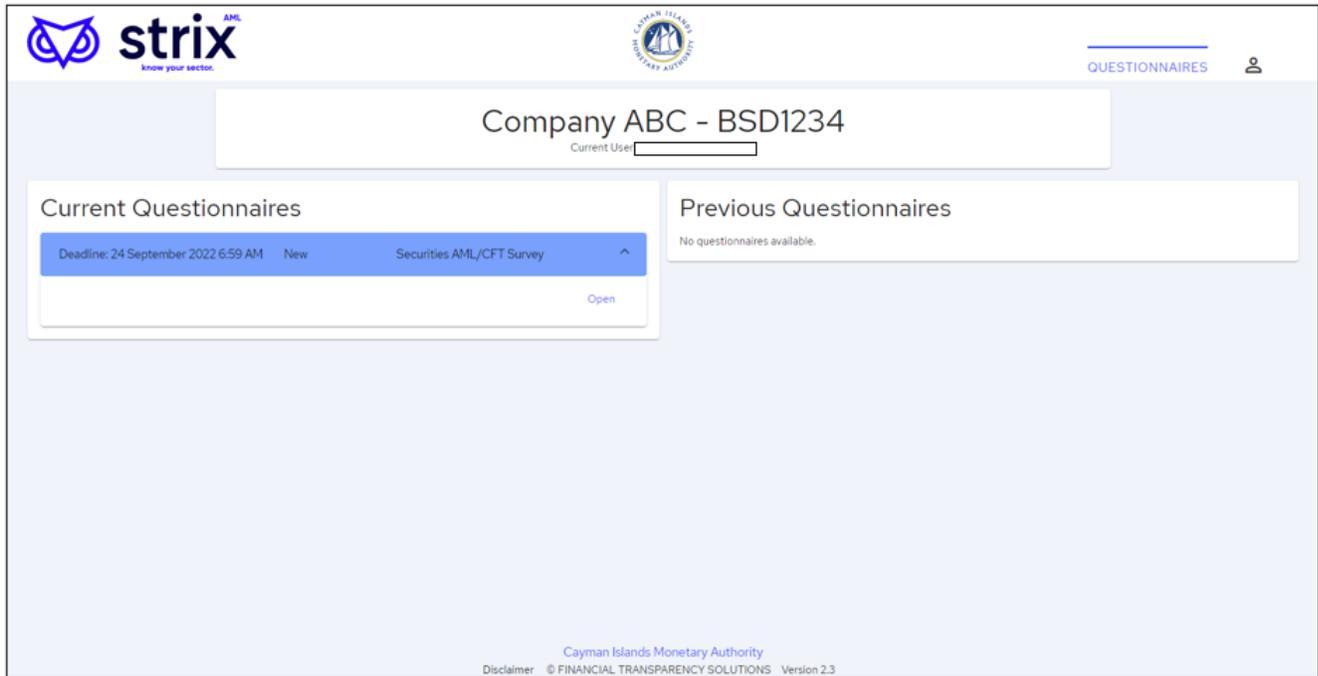
- 7. A six digit two-factor authentication code will be sent to the recipient's email address.



- 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 Return request. If an AML Return recipient is a contact for two (2) or more FSPs, or where an Entity has two or more licences or registrations, related Returns will be listed here for the recipient to view and access.



## 3.2 COMPLETING THE AML RETURN

1. Click the Current Questionnaire to access the AML Return and start populating the Return with the required data.
  - a. Completion guidance for the AML Return is available at section 5 of this Guide below.
  - b. The recipient(s) can open, update, and close the AML Return as many times as needed prior to the Return's due date so long as the recipient selects 'Save'.
  - c. Once the AML Return has been completed it can either be 'Saved' and 'Exported' for internal review or 'Saved' and 'Submitted' to the Authority. Users should note that the Return does not support Excel import functionality. The entity may utilise the XBRL functionality to assist in completing the Return. The Strix XBRL Overview User Guide is published on the Authority's website, and can be accessed at: <https://www.cima.ky/cima-releases-strix-xbrl-overview-user-guide>
  - d. Upon submission, you will receive a confirmation email from Cayman Islands Monetary Authority stating, 'Notification of Successful Submission'. The Entity's name and the Return name will be listed for verification, which is useful for instances where users are submitting for more than one entity.
  - e. Once the AML Return is 'Submitted' an Excel and PDF copy of the completed Return will be available under 'Current Questionnaire'.
  - f. Upon submission to the Authority, a review of the AML Return will be conducted by a member of the AMLD. If information is missing or needs clarification the Authority will 'Reject' the AML Return through an email 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 email.

- g. Partial or incomplete submissions will only be permitted by the Authority under approved circumstances. Prior to submitting an 'Incomplete' AML Return, the Entity is required to submit a Request for Incomplete Submission to the Authority. Incomplete Submission Requests are to be submitted to [AMLSurveys@cima.ky](mailto:AMLSurveys@cima.ky) detailing the following:
  - i. Licence or Registration Name
  - ii. Licence or Registration Number
  - iii. Date of Licence or Registration
  - iv. List of current Directors
  - v. Number of Clients
  - vi. Reason for requesting to make an Incomplete Submission.
2. If a user receives or has access to more than one Return, they will not see the additional Return(s) in the 'Current Return' 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 Return. Given that there are several questions in the Return 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:
  - 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 Return, 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 Return recipient has exceeded the number of permitted failed login attempts, their account will be temporarily locked. An email will be sent to the user identifying that they won't be able to log in. There are three (3) stages of lock out: **1**) locked out for five (5) minutes; **2**) locked out for ten (10) minutes; and, **3**) if the user persists, locked out permanently.

To avoid being locked out, if the user fails to remember their password, they should update their password on the login page.

If the user is permanently locked out, they should contact [AMLSurveys@cima.ky](mailto:AMLSurveys@cima.ky) to request having their account re-activated.

## 4.2 INTERNET BROWSER

Users should be aware that the AML Return will not open using the legacy Windows Explorer browser or with outdated 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 another modern browser.

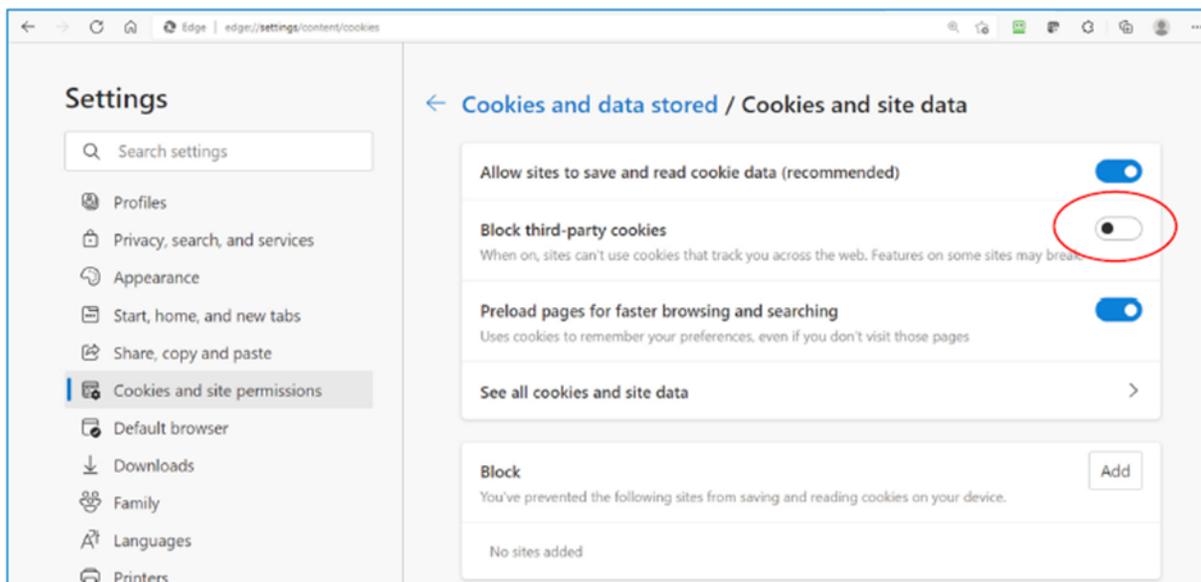
## 4.3 TWO-FACTOR AUTHENTICATION

Due to the security permissions around the two-factor authentication, the invite to the AML Return, or the access to the portal, cannot be shared with uninvited recipients. If entities wish to add additional users to assist with completing or reviewing the form, they can contact [amlsurveys@cima.ky](mailto:amlsurveys@cima.ky).

If an Entity's recipient is set up as a contact to the Strix portal but they are not receiving their two-factor authentication code, they should attempt the following prior to contacting [amlsurveys@cima.ky](mailto:amlsurveys@cima.ky):

- 1) Check the date / time settings of the individual's computer and be sure they are set to 'Automatic'.
- 2) Try a different browser on the same computer (a secure modern browser is required – Chrome, Edge, Safari, Firefox).
- 3) Ensure that [amldonotreply@cima.ky](mailto:amldonotreply@cima.ky) is not blocked by the individual / entity's network security.
- 4) Check that third party cookies are allowed:

### Example of Microsoft Edge Cookie Setting:



## 4.4 DATA AND SECURITY

The AML Return, the auto-generated communication from Strix, and the data collected from FSPs in the AML Return are all maintained on-premises 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.

**NOTE:** Please consider saving a copy of the completed AML Return for your records. The Authority will not maintain copies of historical Returns of its supervised entities and therefore, it is recommended that entities save a copy of their submissions for their own record-keeping purposes. Additionally, as per the

Authority's data management policy, submissions for terminated entities will no longer be made available to their contacts in the Strix portal.

## 4.5 APPLICABLE FEES

There are no fees associated with this Return.

## 5 AML RETURN GUIDANCE

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

### 5.1 TERMS AND DEFINITIONS

#### AML Inherent Risk Factor Descriptions

| Terms/Abbreviations/Acronyms | Definition/Meaning   |
|------------------------------|--|
| AMLCO                        | Anti-Money Laundering Compliance Officer means the person designated in accordance with Regulation 3(1) of the Anti-Money Laundering Regulations (2025 Revision), as amended.  |
| AMLRs                        | Anti-Money Laundering Regulations (2025 Revision), as amended.   |
| Beneficial Owner             | <p>Or ("BO") 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–</p> <p>(a) in the case of a legal person, other than a company whose securities are listed on a recognised 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;</p> <p>(b) in the case of any legal person, a natural person who otherwise exercises ultimate effective control over the management of the legal person; or</p> <p>(c) in the case of a legal arrangement, the trustee or other person who exercises ultimate effective control over the legal arrangement.</p> <p><i>As guidance, in instances where a BO has multiple nationalities, where applicable, the entity is to disclose the nationality which could present higher risks as referenced in Regulation 8A of the AMLRs.</i></p> |

|                                       |   |
|---------------------------------------|---|
| Beneficiary                           | In relation to wire transfers or transfer of virtual assets, means the natural or legal person or the legal arrangement who is identified by the originator as the receiver of the requested transfer.  |
| Broker-Dealer                         | A person who carries out one or more of the activities, specified in paragraph 1(a) of Schedule 2 of the Securities Investment Business Act (2020 Revision), as amended:<br><br>buying, selling, subscribing for or underwriting securities as an agent.  |
| 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.<br><br>Generally, clients/customers are made up of natural persons, legal persons, and/or legal arrangements.  |
| Corporate Entity                      | A body corporate constituted under the Laws of the Islands or any other jurisdiction, which is formed specifically to perform activities, such as operating an enterprise or holding assets.  |
| Currency used for the Return          | <b>United States Dollars (USD\$).</b><br><br>All other currencies must be converted to US\$, unless otherwise stated, using the prevailing rate of exchange as at the last day of the reporting period.   |
| 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 (“DMLRO”) means the “nominated officer” as defined in regulation 33(2) of the AMLRs.  |
| Eligible Introducers (EI)             | 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.<br><br>The Eligible Introducer must satisfy the conditions set out in Regulation 25 of the AMLRs i.e., a person who falls within one of the categories under regulation 22(1)(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 Return, an 'Entity' is the holder of VASP registration or licence that is responding to this Return.   |
| F2F                        | Face-to-Face means the engagement of a client directly, with the natural person physically present. The engagement will not be via phone, email, online, etc.   |
| Fiat Currency              | Currency that is issued exclusively by the relevant body in a country or by a government that is designated as legal tender in its country of issuance through, among other things, government decree or law.   |
| Fintech Services           | Services that use innovative technology to improve, change or enhance how a financial services business is conducted but is not a virtual asset service.  |
| Foundation                 | This definition refers to Cayman Islands foundation companies that are governed by the Companies Act (2025 Revision), except to the extent that it is modified by the Foundation Companies Act (2025 Revision) or those foundation companies established in other jurisdictions.  |
| FRA                        | The Financial Reporting Authority ("FRA") is the Cayman Islands Financial Intelligence Unit responsible for deterring, preventing and detecting money laundering, terrorist financing and the financing of proliferation.   |
| Gov / Pub Sector           | Business conducted with companies who are Government or in the Public Sector. Companies in which a government has a controlling interest; and in respect of such company, includes all subsidiary entities of the company.  |
| 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                       | For the purpose of the AML Survey, a high net worth individual (HNWI) is:<br><ul style="list-style-type: none"> <li>(i) an individual whose net worth is approx. US\$1,000,000 or its equivalent in any other currency; or</li> <li>(ii) any person that has total assets of not less than approx. US\$5,000,000 or its equivalent in any other currency.</li> </ul> <p>HNWIs also include those clients who are Ultra HNWIs.</p> |
| Import and Export Business | A company that facilitates trades of goods and commodities between domestic and foreign companies. In other words, it's a company that buys goods internationally and ships them in for domestic purchases  |

|                            |   |
|----------------------------|---|
|                            | and/or exports goods and services produced in the home country for sale to other markets.   |
| Individual                 | A client who is a Natural Person and not a Legal Person or Legal Arrangement.   |
| Issuance of virtual assets | Means the sale of newly created virtual assets to the public in or from within the Islands in exchange for fiat currency, other virtual assets or other consideration but does not include the sale of virtual service tokens.  |
| Legal Arrangement          | A Trust, Partnership or other entity created between parties which lacks separate legal personality.  |
| Legal Person               | A company or other entity created by operation of law with separate legal personality.  |
| Market Maker               | <p>A person who engages in activities specified in paragraph 1(b) of Schedule 2 of the Securities Investment Business Act (2020 Revision), as amended, in compliance with the rules of any market in securities operating under the oversight of or rules made by a recognised securities exchange or a recognised overseas regulatory authority:</p> <p>buying, selling, subscribing for, or underwriting securities as principal where the person entering into that transaction —</p> <p>(i) holds themselves out as willing, as principal, to buy, sell or subscribe for securities of the kind to which the transaction relates at prices determined by that person generally and continuously rather than in respect of each particular transaction;</p> <p>(ii) holds themselves out as engaging in the business of underwriting securities of the kind to which the transaction relates; or</p> <p>(iii) regularly solicits members of the public with the purpose of inducing them, as principals or agents, to buy, sell, subscribe for or underwrite securities and such transaction is entered into as a result of such person having solicited members of the public in that manner.</p> |
| MLRO                       | Money Laundering Reporting Officer “MLRO” means the “nominated officer” as defined in regulation 33(1) of the AMLRs.  |
| ML/TF/PF                   | Money Laundering/Terrorism Financing/Proliferation Financing.   |
| MSB                        | <p>Money Services Business (“MSB”) means the business of providing, in or from within the Islands, any of the following services:</p> <p>(a) money transmission;</p>  |

|                        |  |
|------------------------|--|
|                        | <p>(b) cheque cashing;<br/> (c) currency exchange;<br/> (d) the issuance, sale or redemption of money orders or traveller’s cheques.</p>   |
| Natural Person         | A human being, as distinguished from a company or other entity created by operation of law with separate legal personality.  |
| Nominee Director       | A natural or legal person who takes on the role of company director on 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-Compliant Accounts | Where a person carrying out relevant financial business is unable to obtain information required under Part IV of the AMLRs to satisfy relevant customer due diligence measures.   |
| Non – F2F              | Non-Face-to-Face (“Non-F2F”) is where a customer can open an account and transact with a regulated Financial Service Provider without being physically present for identification purposes, at the physical premises/office of the FSP.  |
| NPO                    | <p>A Non-Profit Organisation (“NPO”) is a company or body of persons, whether incorporated or unincorporated, or a Trust –</p> <p>(a) established or which identifies itself as established primarily for the promotion of charitable, philanthropic, religious, cultural, educational, social or fraternal purposes, or other activities or programmes for the public benefit or a section of the public within the Islands or elsewhere; and</p> <p>(b) which solicits contributions or raises funds from the public or a section of the public within the Islands or elsewhere.</p> |
| Originator             | In relation to a transfer of virtual asset, means a person, whether natural or legal, who places an order with the virtual asset provider for a virtual asset transfer.  |
| Owner or Operator      | <p>In relation to a virtual asset trading platform, means –</p> <p>(a) the single entity or group which exerts management control over the platform;</p> <p>(b) where a single entity or group which exerts management control is not identifiable, either –</p> <p>(i) the entity through which the platform operates; or</p>   |

|                  |  |
|------------------|--|
|                  | <p>(ii) the entity through which the platform contracts with users of the platform; or</p> <p>(c) where an entity or group under paragraph (a) or (b) is not identifiable, the entity or group that provides the services offered by the platform to the users of the platform.</p>  |
| OSP              | <p>Outsourced Service Provider (“OSP”) is a third party, either an affiliated entity within a group or an entity that is external to the corporate group, that provides functions or activities on a continuing basis to a FSP, that would normally be undertaken by the regulated entity, now or in the future.</p> <p>Outsourcing does not include purchasing contracts.</p>   |
| PEP              | <p>“Politically Exposed Person” includes –</p> <p>(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.</p> <p>(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</p> <p>(c) a person who is or has been entrusted with a prominent function by an international organization, for example, a member of senior management, such as a director, a deputy director and a member of the board or equivalent functions.</p> |
| Private VA Coin  | <p>A virtual asset issued, transferred, or settled on a private (permissioned) network in which an operator or consortium restricts participation by controlling access to the network and/or the ability to validate transactions and/or view ledger data.</p>  |
| Public VA Coin   | <p>A virtual asset issued, transferred, or settled on a public (permissionless) network in which no prior authorisation is required to create or use a wallet/address or to submit transactions, and in which transaction validation is conducted via publicly available consensus rules.</p>  |
| Reporting Period | <p>January 1 to December 31 of the applicable year.</p>  |

|                                      |   |
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| Securities Advisor                   | <p>A person who carries on one or more of the activities, specified in paragraph 4 of Schedule 2 of the Securities Investment Business Act (2020 Revision), as amended:</p> <p>Advising a person on securities if the advice is –</p> <p>(a) given to the person in that person’s capacity as an investor or potential investor or in that person’s capacity as agent for an investor or a potential investor; and</p> <p>(b) advice on the merits of that person’s doing any of the following (whether as principal or agent) –</p> <ul style="list-style-type: none"> <li>(i) buying, selling, subscribing for or underwriting a particular security; or</li> <li>(ii) exercising any right conferred by a security to buy, sell, subscribe for, or underwrite a security.</li> </ul> |
| Securities Manager                   | <p>A person who carries on one or more of the activities, specified in paragraph 3 of Schedule 2 of the Securities Investment Business Act (2020 Revision), as amended:</p> <p>Managing securities belonging to another person in circumstances involving the exercise of discretion.</p>   |
| Source of Funds                      | <p>The origin of the assets that will be used to form and maintain the business relationship.</p> <p>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.</p> <p>Take this into account when answering questions relating to the Nature of Business – Source of Funding.</p>   |
| Special Economic Zone Business       | <p>Any type of business authorised to be carried on in a Special Economic Zone pursuant to any legislation enforced in the Islands.</p>   |
| Targeted Financial Sanctions (“TFS”) | <p>Includes asset freezing, 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”).</p>  |
| TCSP                                 | <p>Includes those entities conducting Trust, Company Manager, and Corporate Service Provider business.</p>  |
| Transaction                          | <p>For the purposes of this AML Return, a transaction, whether fiat or virtual currency, is the movement of assets, whether it be between the client and the entity,</p>  |

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|   |                        | <p>the client account and a third party, or the entity on behalf of the client.</p> <p>Fees paid from an external source, other than the client account held by the entity, should be reported as a transaction.</p> <p>Fees paid from client accounts, held by the entity, along with payments made to governments for taxes associated with securities trades should be excluded from the report.</p> |
| Trust                                   |                        | A legal arrangement which distinguishes between the legal and beneficial ownership of property. Legal ownership is transferred to a trustee who manages and administers the property for the benefit of the beneficiaries or for the furtherance of certain purposes.   |
| Ultra HNWIs                             |                        | For the purpose of the AML Survey, Ultra-High Net Worth Individuals, also referred to as UHNWIs, are all HNWIs whose net worth is greater than or equal to US\$30,000,000.  |
| Value of Client Assets                  |                        | The total market value of assets held for or on behalf of a client or clients.  |
| Virtual Asset                           |                        | A virtual asset as specified in the Virtual Asset (Service Providers) Act (2024 Revision), or as amended, is a digital representation of value that can be digitally traded or transferred and can be used for payment or investment purposes but does not include a digital representation of fiat currencies.   |
| Virtual Asset Custodian                 |                        | A VASP who provides virtual asset custody services in or from within the Islands.   |
| Virtual Asset Custody Service           |                        | The business of safekeeping or administration of virtual assets or the instruments that enable the holder to exercise control over virtual assets.  |
| Virtual Assets Products and Services    |                        | Includes those services identified within the Virtual Asset (Service Providers) Act (2024 Revision) ("VASP Act"), or as amended, as well as products which include any digital representation of value that can be digitally traded, transferred or used for payment.   |
| Virtual Asset Service Providers (VASPs) |                        | An entity that is registered pursuant to section 6(3) of the VASP Act or licensed as a virtual asset custodian or trading platform pursuant to section 8(2)(a) of the VASP Act, 2024 Revision, or as amended.   |
| Timeframe                               | Value of Transactions  | Value of transactions processed for clients <b>during the reporting period.</b>   |
| Timeframe                               | Number of Transactions | Number of transactions processed for the clients <b>during the reporting period.</b>  |

| <b>AML Inherent Risk Questions:</b> |                     |  |  |
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| <b>Ref No.</b>                      | <b>Question No.</b> | <b>Question</b>  | <b>Description/Explanation</b>   |
| 1.1.1                               | 1                   | Total clients/customers at the end of the reporting period.                      | <p>Enter the <i>total</i> number of clients the entity had at <i>the end of</i> the reporting period.</p> <p>Where applicable, the number of clients/ customers should only include those of the Cayman Islands legal entity.</p> <p>Total clients consist of Natural Persons and Legal Persons and Arrangements.</p>  |
| 1.1.2                               | 2                   | Total clients/customers throughout the reporting period.                         | <p>Enter how many clients, in <i>total</i>, the entity conducted business with, <i>during</i> the reporting period.</p> <p>This category is specific to all clients that the entity dealt with throughout the reporting period. Therefore, the combined total should include both current and past relationships/clients falling within the January to December timeframe.</p> |
| 1.1.3                               | 3                   | Total New clients/ customers onboarded during the reporting period.              | Enter the total number of <b>new</b> clients that were onboarded during the reporting period.  |
| 1.1.4                               | 4                   | Total number of Transactions during the reporting period – Fiat.                 | <p>Enter the total number of all <i>Fiat</i> transactions processed for clients during the reporting period.</p> <p>Where applicable, the total transactions should only include those of the Cayman Islands legal entity.</p>   |
| 1.1.5                               | 5                   | Total number of Transactions during the reporting period – Virtual Assets.       | <p>Enter the total number of all <i>Virtual Asset</i> transactions processed for clients during the reporting period.</p> <p>Where applicable, the total transactions should only include those of the Cayman Islands legal entity.</p>  |
| 1.1.6                               | 6                   | Total Value of Fiat Transactions processed during the reporting period.          | Enter the total value of <i>Fiat</i> transactions processed for clients during the reporting period.   |
| 1.1.7                               | 7                   | Total Value of Virtual Asset Transactions processed during the reporting period. | Enter the total value of <i>Virtual Asset</i> transactions processed for clients during the reporting period.  |
| 1.1.8                               | 8                   | Total number of High-Risk clients/customers at the end of the reporting period.  | Enter the total number of High-Risk clients the entity has at the end of the reporting period.   |

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| 1.1.9  | 9  | Total number of PEP clients/ customers at the end of the reporting period.                                  | <p>Enter the total number of PEPs the entity conducts business with at the end of the reporting period, broken down by the nationality of the PEP.</p> <p>This category is specific to all PEPs. Therefore, the combined total should include, but not limited to, Natural Persons/ individual clients who are PEPs, Legal Persons that have related UBOs, Directors or other controlling persons of corporate entities that are PEPs, and legal arrangements where settlors of Trusts are PEPs.</p> |
| 1.1.10 | 10 | Total number of clients that are relatives or close associates of PEPs, at the end of the reporting period. | Enter the total number of clients the entity conducts business with, that are relatives or close associates of PEPs, as at the end of the reporting period, broken down by the nationality of the client.  |
| 1.1.11 | 11 | Total number of Non-Compliant Accounts at the end of the reporting period.                                  | Enter the total number of customer accounts that remain non-compliant with required identification and verification procedures, that is, sufficient CDD documents has not been collected, as at the end of the reporting period.   |
| 1.2.1  | 12 | Clients/customers that are Legal Persons, broken down by country of incorporation of the client.            | <p>Enter the total number of clients that are Legal Persons, broken down by country of incorporation, as at the end of the reporting period.</p> <p>Examples of legal persons include, but are not limited to, Limited Liability Companies, Non-Resident Companies, and Foundation companies.</p> <p>If an entity does not have such clients, a '0' value should be used.</p>  |
| 1.2.2  | 13 | Clients/customers that are Legal Arrangements, broken down by country of establishment of the client.       | <p>Enter the total number of clients that are Legal Arrangements, broken down by the country of establishment of the client, as at the end of the reporting period.</p> <p>Examples of legal arrangements include but are not limited to Trusts and Partnerships.</p> <p>If an entity does not have such clients, a '0' value should be used.</p>  |
| 1.2.3  | 14 | Number of Transactions - Legal Persons  | Enter the total number of transactions processed for or on behalf of customers who are Legal Persons, during the reporting period.   |
| 1.2.4  | 15 | Number of Transactions - Legal Arrangements   | Enter the total number of transactions processed for or on behalf of clients who are Legal Arrangements, during the reporting period.  |

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| 1.2.5  | 16 | Value of Transactions – Legal Persons.  | Enter the total value of transactions processed for or on behalf of clients who are Legal Persons, during the reporting period.  |
| 1.2.6  | 17 | Value of Transactions - Legal Arrangements.   | Enter the total value of transactions processed for or on behalf of clients who are Legal Arrangements, during the reporting period.   |
| 1.2.7  | 18 | Total number of directors appointed to clients.   | Enter the total number of directors appointed to clients, as at the end of the reporting period.   |
| 1.2.8  | 19 | Number of clients that have a nominee appointed on behalf of a director, broken down by country of nationality of the director.           | Enter the total number of clients that have nominee directors appointed, as at the end of the reporting period, broken down by country of nationality of the director (not the nominee director).  |
| 1.2.9  | 20 | Number of clients that have a nominee appointed on behalf of a director, broken down by country of nationality of the nominated director. | Enter the total number of clients that have a nominee director as at the end of the reporting period, broken down by country of nationality of the nominated director.   |
| 1.2.10 | 21 | Number of directors and/or senior management of clients who are PEPs, broken down by nationality of the director / senior management.     | Enter the total number of directors and/or senior management of the clients who are PEPs, broken down by the nationality of the PEP, at the end of the reporting period.   |
| 1.2.11 | 22 | Number of directors and/or senior management of clients who are HNWIs.  | <p>Enter the number of directors and/or senior management of the clients who are HNWIs, at the end of the reporting period.</p> <p>HNWIs is specific to those persons whose net worth is approx. US\$1,000,000 or its equivalent in any other currency, or any person that has total assets of not less than approx. US\$5,000,000 or its equivalent in any other currency.</p> <p>HNWIs also include those clients who are Ultra HNWIs.</p> |
| 1.2.12 | 23 | Number of directors and/or senior management of clients who are Ultra HNWIs.  | <p>Enter the number of directors and/or senior management of the clients who are also Ultra HNWIs, at the end of the reporting period.</p> <p>UHNWIs is specific to those persons whose net worth is equal to or greater than US\$30,000,000.</p>  |
| 1.2.13 | 24 | Number of directors and/or senior management of clients who are PEPs & HNWIs.   | Enter the number of directors and/or senior management of the clients who are both PEPs and HNWIs / Ultra-HNWIs, at the end of the reporting period.   |
| 1.3.1  | 25 | Total number of BOs of clients who are Legal Persons or Arrangements.   | Enter the total number of BOs of all clients who are Legal Persons or Arrangements.  |

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|        |    |  | 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.  |
| 1.3.2  | 26 | Does the entity have any clients who are Legal Persons?              | Answer 'Yes' or 'No'  |
| 1.3.3  | 27 | Number of BOs of clients who are Legal Persons.                      | Enter the number of BOs of legal person clients, broken down by the nationality of the BO.  |
| 1.3.4  | 28 | Does the entity have any clients who are Legal Arrangements?         | Answer 'Yes' or 'No'  |
| 1.3.5  | 29 | 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.<br><br>This category is specific to clients who are legal arrangements and are Trusts.  |
| 1.3.6  | 30 | Number of Partners of clients who are Legal Arrangements.            | Enter the number of partners of legal arrangement clients, broken down by the nationality of the partner.   |
| 1.3.7  | 31 | Does the entity have any clients that have BOs who are HNWI's?       | Please answer 'Yes' or 'No'.<br><br>This category is specific to clients who are Legal Persons and Arrangements. Examples include but not limited to: instances where a BO of a LLC, Partners of a Partnership or Settlor of a Trust is a HNWI.<br><br>HNWIs is specific to those persons whose net worth is approx. US\$1,000,000 or its equivalent in any other currency, or any person that has total assets of not less than approx. US\$5,000,000 or its equivalent in any other currency.<br><br>HNWIs also include those clients who are Ultra HNWI's. |
| 1.3.8  | 32 | Number of Clients that have BOs - HNWI's.                            | Enter the total number of clients who have BOs that are also HNWI's.<br><br>If the entity does not have any clients that fit this category record a '0'.  |
| 1.3.9  | 33 | Does the entity have any clients that have BOs who are Ultra HNWI's? | Please answer 'Yes' or 'No'.<br><br>This category is specific to clients who are Legal Persons and Arrangements. Examples include, but not limited to, instances where a BO of a LLC, Partners of a Partnership or Settlor of a Trust is an UHNWI.<br><br>UHNWIs is specific to those persons whose net worth is equal to or greater than US\$30,000,000.   |
| 1.3.10 | 34 | Number of clients that have BOs - Ultra HNWI's.                      | Enter the total number of clients who have BOs that are also Ultra HNWI's.  |

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| 1.3.11 | 35 | Does the entity have any clients which have BOs that are PEPs?  | Please answer 'Yes' or 'No'.   |
| 1.3.12 | 36 | Number of clients that have BOs which are PEPs, broken down by nationality of the PEP.  | 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.   |
| 1.3.13 | 37 | Does the entity have any clients that have Nominees acting on behalf of a BO?   | Please answer 'Yes' or 'No'.<br>Please respond 'Yes' if there are any Nominees appointed within the ownership structure.   |
| 1.3.14 | 38 | Number of clients that have Nominees acting on behalf of a BO, or a Nominee within the ownership structure, broken down by nationality of the BO. | Enter the total number of clients that have nominees acting on behalf of beneficial owners, or within its ownership structure, broken down by nationality of the beneficial owner.<br><br>This category is specific to clients who are Legal Persons and Arrangements. |
| 1.4.1  | 39 | Does the entity have any clients that are Gov / Pub Sector?   | Please answer 'Yes' or 'No'.   |
| 1.4.2  | 40 | Gov / Pub Sector - Number of Clients, broken down by country of the government jurisdiction, during the reporting period.                         | Enter the number of clients the entity has, during the reporting period, that are a Government or Public Sector, broken down by government jurisdiction, during the reporting period.  |
| 1.4.3  | 41 | Gov / Pub Sector - Number of Transactions.  | Enter the number of transactions processed by clients that are Government or Public Sector, during the reporting period.   |
| 1.4.4  | 42 | Gov / Pub Sector - Value of Transactions for the reporting period.  | Enter the value of transactions processed for clients that are Government or Public Sector, during the reporting period.   |
| 1.4.5  | 43 | Does the entity have any clients that are NPOs?   | Please answer 'Yes' or 'No'.   |
| 1.4.6  | 44 | NPO - Number of Clients during the reporting period, broken down by country of incorporation of the client.                                       | Enter the number of NPO clients the entity has, during reporting period.   |
| 1.4.7  | 45 | NPO - Number of Transactions.   | Enter the number of transactions processed for clients that are NPOs, during the reporting period  |
| 1.4.8  | 46 | NPOs - Value of Transactions for the reporting period.  | Enter the value of transactions processed for clients that are NPOs, during the reporting period.  |
| 1.4.9  | 47 | Does the entity have any clients that are Foundations?  | Please answer 'Yes' or 'No'.   |

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| 1.4.10 | 48 | Foundations - Number of Clients, broken down by country of establishment of the client. | Enter the number of clients the entity had that are Foundations at the end of the reporting period, broken down by the country of establishment of the client. |
| 1.4.11 | 49 | Foundations - Number of Transactions.   | Enter the number of transactions conducted by clients that are a Foundation, during the reporting period.  |
| 1.4.12 | 50 | Foundations - Value of Transactions for the reporting period.                           | Enter the Value of Transactions processed for clients that are Foundations, during the reporting period.   |
| 1.4.13 | 51 | Does the entity have any clients that are Trusts?                                       | Please answer 'Yes' or 'No'.   |
| 1.4.14 | 52 | Trusts - Number of Clients, broken down by country of establishment of the client.      | Enter the number of clients the entity has that are Trusts, broken down by country of establishment, at the end of the reporting period.                       |
| 1.4.15 | 53 | Trusts - Number of Transactions.  | Enter the number of transactions conducted by clients that are Trusts, during the reporting period.  |
| 1.4.16 | 54 | Trusts - Value of Transactions for the reporting period.                                | Enter the Value of Transactions processed for clients that are Trusts, during the reporting period.  |
| 1.4.17 | 55 | Does the entity have any clients that are Segregated Portfolio Companies?               | Please answer 'Yes' or 'No'.<br><br>Note that one client can fall under multiple categories of structure.  |
| 1.4.18 | 56 | Segregated Portfolio Companies - Number of Clients.                                     | Enter the number of clients the entity has that are Segregated Portfolio Companies, at the end of the reporting period.  |
| 1.4.19 | 57 | Segregated Portfolio Companies - Number of Transactions.                                | Enter the number of transactions conducted by clients that are Segregated Portfolio Companies, during the reporting period.                                    |
| 1.4.20 | 58 | Segregated Portfolio Companies - Value of Transactions for the reporting period.        | Enter the value of transactions processed for clients that are Segregated Portfolio Companies, during the reporting period.                                    |
| 1.4.21 | 59 | Does the entity have any Special Economic Zone clients?                                 | Please answer 'Yes' or 'No'.<br><br>Note that one client can fall under multiple categories of structure.  |
| 1.4.22 | 60 | Special Economic Zone - Number of Clients.  | Enter the number of clients the entity has that are Special Economic Zone companies, at the end of the reporting period.                                       |

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| 1.4.23 | 61 | Special Economic Zone - Number of Transactions.  | Enter the number of transactions conducted by clients that are Special Economic Zone companies, during the reporting period.  |
| 1.4.24 | 62 | Special Economic Zone - Value of Transactions for the reporting period.                  | Enter the value of transactions processed for clients that are Special Economic Zone companies, during the reporting period.  |
| 1.4.25 | 63 | Does the entity have any clients that are Funds / Collective Investment Vehicles?        | Please answer 'Yes' or 'No'.<br><br>Note that one client can fall under multiple categories of structure.   |
| 1.4.26 | 64 | Funds / Collective Investment Vehicles - Number of Clients.                              | Enter the number of clients the entity has that are Funds / Collective Investment Vehicles, at the end of the reporting period.   |
| 1.4.27 | 65 | Funds / Collective Investment Vehicles - Number of Transactions.                         | Enter the number of transactions conducted by clients that are Funds / Collective Investment Vehicles, during the reporting period.   |
| 1.4.28 | 66 | Funds / Collective Investment Vehicles - Value of Transactions for the reporting period. | Enter the Value of Transactions processed during the reporting period, by clients that hold Funds / Collective Investment Vehicles  |
| 1.5.1  | 67 | Does the entity have any clients that are Natural Persons?                               | Please answer 'Yes' or 'No'.<br><br>This question <u>does not</u> apply to clients that Legal Persons or Arrangements -.  |
| 1.5.2  | 68 | Clients/customers that are Natural Persons, broken down by nationality of the client.    | Enter the number of clients that are Natural Persons (i.e individuals), subdivided by nationality, at the end of the reporting period.<br>This category is specific to clients who are Natural Persons and have a direct business relationship with the Entity. |
| 1.5.3  | 69 | Clients/Customers that are Natural Persons, broken down by Residency of the Client.      | Enter the number of clients that are Natural Persons, subdivided by residency, at the end of the reporting period.<br><br>This category is specific to clients who are Natural Persons and have a direct business relationship with the entity.                 |
| 1.5.4  | 70 | Total Transactions for clients who are Natural Persons.                                  | Enter the total number of transactions processed for clients, who are Natural Persons, during the reporting period.<br><br>This category is specific to clients who are Natural Persons and have a direct business relationship with the entity.                |
| 1.5.5  | 71 | Value of Transactions processed for clients who are Natural Persons.                     | Enter the total value of transactions processed for clients that are Natural Persons, during the reporting period.<br><br>This category is specific to clients who are Natural Persons and have a direct business relationship with the entity.                 |

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| 1.5.6  | 72 | Natural Persons - Does the entity have any clients that are PEPs?                 | Please answer 'Yes' or 'No'.  |
| 1.5.7  | 73 | Number of Natural Persons who are PEPs, broken down by nationality of the client. | Enter the number of clients the entity has that are Natural Persons who are also PEPs, at the end of the reporting period.  |
| 1.5.8  | 74 | Natural Persons - PEPs - Number of Transactions.                                  | Enter the number of transactions conducted by clients that are Natural Persons and also PEPs, during the reporting period.  |
| 1.5.9  | 75 | Natural Persons - PEPs - Value of Transactions for the reporting period.          | Enter the value of transactions processed for clients that are Natural Persons and also PEPs, during the reporting period.  |
| 1.5.10 | 76 | Does the entity have any Natural Person clients who are HNWIs?                    | Please answer 'Yes' or 'No'.<br><br>This category <u>does NOT include</u> those individuals who are Ultra HNWIs.  |
| 1.5.11 | 77 | Number of Natural Persons who are HNWIs.  | Enter the number of clients the entity has that are Natural Persons who are also HNWIs, at the end of the reporting period.<br><br>Do <u>NOT</u> include those individuals who are Ultra HNWIs. |
| 1.5.12 | 78 | Does the entity have any Natural Person clients who are PEPs and HNWIs?           | Please answer 'Yes' or 'No'.  |
| 1.5.13 | 79 | Number of Natural Persons who are PEPs & HNWIs.                                   | Enter the number of clients the entity has who are a combination of Natural Persons, PEPs, and HNWIs, at the end of the reporting period.   |
| 1.5.14 | 80 | Does the entity have any Natural Person clients who are Ultra HNWIs?              | Please answer 'Yes' or 'No'.<br><br>For this category, Ultra HNWIs are those persons with net worth equal to or greater than US\$30,000,000.  |
| 1.5.15 | 81 | Number of Natural Persons who are Ultra HNWIs.                                    | Enter the number of clients the entity has that are Natural Persons and also Ultra HNWIs, at the end of the reporting period.   |
| 1.5.16 | 82 | Does the entity have any Natural Person clients who are PEPs and Ultra HNWIs?     | Please answer 'Yes' or 'No'.  |
| 1.5.17 | 83 | Number of Natural Persons who are PEPs & Ultra HNWIs.                             | Enter the number of clients the entity has who are a combination of Natural Persons, PEPs, and Ultra HNWIs, at the end of the reporting period.   |
| 1.6.1  | 84 | <b>Nature of Business/Source of Funding:</b>                                      | Provide the total number of clients whose source of funding falls within the list of sectors.   |

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|        |    | <p>Enter the total number of clients whose source of funding falls within the list of sectors below.</p> <ul style="list-style-type: none"> <li>• Banking Institutions</li> <li>• Other Financial Regulated Business*</li> <li>• Financial Leasing</li> <li>• Money Lending</li> <li>• Accountants</li> <li>• Fintech</li> <li>• Civil Service Employment</li> </ul> <p>*excluding MSBs, VASPs, and TCSPs</p> |  |
| 1.6.2  | 85 | 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  | 86 | Banking Institutions - Number of Clients.   | Enter the number of clients the entity has, whose source of funding is from the banking sector.  |
| 1.6.4  | 87 | 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  | 88 | 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  | 89 | Does the entity have any clients whose source of funding is derived from Civil Service or Government Employment?  | Please answer 'Yes' or 'No'.   |
| 1.6.7  | 90 | Civil Service/ Government Employment- Number of Clients   | Enter the number of clients the entity has, whose source of funding is from civil service or government employment.                          |
| 1.6.8  | 91 | Does the entity have any clients whose source of funding is from Financial Leasing operations?  | Please answer 'Yes' or 'No'.   |
| 1.6.9  | 92 | Financial Leasing - Number of Clients.  | Enter the number of clients the entity has, whose source of funding is from Financial Leasing operations.                                    |
| 1.6.10 | 93 | Does the entity have any clients whose source of funding is from Money Lending operations?  | Please answer 'Yes' or 'No'.   |

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| 1.6.11 | 94  | Money Lending - Number of Clients.  | Enter the number of clients the entity has, whose source of funding is from Money Lending operations.  |
| 1.6.12 | 95  | 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'.   |
| 1.6.13 | 96  | 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 but not limited to the areas of: Audit, Assurance, Bookkeeping, and Insolvency). |
| 1.6.14 | 97  | Does the entity have any clients whose source of funding is from the Fintech industry?  | Please answer 'Yes' or 'No'.   |
| 1.6.15 | 98  | Fintech - Number of Clients.  | Enter the number of clients the entity has, whose source of funding is from the Fintech industry.  |
| 1.6.16 | 99  | <p>Nature of Business / Source of Funding:</p> <p>Enter the total number of clients whose source of funding falls within the list of sectors below.</p> <ul style="list-style-type: none"> <li>• Legal Practitioners</li> <li>• Dealers in Precious Metals and Stones</li> <li>• Money Services Business (MSBs)</li> <li>• Virtual Asset Service Providers (VASPs)</li> <li>• High Value Dealers</li> <li>• Trusts, Company Managers or Corporate Service Providers</li> <li>• Import/Export Industry</li> <li>• Shipping and Transport of Goods</li> </ul> | Provide the total number of clients whose source of funding falls within the list of sectors.  |
| 1.6.17 | 100 | Does the entity have any clients whose source of funds is derived from a Legal Practice / activities?   | Please answer 'Yes' or 'No'.   |
| 1.6.18 | 101 | Legal Practitioner - Number of Clients.   | Enter the number of clients the entity has, whose source of funding is derived from being a Legal practice / activities.   |
| 1.6.19 | 102 | Does the entity have any clients whose source of funds is derived   | Please answer 'Yes' or 'No'  |

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|        |     | from Dealers in Precious Metals and Stones operations?   |  |
| 1.6.20 | 103 | 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.               |
| 1.6.21 | 104 | Does the entity have any clients whose source of funds are derived from Money Services Business operations?                                | Please answer 'Yes' or 'No'.   |
| 1.6.22 | 105 | Money Services Business - Number of Clients.   | Enter the number of clients whose source of funds are derived from Money Services Business operations.   |
| 1.6.23 | 106 | Does the entity have any clients whose source of funds is derived from the virtual asset sector (products, services, investment activity)? | Please answer 'Yes' or 'No'.   |
| 1.6.24 | 107 | Virtual Asset Service Providers - 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). |
| 1.6.25 | 108 | Does the entity have any clients whose source of funds is derived through High Value Dealer operations?                                    | Please answer 'Yes' or 'No'.   |
| 1.6.26 | 109 | High Value Dealers - Number of Clients.  | Enter the number of clients whose source of funds is derived from High Value Dealer operations.  |
| 1.6.27 | 110 | Does the entity have any clients whose source of funds is derived from TCSP operations?  | Please answer 'Yes' or 'No'.   |
| 1.6.28 | 111 | TCSP operations - Number of Clients.   | Enter the number of clients the entity has, whose source of funds is derived from TCSP operations.   |
| 1.6.29 | 112 | Does the entity have any clients whose source of funds is derived from the Import / Export Industry?                                       | Please answer 'Yes' or 'No'.   |
| 1.6.30 | 113 | Import/ Export - Number of Clients.  | Enter the number of clients the entity has, whose source of funding is generated from operating in the Import / Export business.                 |
| 1.6.31 | 114 | 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'.   |

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| 1.6.32 | 115 | 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.           |
| 1.6.33 | 116 | <p>Nature of Business / Source of Funding:</p> <p>Enter the total number of clients whose source of funding falls within the list of sectors below.</p> <ul style="list-style-type: none"> <li>• Real Estate Agents/Brokers</li> <li>• Gambling Business</li> <li>• Adult Entertainment Industry</li> <li>• Defence Industry</li> <li>• Oil and Gas Industry</li> <li>• Mining</li> <li>• Construction / Development</li> <li>• Retail / Restaurant</li> <li>• Cannabis Industry</li> </ul> | Provide the total number of clients that fall within the list of the sectors.   |
| 1.6.34 | 117 | Does the entity have any clients whose source of funds is derived through the Real Estate industry (Agents / Brokers / sellers)?  | Please answer 'Yes' or 'No'.  |
| 1.6.35 | 118 | 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). |
| 1.6.36 | 119 | Does the entity have any clients whose source of funds is derived through the Gambling industry (including online gambling)?  | Please answer 'Yes' or 'No'.  |
| 1.6.37 | 120 | Gambling Industry (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).     |
| 1.6.38 | 121 | Does the entity have any clients whose source of funds is derived from the adult entertainment industry?  | Please answer 'Yes' or 'No'.  |
| 1.6.39 | 122 | Adult Entertainment - Number of Clients.  | Enter the number of clients the entity has, whose source of funds is derived from the Adult Entertainment Industry.                         |
| 1.6.40 | 123 | Does the entity have any clients whose source of funds is derived from the Defence Industry?  | Please answer 'Yes' or 'No'.  |

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| 1.6.41 | 124 | Defence Industry - Number of Clients.   | Enter the number of clients the entity has, whose source of funds is derived from the Defence industry.                                 |
| 1.6.42 | 125 | Does the entity have any clients whose source of funds is derived from operating in the Oil and Gas Industry?                   | Please answer 'Yes' or 'No'.  |
| 1.6.43 | 126 | 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.                |
| 1.6.44 | 127 | Does the entity have any clients whose source of funds is derived from the Mining Industry?                                     | Please answer 'Yes' or 'No'.  |
| 1.6.45 | 128 | Mining Industry - Number of Clients.  | Enter the number of clients the entity has whose source of funds is derived from the Mining Industry.                                   |
| 1.6.46 | 129 | Does the entity have any clients whose source of funds is derived through operating in the Construction / Development industry? | Please answer 'Yes' or 'No'.  |
| 1.6.47 | 130 | 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. |
| 1.6.48 | 131 | Does the entity have any clients whose source of funds is derived from operating in the Retail & Restaurant Business?           | Please answer 'Yes' or 'No'.  |
| 1.6.49 | 132 | 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.                     |
| 1.6.50 | 133 | Does the entity have any clients whose source of funds is derived through Cannabis Production & Distribution operations?        | Please answer 'Yes' or 'No'.  |
| 1.6.51 | 134 | Cannabis Production & Distribution - Number of Clients.   | Enter the number of clients whose source of funds is derived from Cannabis Production & Distribution operations.                        |
| 1.6.52 | 135 | Does the entity have any clients whose source of funds is Unknown to the entity?  | Please answer 'Yes' or 'No'.  |

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| 1.6.53 | 136 | Unknown Businesses and Professions - Number of Clients.   | Enter the number of clients the entity has whose source of funds is Unknown to the entity.<br><br>Unknown business and profession are where the entity does not know, and was not provided with, and was unable to verify the nature of business or profession (source of funds) of the client. |
| 1.6.54 | 137 | Does the entity have any clients whose business / Source of Funding is not listed in a category above?                      | Please answer 'Yes' or 'No'.  |
| 1.6.55 | 138 | Other - Not mentioned above - Number of Clients.  | Enter the number of clients the entity has, whose source of funds is a known business, however, not mentioned above.  |
| 1.6.56 | 139 | Please indicate the 'other' types of business/ source of funding not mentioned above.                                       | Enter all other types of business/ source of funding derived by clients, that are not mentioned above.  |
| 1.7.1  | 140 | Does the entity have any comments or feedback for this tab?   | Please select 'Yes' or 'No'.  |
| 1.7.2  | 141 | 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.   |
| 2.1.1  | 142 | Does the entity offer Custodian Services?   | Please answer 'Yes' or 'No'.  |
| 2.1.2  | 143 | Custodian Services - Number of Clients.   | Enter the number of clients that have been offered custodian services by the entity, at the end of the reporting period.  |
| 2.1.3  | 144 | Custodian Services - Number of Transactions   | Enter the number of transactions that the entity processed for clients that it offered custodian services to, during the reporting period.  |
| 2.1.4  | 145 | Custodian - Value of Fiat-Referenced Stablecoins (Virtual Assets) under Custody/ Administration by the geographic location. | Enter the value of fiat-referenced stablecoins under custody for clients, broken down by the geographic location of the custody arrangement, at the end of the report period.   |
| 2.1.5  | 146 | Custodian - Value of Virtual Assets/ Tokenised Assets under Custody/ Administration by geographic location.                 | Enter the value of virtual assets/ tokenised assets under custody for clients, broken down by the geographic location of the custody arrangement, at the end of the reporting period.   |
| 2.1.6  | 147 | Does the entity provide Trading Services?   | Please answer 'Yes' or 'No'.  |

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| 2.1.7  | 148 | Does the entity ensure the segregation of virtual assets and fiat funds for the clients under its custody? | Please answer 'Yes' or 'No'.  |
| 2.1.8  | 149 | Is the entity an Operator of a Virtual Asset Platform / Exchange?  | Please answer 'Yes' or 'No'.  |
| 2.1.9  | 150 | Does the entity allow/use privacy coins/anonymity-enhancing cryptocurrencies on the platform/exchange?     | Please answer 'Yes' or 'No'.  |
| 2.1.10 | 151 | VA Platform / Exchange - Number of Clients.  | Enter the number of clients the entity provided with the services as an operator of a Virtual Asset Platform / Exchange, during the reporting period. |
| 2.1.11 | 152 | VA Platform / Exchange - Number of Transactions.   | Enter the number of transactions that the entity processed as an operator of a Virtual Asset Platform / Exchange, during the reporting period.        |
| 2.1.12 | 153 | VA Platform / Exchange - Total Value of Transactions.  | Enter the total value of transactions that the entity processed as an operator of a Virtual Asset Platform / Exchange, during the reporting period.   |
| 2.2.1  | 154 | Is the entity an Issuer of Private VA Coins?   | Please answer 'Yes' or 'No'.  |
| 2.2.2  | 155 | Issuer Private VA Coins - Number of Clients.   | Enter the number of clients that were issued Private VA Coins by the entity, during the reporting period.   |
| 2.2.3  | 156 | Issuer of Private VA Coins - Number of Transactions.   | Enter the number of transactions the entity conducted, relating to issuance of Private VA Coins, during the reporting period.                         |
| 2.2.4  | 157 | Issuers of Private VA Coins and Tokens – Value of Transactions.  | Enter the value of transactions for Private VA Coins and Tokens issued during the reporting period.   |
| 2.2.5  | 158 | Is the entity an Issuer of Public VA Coins?  | Please answer 'Yes' or 'No'.  |
| 2.2.6  | 159 | Issuer of Public VA Coins - Number of Clients.   | Enter the number of clients that were issued with Public VA Coins by the entity, during the reporting period.   |
| 2.2.7  | 160 | Issuer of Public VA Coins - Number of Transactions.  | Enter the number of transactions the entity conducted, relating to issuance of Public VA Coins, during the reporting period.                          |

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| 2.2.8  | 161 | Issuers of Public VA Coins - Value of Transactions.                         | Enter the value of transaction from Public VA Coins issued by the entity, during the reporting period.  |
| 2.2.9  | 162 | Is the entity a Broker-Dealer of Virtual Assets?                            | Please answer 'Yes' or 'No'.  |
| 2.2.10 | 163 | Broker-Dealer of Virtual Assets - Number of Clients.                        | Enter the number of clients the entity provided the Broker-Dealer of VA Coins and Tokens services to, during the reporting period.                        |
| 2.2.11 | 164 | Broker-Dealer of Virtual Assets - Number of Transactions.                   | Enter the number of transactions the entity processed as a Broker-Dealer of VA Coins and Tokens, during the reporting period.                             |
| 2.2.12 | 165 | Broker-Dealer of Virtual Assets - Value of Transactions.                    | Enter the value of transactions relating to the services rendered by the entity as a Broker-Dealer of VA Coins and Tokens, during the reporting period.   |
| 2.2.13 | 166 | Does the entity service Clients as Market Maker for Virtual Assets?         | Please answer 'Yes' or 'No'.  |
| 2.2.14 | 167 | Market Maker for Virtual Assets - Number of Clients.                        | Enter the number of clients the entity acted as a Market Maker, during the reporting period.  |
| 2.2.15 | 168 | Does the entity service Clients as a Securities Advisor for Virtual Assets? | Please answer 'Yes' or 'No'.  |
| 2.2.16 | 169 | Securities Advisor for Virtual Assets - Number of Clients                   | Enter the number of clients the entity acted as an Advisor, during the reporting period.  |
| 2.2.17 | 170 | Does the entity service Clients as a Securities Manager of Virtual Assets?  | Please answer 'Yes' or 'No'.  |
| 2.2.18 | 171 | Securities Manager - Number of Clients.                                     | Enter the number of clients the entity acted as a Securities Manager for Virtual Assets, during the reporting period.                                     |
| 2.2.19 | 172 | Securities Manager - Number of Transactions.                                | Enter the number of transactions relating to the services rendered by the entity as a Securities Manager for Virtual Assets, during the reporting period. |
| 2.2.20 | 173 | Securities Manager – Value of Transactions.                                 | Enter the value of transactions relating to the services rendered by the entity as a Securities Manager for Virtual Assets, during the reporting period.  |
| 2.3.1  | 174 | Does the entity engage in Lending activities?                               | Please answer 'Yes' or 'No'.  |

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| 2.3.2  | 175 | Virtual Asset Lending - Number of Clients.   | Enter the number of clients the entity lent to, during the reporting period.   |
| 2.3.3  | 176 | Lending - Number of Transactions.  | Enter the number of lending transactions processed, during the reporting period.   |
| 2.3.4  | 177 | Lending - Value of Transactions.   | Enter the value of lending transactions processed, during the reporting period.  |
| 2.3.5  | 178 | Does the entity provide products / services to clients who are Funds registered in the Cayman Islands? | Please answer 'Yes' or 'No'.   |
| 2.3.6  | 179 | Number of Clients who are investment funds in the Cayman Islands.                                      | Enter the number of clients who are investment funds domiciled in the Cayman Islands during the reporting period.  |
| 2.3.7  | 180 | Value of Transactions for Cayman Islands Funds   | Enter the value of transactions processed with Cayman Islands Funds, during the reporting period.  |
| 2.3.8  | 181 | Does the entity provide other services not listed above?   | Please answer 'Yes' or 'No'.   |
| 2.3.9  | 182 | Other Investment Activities - Number of Clients.   | Enter the number of clients to which the entity provided other investment activities not listed above, during the reporting period.                              |
| 2.3.10 | 183 | Other Investment Activities - VA - Number of Transactions.   | Enter the number of transactions that the entity processed, during the reporting period, relating to other VA investment activities, which are not listed above. |
| 2.3.11 | 184 | Other Investment Activities - VA - Value of Transactions.  | Enter the total value of transactions relating to other VA investment activities, not listed above, which the entity provided during the reporting period.       |
| 2.3.12 | 185 | Indicate the types of 'Other Investment Activities'. Name all that apply.                              | List all other VA investment activities not listed above, which the entity offers.   |
| 2.4.1  | 186 | Does the entity conduct batch processing for client transactions?                                      | Please answer 'Yes' or 'No'.   |
| 2.4.2  | 187 | Batch Processing - Average Number of Clients processed within a week                                   | Enter the average number of clients processed by the entity each week, through Batch Processing of transactions.   |
| 2.4.3  | 188 | Batch Processing - Average Value of Transactions processed within a week.                              | Enter the average value of transactions processed within a week, using the Batch Processing of transactions method.  |
| 2.4.4  | 189 | Does the entity operate VA ATMs?   | Please answer 'Yes' or 'No'.   |

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| 2.4.5  | 190 | Number of VA ATMs, broken down by country of ATM location.   | Enter the number of VA Automated Teller Machines (ATMs) the entity has, broken down by country of location of the ATM.   |
| 2.4.6  | 191 | VA ATM Operator - Number of Transactions, broken down by the country of the ATM.                         | Enter the number of transactions conducted at the VA Automated Teller Machines (ATMs), during the reporting period, broken down by country of location of the ATM.                                 |
| 2.4.7  | 192 | VA ATM Operator - Value of Transactions, broken down by country of VA ATM.                               | Enter the value of transactions processed on the VA Automated Teller Machines (ATMs) during the reporting period, broken down by country of location of the ATM.                                   |
| 2.4.8  | 193 | Does the entity provide Mixers, Tumbler, Blenders, Foggers, or similar products and services to clients? | Please answer 'Yes' or 'No'.   |
| 2.4.9  | 194 | Mixer Products and Services - Number of Clients.   | Enter the number of clients where mixer products and services are applied.   |
| 2.4.10 | 195 | Mixer Products and Services - Number of Transactions.  | Enter the number of transactions conducted, during the reporting period, relating to Mixer Products and Services.  |
| 2.4.11 | 196 | Mixer Products and Services - Value of Transactions.   | Enter the total value of the transactions processed, during the reporting period, relating to Mixer Products and Services.   |
| 2.5.1  | 197 | Does the entity facilitate payments by clients in the form of Physical Cash?                             | Please answer 'Yes' or 'No'.   |
| 2.5.2  | 198 | Physical Cash - Number of Clients.   | Enter the number of clients that processed Physical Cash transactions, during the reporting period.  |
| 2.5.3  | 199 | Physical Cash - Number of Transactions.  | Enter the number of Physical Cash transactions processed during the reporting period.<br><br>Payments include those between the entity and the client and those conducted on behalf of the entity. |
| 2.5.4  | 200 | Physical Cash - Value of Funds Transferred.  | Enter the total value of funds transferred in the form of Physical Cash during the reporting period.   |
| 2.5.5  | 201 | Does the entity facilitate payments by clients in the form of Virtual Assets?                            | Please answer 'Yes' or 'No'.   |
| 2.5.6  | 202 | Virtual Assets - Number of Clients.  | Enter the number of clients that processed payments in the form of Virtual Assets during the reporting period.   |

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| 2.5.7  | 203 | Virtual Assets - Number of Transactions.                                      | Enter the number of Virtual Asset transactions the clients conducted, during the reporting period.  |
| 2.5.8  | 204 | Virtual Assets - Value of Transactions.                                       | Enter the value of funds transferred by clients using Virtual Assets during the reporting period.   |
| 2.5.9  | 205 | Does the entity facilitate payments by clients via Third Parties?             | Please answer 'Yes' or 'No'.  |
| 2.5.10 | 206 | Third Parties - Number of Clients.  | Enter the number of clients that conducted payments via Third Parties during the reporting period.<br><br>Payments via third party means that the payment was paid to a third party not associated with the business relationship or transaction. |
| 2.5.11 | 207 | Third Parties - Number of Transactions.                                       | Enter the number of Third-Party transactions conducted by clients during the reporting period.  |
| 2.5.12 | 208 | Third Parties - Value of Transactions.  | Enter the value of funds transferred by clients during the reporting period, using payments via Third Parties.  |
| 2.5.13 | 209 | Does the entity facilitate payments by clients via Credit / Debit Card?       | Please answer 'Yes' or 'No'.  |
| 2.5.14 | 210 | Credit/Debit Card Payments - Number of Clients                                | Enter the number of clients that made payments via credit/ debit card during the reporting period.  |
| 2.5.15 | 211 | Credit/Debit Card Payments - Number of Transactions.                          | Enter the number of transactions conducted by clients, during the reporting period, using credit/ debit cards.  |
| 2.5.16 | 212 | Credit/ Debit Card Payments - Value of Transactions.                          | Enter the value of transactions processed by clients, during the reporting period, using credit/ debit cards.   |
| 2.5.17 | 213 | Does the entity facilitate payments by clients in the form of Wire Transfers? | Please answer 'Yes' or 'No'.  |
| 2.5.18 | 214 | Wire Transfers - Number of Clients.   | Enter the number of clients that made payments in the form of Wire Transfers during the reporting period.   |
| 2.5.19 | 215 | Wire Transfers - Number of Transactions.                                      | Enter the number of Wire Transfer transactions conducted by clients, during the reporting period.   |

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| 2.5.20 | 216 | Wire Transfers - Value of Funds Transferred.   | Enter the value of funds wire transferred by clients during the reporting period.   |
| 2.5.21 | 217 | Does the entity facilitate payments by clients through the transfer of Virtual Assets?   | Please answer 'Yes' or 'No'.  |
| 2.5.22 | 218 | Transfer of Virtual Assets - Number of Clients.  | Enter the number of clients that made payments by way of transfer of Virtual Assets, during the reporting period.   |
| 2.5.23 | 219 | Transfer of Virtual Assets- Number of Transactions.  | Enter the number of transactions conducted by clients, during the reporting period, by way of transfer of Virtual Assets.   |
| 2.5.24 | 220 | Transfer of Virtual Assets - Value Transactions.   | Enter the value of funds transferred by clients during the reporting period, by way of transfer of Virtual Assets.  |
| 2.5.25 | 221 | Does the entity facilitate payments by clients in other forms not listed above?  | Please answer 'Yes' or 'No'.  |
| 2.5.26 | 222 | Other Forms of Payment - Number of Clients.  | Enter the number of clients that made payments using other forms of payment not listed above, during the reporting period.  |
| 2.5.27 | 223 | Other Forms of Payment - Number of Transactions.   | Enter the number of transactions conducted by clients during the reporting period, using other forms of payment other than the ones listed above.   |
| 2.2.28 | 224 | Other Forms of Payment - Value of Transactions.  | Enter the value of funds that were transferred by clients during the reporting period, using other forms of payments not listed above.  |
| 2.5.29 | 225 | Please indicate the types of Other Forms of Payment.   | List the Other Forms of Payment processed by clients during the reporting period, which are not listed above.   |
| 2.6.1  | 226 | Total value of all funds received, not only those relating to client funds, broken down by originating country of payment.           | Enter the total value of funds received by clients, on behalf of clients, or on behalf of the entity during the reporting period, broken down by the country where the funds originated.                        |
| 2.6.2  | 227 | Total number of transactions received, broken down by origin country of the transaction.   | Enter the total number of transactions, received during the reporting period, broken down by country of origin of the funds.  |
| 2.6.3  | 228 | Total value of all funds transferred out not only those relating to client funds, broken down by the country of payment destination. | Enter the total value of funds transferred out of the jurisdiction by clients, on behalf of clients, or on behalf of the entity during the reporting period, broken down by the country of payment destination. |

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| 2.6.4 | 229 | Total number of transactions transferred out, broken down by destination country of the transaction. | Enter the total number of outgoing transactions during the reporting period, broken down by destination country of the transaction.   |
| 2.7.1 | 230 | Does the entity have any comments or feedback for this tab?  | Please answer 'Yes' or 'No'.  |
| 2.7.2 | 231 | 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 | 232 | Total 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.   |
| 3.1.2 | 233 | Total number of Clients - Non-F2F.   | <p>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.</p> <p>Examples of Non-F2F include instances where the entity is onboarding clients through phone, email or online platform; however, they do not have F2F contact with the clients.</p>                     |
| 3.1.3 | 234 | Total number of clients via Online Platforms.  | Provide the total number of clients, in <u>the entity's entire portfolio</u> , that were onboarded via Online platforms, and not only those onboarded during the reporting period.  |
| 3.1.4 | 235 | Number of Clients through Referrals within Group - F2F during the reporting period.                  | <p>Enter the number of clients that were onboarded using referrals within Group - F2F during the reporting period.</p> <p>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.</p>   |
| 3.1.5 | 236 | Number of Clients through referrals within Group - Non-F2F   | <p>Enter the number of clients that were onboarded using referrals within Group and via Non – Face to Face Channels for the reporting period, broken down by nationality of the BOs.</p> <p>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.</p> |

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| 3.1.6  | 237 | Total number of Clients onboarded through Eligible Introducers (EI).  | 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.   |
| 3.1.7  | 238 | Number of Clients onboarded through Eligible Introducers (EI) during the reporting period broken down by nationality of the BO. | Enter the number of -clients that were onboarded through Eligible Introducers, during the reporting period, broken down by the nationality of the BO.  |
| 3.1.8  | 239 | Clients onboarded via Online Platforms during the reporting period, broken down by nationality of the BO.                       | Enter the number of clients onboarded using online platforms during the reporting period, broken down by nationality of the BO.  |
| 3.1.9  | 240 | Provide the percentage of client assets held in hot wallets.  | Enter the percentage of clients' assets held in hot wallets as at the end of the reporting period.   |
| 3.1.10 | 241 | Provide the percentage of client assets held in cold wallets.   | Enter the percentage of clients' assets held in cold wallets as at the end of the reporting period   |
| 3.1.11 | 242 | Does the entity utilise blockchain analytics software to screen clients at onboarding?  | Select option which best applies:<br>'Yes', 'No', or 'Not Applicable'  |
| 3.2.1  | 243 | Has the entity outsourced the role of AML Compliance Officer within the reporting period?                                       | Please answer 'Yes' or 'No'.   |
| 3.2.2  | 244 | 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: <ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> Select "3rd Party and Member within Group", in cases where the AML Compliance Officer turnover includes one of each within the reporting period. |
| 3.2.3  | 245 | 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.   |

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| 3.2.4  | 246 | How many AML Compliance Officers did the entity have in the past 3 years?  | If there was no turnover of the AML Compliance Officer role in the three-year period, answer "1".  |
| 3.2.5  | 247 | Has the entity outsourced the role of Money Laundering Reporting Officer within the reporting period?                  | Please answer 'Yes' or 'No'.   |
| 3.2.6  | 248 | To whom has the Money Laundering Reporting Officer role been outsourced?   | <p>If outsourced, 'select' the status that best describes the outsource relationship for the Money Laundering Reporting Officer:</p> <ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> <p>Select "3rd Party and Member within Group", in cases where the Money Laundering Reporting Officer turnover includes one of each within the reporting period.</p>               |
| 3.2.7  | 249 | 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  | 250 | How many Money Laundering Reporting Officers did the entity have in the past 3 years?                                  | If there was no turnover of the Money Laundering Reporting Officer role in the three-year period, answer "1".  |
| 3.2.9  | 251 | Has the entity outsourced the role of Deputy Money Laundering Reporting Officer within the reporting period?           | Please answer 'Yes' or 'No'.   |
| 3.2.10 | 252 | To whom has the Deputy Money Laundering Reporting Officer role been outsourced?  | <p>If outsourced, 'select' the status that best describes the outsource relationship for the Deputy Money Laundering Reporting Officer:</p> <ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> <p>Select "3rd Party and Member within Group", in cases where the Deputy Money Laundering Reporting Officer turnover includes one of each within the reporting period.</p> |
| 3.2.11 | 253 | What was the country of residency of the Deputy Money Laundering Reporting Officer at the end of the reporting period? | Enter the country of residence of the Deputy Money Laundering Reporting Officer at the end of the reporting period.  |
| 3.2.12 | 254 | How many Deputy Money Laundering Reporting Officers did the entity have in the past 3 years?                           | If there was no turnover of the Deputy Money Laundering Reporting Officer role in the three-year period, answer "1".   |

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| 3.2.13 | 255 | Has the entity outsourced the function of Targeted Financial Sanction (TFS) screening within the reporting period?         | Please answer 'Yes' or 'No'.   |
| 3.2.14 | 256 | To whom has the Targeted Financial Sanction screening function been outsourced?  | <p>Select one of the following options which best describes the outsource relationship for the screening of Targeted Financial Sanctions:</p> <ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> <p>Select "3rd Party and Member within Group", in cases where the screening of Targeted Financial Sanctions turnover includes one of each within the reporting period.</p> |
| 3.2.15 | 257 | What was the outsourcing country of the Targeted Financial Sanction screening function at the end of the reporting period? | Enter the country that the entity outsourced the Targeted Financial Sanction screening function to, during the reporting period.   |
| 3.2.16 | 258 | How many TFS screening platforms have the entity had in the past three years?  | If there no turnover of the Targeted Financial Sanction screening function in the three-year period, answer "1".   |
| 3.2.17 | 259 | Has the entity outsourced the function of Transaction Monitoring within the reporting period?                              | Please answer 'Yes' or 'No'.   |
| 3.2.18 | 260 | To whom has the Transaction Monitoring function been outsourced?   | <p>Select one of the following options which best describes the outsourced Transaction Monitoring relationship:</p> <ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> <p>Select "3rd Party and Member within Group", in cases where the Transaction Monitoring services turnover includes one of each within the reporting period.</p>                                     |
| 3.2.19 | 261 | 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.  |
| 3.3.1  | 262 | Does the entity outsource custody of virtual assets and fiat funds to a third-party custodian?                             | Please answer 'Yes' or 'No'.   |
| 3.3.2  | 263 | To whom has the custody function been outsourced?  | Select one of the following options which best describes the outsourced Custodian Services relationship:   |

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|        |     |   | <ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> </ul> 3 <sup>rd</sup> Party   |
| 3.3.3  | 264 | What was the outsourcing country of the Custody function at the end of the reporting period?            | Select the country where the entity's Custodian Services have been outsourced.  |
| 3.3.4  | 265 | Has the entity outsourced the function of Trading Platform within the reporting period?                 | Please answer 'Yes' or 'No'.  |
| 3.3.5  | 266 | To whom has the Trading Platform function been outsourced?  | <p>Select one of the following options which best describes the outsourced relationship for the Trading platform:</p> <ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> <p>Select "3<sup>rd</sup> Party and Member within Group", in cases where the Trading platform turnover includes one of each within the reporting period.</p>            |
| 3.3.6  | 267 | 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.   |
| 3.3.7  | 268 | Has the entity outsourced the function of Liquidity platforms within the reporting period?              | Please answer 'Yes' or 'No'.  |
| 3.3.8  | 269 | To whom has the Liquidity platform function been outsourced?  | <p>Select one of the following options which best describes the outsource relationship for the Liquidity platform:</p> <ul style="list-style-type: none"> <li>• Member within Group</li> <li>• 3<sup>rd</sup> Party and Member within Group</li> <li>• 3<sup>rd</sup> Party</li> </ul> <p>Select "3<sup>rd</sup> Party and Member within Group", in cases where of the Liquidity platform turnover that includes one of each within the reporting period.</p> |
| 3.3.9  | 270 | 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.   |
| 3.3.10 | 271 | Did the entity engage in Margin Trading during the reporting period?                                    | Please answer 'Yes' or 'No'.  |

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| 3.3.11 | 272 | Number of Margin Trading Transactions.  | Enter the number of Margin Trading transactions the entity processed , during the reporting period.   |
| 3.3.12 | 273 | Value of funds borrowed by the entity for Margin Trading, broken down by borrowing country.                         | Enter the Value of funds borrowed by the entity during the reporting period, for Margin Trading transactions, broken down by borrowing country  |
| 3.4.1  | 274 | Where is the entity's physical place of business?   | Select the country of the entity's physical business operations.  |
| 3.4.2  | 275 | Is the entity part of a group structure?  | <ul style="list-style-type: none"> <li>Please answer 'Yes' or 'No'.</li> </ul>  |
| 3.4.3  | 276 | In which country is the Parent or Holding Company incorporated?   | <p>Enter the country of incorporation for the Parent or Holding Company.</p> <p>This refers to the jurisdiction where the company was legally incorporated, which may differ from the location of its headquarters.</p>                         |
| 3.4.4  | 277 | 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.   |
| 3.4.5  | 278 | 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.   |
| 3.4.6  | 279 | In which countries, by percentage of equity ownership, are all Shareholders of the entity located?                  | <p>Enter the countries where all shareholders of the entity are located and their percentage of equity ownership.</p> <p>For publicly listed entities please list beneficial ownership of 10% or more.</p>                                      |
| 3.4.7  | 280 | Percentage of controlling interests in the entity, broken down by country of location of the controlling interests. | <p>Insert countries where persons or beneficial owners who control the entity are located, and their percentage of Controlling Interest in the entity.</p> <p>For publicly listed entities please list beneficial ownership of 10% or more.</p> |
| 3.4.8  | 281 | Does the entity have any licence or registration in another jurisdiction?   | Please answer 'Yes' or 'No'.  |
| 3.4.9  | 282 | Did the entity receive any penalty or other enforcement action in another jurisdiction(s)?                          | Please answer 'Yes' or 'No'.  |
| 3.4.10 | 283 | List the jurisdiction(s) in which enforcement action was taken. If none, use '0' to indicate none.                  | <p>Enter the name(s) of the jurisdiction(s) in which enforcement action was taken, if any.</p> <p>If none, use '0' to indicate none.</p>  |

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| 3.4.11 | 284 | Does the entity operate in the Cayman Islands Special Economic Zone (SEZ)?   | Please answer 'Yes' or 'No'.   |
| 3.4.12 | 285 | Does the entity hold a Controlling Interest in another legal person or legal arrangement engaged in Virtual Asset products or services?                      | Please answer 'Yes' or 'No'.   |
| 3.4.13 | 286 | List the jurisdiction(s) where the entity holds a Controlling Interest in another legal person or arrangement engaged in Virtual Asset products or services. | Enter the name(s) of the jurisdiction(s) where the entity holds a Controlling Interest in another legal person or arrangement engaged in Virtual Asset products or services.<br>If none, use '0' to indicate none. |
| 3.5.1  | 287 | Does the entity have comments or feedback for this tab?  | Please answer 'Yes' or 'No'.   |
| 3.5.2  | 288 | 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.<br>Please enter 'N/A' if no comment.   |

**AML Controls Questions:**

| No.   | Question No. | Question   | Description/Explanation                  |
|-------|--------------|--|--|
| 1.1.1 | 289          | Does the Governing Body receive comprehensive reports, information and statistics regarding ML/TF/PF and Sanctions risks and issues? | Please answer 'Yes' or 'No'.             |
| 1.1.2 | 290          | Does the Governing Body review all AML/CFT/CPF and Sanctions related policies and procedures periodically?                           | Please answer 'Yes' or 'No'.             |
| 1.1.3 | 291          | What is the frequency, in months, that AML/CFT/CPF and Sanctions matters are reported to the Board?                                  | Enter the frequency in number of months. |
| 1.1.4 | 292          | Is there an audit risk and compliance subcommittee?  | Please answer 'Yes' or 'No'.             |
| 1.1.5 | 293          | Is there an approved Charter for the Governing Body and Sub-Committees?  | Please answer 'Yes' or 'No'.             |
| 1.1.6 | 294          | Is the entity subject to group wide governance practices?  | Please answer 'Yes' or 'No'.             |

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| 1.1.7  | 295 | Is there a documented ML/TF/PF/Sanctions risk assessment framework approved by the Governing Body?   | Please answer 'Yes' or 'No'.  |
| 1.1.8  | 296 | Is AML/CFT/CPF, including regulatory audit findings, a standard agenda item at Board/Principal and/or Board committee meetings?  | Please answer 'Yes' or 'No'.  |
| 1.1.9  | 297 | Does the Board / Governing Body ensure that recommendations made by the internal and external auditors and regulators to address AML/CFT/CPF and Sanctions findings are acted upon in a timely manner? | Please answer 'Yes' or 'No'.  |
| 1.1.10 | 298 | Has the entity, or its Directors, Shareholders, Beneficial Owners, or Senior Officers been denied an application by any Regulatory Body?   | Please answer 'Yes' or 'No'.  |
| 1.1.11 | 299 | Provide the country of jurisdiction.   | Enter the names of the jurisdiction(s) in which the entity, or its Directors, Shareholders, Beneficial Owners or Senior Officers were denied an application by any regulatory body. |
| 1.1.12 | 300 | Are any of the entity's AML Officers, Shareholders, Beneficial Owners, Directors, or Senior Management PEPs?   | Please answer 'Yes' or 'No'.  |
| 1.1.13 | 301 | Does the Board ensure that the AMLCO/MLRO/DMLRO receive the appropriate training?  | Please answer 'Yes' or 'No'.  |
| 1.2.1  | 302 | Has an AMLCO been appointed?   | Please answer 'Yes' or 'No'.  |
| 1.2.2  | 303 | Has an MLRO been appointed?  | Please answer 'Yes' or 'No'.  |
| 1.2.3  | 304 | Is a Deputy MLRO appointed?  | Please answer 'Yes' or 'No'.  |
| 1.2.4  | 305 | Is the AMLCO employed at a managerial level of the company?  | Please answer 'Yes' or 'No'.  |
| 1.2.5  | 306 | For reporting lines, does the AMLCO report to the Governing Body?  | Please answer 'Yes' or 'No'.  |
| 1.2.6  | 307 | Does the AMLCO maintain independence from revenues related / client facing activities?   | Please answer 'Yes' or 'No'.  |

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| 1.2.7  | 308 | Does the AMLCO have sufficient compliance/AML skills and experience to perform their function?   | Please answer 'Yes' or 'No'. |
| 1.2.8  | 309 | Does the AMLCO report to the Board on AML/CFT/CPF and Sanctions related issues and on the adequacy of the AML/CFT/CPF and Sanctions framework?         | Please answer 'Yes' or 'No'. |
| 1.2.9  | 310 | Does the AMLCO conduct any sample testing and review any exception reports to identify potential AML/CFT/CPF and Sanctions compliance breaches?        | Please answer 'Yes' or 'No'. |
| 1.2.10 | 311 | Does the AMLCO provide oversight of the AML/CFT/CPF and Sanctions risk assessment framework and procedures?  | Please answer 'Yes' or 'No'. |
| 1.2.11 | 312 | Does the MLRO maintain independence from revenues related / client facing activities?  | Please answer 'Yes' or 'No'. |
| 1.2.12 | 313 | Does the MLRO report to the Board on AML/CFT/CPF and Sanctions related issues and on the adequacy of the AML/CFT/CPF and Sanctions framework?          | Please answer 'Yes' or 'No'. |
| 1.3.1  | 314 | Has the entity developed and implemented AML/CFT/CPF and Sanctions training and awareness programme?   | Please answer 'Yes' or 'No'. |
| 1.3.2  | 315 | Have the Directors received AML/CFT/CPF and Sanctions training during the reporting period?  | Please answer 'Yes' or 'No'. |
| 1.3.3  | 316 | Has the AML Compliance Officer received specialized compliance/AML/CFT/CPF and Sanctions training over the last year relevant to the current position? | Please answer 'Yes' or 'No'. |
| 1.3.4  | 317 | Has the MLRO received specialized compliance/AML/CFT/CPF and Sanctions training over the last year relevant to the current position?                   | Please answer 'Yes' or 'No'. |

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| 1.3.5  | 318 | Has the DMLRO received specialized AML/CFT/CPF and Sanctions training over the last year relevant to the current position?                                 | Please answer 'Yes' or 'No'.   |
| 1.3.6  | 319 | Does the AMLCO ensure that ongoing training programs are kept up to date and relevant?   | Please answer 'Yes' or 'No'.   |
| 1.3.7  | 320 | Are changes to policy and procedures communicated to all Staff/Directors and Senior Management?  | Please answer 'Yes' or 'No'.   |
| 1.3.8  | 321 | Does the entity assess AML/CFT/CPF and Sanctions knowledge of its employees?   | Please answer 'Yes' or 'No'.   |
| 1.3.9  | 322 | What percentage of employees/agents/directors that have NOT been exposed to AML/CFT/CPF and Sanctions training by the company during the reporting period? | Enter the percentage of employees/ agents/ directors that have NOT been exposed to AML/CFT/CPF and Sanctions training by the entity during the reporting period. |
| 1.3.10 | 323 | Does the AMLCO organize or ensure AML/CFT/CPF and Sanctions training is conducted for all staff annually?  | Please answer 'Yes' or 'No'.   |
| 1.4.1  | 324 | Does the entity have an Internal Audit Department / Unit / Function with oversight over AML functions?   | Please answer 'Yes' or 'No'.   |
| 1.4.2  | 325 | Is there a developed Internal Audit plan, with focus on AML/CFT/CPF and Sanctions?   | Please answer 'Yes' or 'No'.   |
| 1.4.3  | 326 | Is the Internal Audit plan approved by the Board?  | Please answer 'Yes' or 'No'.   |
| 1.4.4  | 327 | Does the Internal AML audit include reviews of the AML/CFT/CPF and Sanctions related policies, procedures and processes?                                   | Please answer 'Yes' or 'No'.   |
| 1.4.5  | 328 | Has the AML audit function performed an AML/CFT/CPF and Sanctions audit and issued a report for conclusions and recommendations?                           | Please answer 'Yes' or 'No'.   |

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| 1.4.6  | 329 | What is the frequency, in months, of the internal AML audit for the AML/CFT/CPF and Sanctions Programme?   | Enter the frequency, in months, of how often an internal AML audit for the AML/CFT/CPF and Sanctions programme is conducted. |
| 1.4.7  | 330 | Does the Board review the AML audit program?   | Please answer 'Yes' or 'No'.   |
| 1.4.8  | 331 | What is the frequency, in months, of the Board review of the AML audit program?  | Enter the frequency, in months, of the Board review of the AML audit program.  |
| 1.4.9  | 332 | Where applicable, does the internal audit include testing on functions which are outsourced?   | Please select 'Yes', 'No', or 'Not Applicable'.  |
| 1.4.10 | 333 | Where applicable, does the internal audit include testing of EI relationships?   | Please enter Yes, No, or Not Applicable.   |
| 1.4.11 | 334 | Does the Internal Audit include testing for the AML/CFT/CPF and Sanctions training function?   | Please answer 'Yes' or 'No'.   |
| 1.4.12 | 335 | Does the Internal Audit include testing for the entity's TFS and PF controls?  | Please answer 'Yes' or 'No'.   |
| 1.5.1  | 336 | Does the entity conduct a business risk assessment which considers ML/TF/PF and Sanctions risk factors?  | Please answer 'Yes' or 'No'.   |
| 1.5.2  | 337 | Does the entity employ a Risk Based Methodology when assessing and allocating oversight of its clients?  | Please answer 'Yes' or 'No'.   |
| 1.5.3  | 338 | Does the entity consider the ML/TF/PF and Sanctions risks of clients (including BOs), in their risk assessment?  | Please answer 'Yes' or 'No'.   |
| 1.5.4  | 339 | Does the entity consider the ML/TF/PF and Sanctions risks relating to geographic location (also of counterparties and affiliates, branches, subsidiaries etc.) in their risk assessment? | Please answer 'Yes' or 'No'.   |
| 1.5.5  | 340 | Does the entity consider the ML/TF/PF and Sanctions risks associated with products and services (existing and new) in their risk assessment?   | Please answer 'Yes' or 'No'.   |

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| 1.5.6  | 341 | Does the entity consider the ML/TF/PF and Sanctions risks associated with delivery channels (existing and new) in their risk assessment?   | Please answer 'Yes' or 'No'.  |
| 1.5.7  | 342 | Does the entity ensure ML/TF/PF and Sanctions business risk assessments are done / updated prior to the launch of any new products/services/delivery channels/technologies?                            | Please answer 'Yes' or 'No'.  |
| 1.5.8  | 343 | Does the entity consider the ML/TF/PF and Sanctions risks associated with technology (existing and new) in their risk assessment?  | Please answer 'Yes' or 'No'.  |
| 1.5.9  | 344 | Does the entity consider Sanctions risk factors in their risk assessment?  | Please answer 'Yes' or 'No'.  |
| 1.5.10 | 345 | Does the entity consider PF risk factors in their risk assessment?   | Please answer 'Yes' or 'No'.  |
| 1.5.11 | 346 | Does the entity consider outsourcing risk factors in its risk assessment?  | Please answer 'Yes' or 'No'.  |
| 1.5.12 | 347 | Does the entity take their nature, size and complexity into consideration and consider the need for other risk factors, other than those listed above, when developing their business risk assessment? | Please answer 'Yes' or 'No'.  |
| 1.5.13 | 348 | How often, in months, do you review High-Risk relationships/accounts?  | Please respond using the following:<br>Never, More than 18 months, 7 – 12 months, 1 – 6 months. |
| 1.5.14 | 349 | How often, in months, do you review Medium-Risk relationships/accounts?  | Please respond using the following:<br>Never, More than 18 months, 7 – 12 months, 1 – 6 months. |
| 1.5.15 | 350 | How often, in months, do you review Low-Risk relationships/accounts?   | Please respond using the following:<br>Never, More than 18 months, 7 – 12 months, 1 – 6 months. |
| 1.6.1  | 351 | Does the entity rely on Group AML/CFT policies and procedures?   | Please answer 'Yes' or 'No'.  |

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| 1.6.2  | 352 | If yes, has the entity conducted a GAP Analysis to identify whether the AML/CFT programme complies with Cayman's legislation and regulatory framework?                          | Please answer 'Yes' or 'No'. |
| 1.6.3  | 353 | Has the Board, or Governing Body, ensured that necessary amendments are made to the entity's policies and procedures for alignment with the requirements in the Cayman Islands? | Please answer 'Yes' or 'No'. |
| 1.6.4  | 354 | Does the entity have Board, or Governing Body, approved policies and procedures for Customer Due Diligence measures i.e. customer identification and verification?              | Please answer 'Yes' or 'No'. |
| 1.6.5  | 355 | Does the entity have Board, or Governing Body, approved policies and procedures for identification of high-risk customers inc. PEPs?  | Please answer 'Yes' or 'No'. |
| 1.6.6  | 356 | Does the entity have Board, or Governing Body, approved policies and procedures for establishing Source of Funds?   | Please answer 'Yes' or 'No'. |
| 1.6.7  | 357 | Does the entity have Board, or Governing Body, approved policies and procedures for employee screening?   | Please answer 'Yes' or 'No'. |
| 1.6.8  | 358 | Does the entity have Board or Governing Body approved policies and procedures for training of staff?  | Please answer 'Yes' or 'No'. |
| 1.6.9  | 359 | Does the entity have Board or Governing Body approved policies and procedures for ensuring confidential sharing and preservation of data within the group?                      | Please answer 'Yes' or 'No'. |
| 1.6.10 | 360 | Does the entity have policies and procedures on collecting due diligence on counterparties and business associates?   | Please answer 'Yes' or 'No'. |
| 1.6.11 | 361 | Does the entity have procedures for declining, de-risking,  | Please answer 'Yes' or 'No'. |

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|        |     | terminating or restricting business relationships due to AML/CFT/CPF and Sanctions related reasons?  |  |
| 1.6.12 | 362 | Enter the total number of business relationships or clients' accounts that were de-risked /declined /terminated/restricted due to AML/CFT/CPF and Sanctions concerns for the reporting period. | Enter the total number of client accounts that were declined, terminated, or restricted due to AML/CFT/CPF and Sanctions concerns. |
| 1.7.1  | 363 | Does the entity have a Sanctions screening process including policies and procedures?  | Please answer 'Yes' or 'No'.   |
| 1.7.2  | 364 | Is the screening process manual, automated or a combination?   | Select which best applies: Manual, Automated, or Automated with Manual Checks.   |
| 1.7.3  | 365 | Is the screening process fully or partially outsourced?  | Please select 'Fully' or 'Partially'.  |
| 1.7.4  | 366 | When designated lists are updated, does the screening process reflect these updates within 24 hours?   | Please answer 'Yes' or 'No'.   |
| 1.7.5  | 367 | Is sanctions monitoring done in real time or after the event?  | Select what applies:<br>'No process', 'After the event', or 'Real time'.   |
| 1.7.6  | 368 | Is the customer and counterparty database screened against the designated H.M. Treasury list?  | Please answer 'Yes' or 'No'.   |
| 1.7.7  | 369 | Are procedures in place to ensure customers / counterparties are screened prior to payouts (remittance of funds)?  | Please answer 'Yes' or 'No'.   |
| 1.7.8  | 370 | Does the entity have Asset Freeze procedures?  | Please answer 'Yes' or 'No'.   |
| 1.7.9  | 371 | Have assets of any customers been identified as persons or entities designated by the OFSI or OFAC?  | Please answer 'Yes' or 'No'.   |
| 1.7.10 | 372 | Does the entity maintain a report of results of alerts, methodology of clearing alerts, and those positive matches resulting from sanction screening?  | Please answer 'Yes' or 'No'.   |
| 1.7.11 | 373 | Does the entity have systems and procedures in place to determine whether the entity or any of its affiliates, subsidiaries or   | Please answer 'Yes' or 'No'.   |

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|        |     | counterparties is located within or operating from any country/jurisdiction that is subject to economic or financial sanctions?   |                              |
| 1.7.12 | 374 | Does the entity have systems and procedures in place to determine whether the entity or any of its affiliates, subsidiaries or counterparties is engaged in transactions, investments, business or other dealings that directly or indirectly involve or benefit any country/jurisdiction that is subject to economic or financial sanctions? | Please answer 'Yes' or 'No'. |
| 1.7.13 | 375 | Does the entity have policies and procedures in place to ensure transactions conducted with customers / counterparties of countries surrounding sanctioned jurisdictions are scrutinized to ensure the unlisted countries are not being used as conduits to evade targeted financial sanctions and proliferation alerts / risks?              | Please answer 'Yes' or 'No'. |
| 1.8.1  | 376 | Does the entity have transaction monitoring policies and procedures developed that commensurate to its operations?  | Please answer 'Yes' or 'No'. |
| 1.8.2  | 377 | Does the entity have policies and procedures for restricting or flagging transactions (including international wire transfers, manager's drafts, and trade finance transactions) with countries where there are sanctions imposed or those that have been identified as having TF/PF deficiencies?  | Please answer 'Yes' or 'No'. |
| 1.8.3  | 378 | Does the entity have in place an automated system for monitoring transactions for potential suspicion and reporting suspicious transactions?  | Please answer 'Yes' or 'No'. |
| 1.8.4  | 379 | Is there a requirement for senior management approval before establishing high risk business relationships i.e. with PEPs?  | Please answer 'Yes' or 'No'. |

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| 1.8.5 | 380 | Does the entity have EDD procedures?   | Please answer 'Yes' or 'No'.  |
| 1.8.6 | 381 | Does the entity apply EDD on customers and counterparties based in higher-risk countries?  | Please answer 'Yes' or 'No'.  |
| 1.8.7 | 382 | Where high risk clients are identified, did the entity conduct EDD measures for every transaction carried out by such customers?   | Please answer 'Yes' or 'No'.  |
| 1.8.8 | 383 | Enter the total number of Alerts resulting in Suspicious Activity Reports related to ML/TF/PF and Sanctions matters identified during transaction monitoring.                      | The total number of alerts produced through transaction monitoring which resulted in the escalation of an internal SAR. |
| 1.9.1 | 384 | Does the entity have Internal Reporting policies and procedures i.e. Identification and Reporting of Suspicious Activities and Transactions to the MLRO?                           | Please answer 'Yes' or 'No'.  |
| 1.9.2 | 385 | Does the entity's policies and procedures identify the MLRO and how to make a filing to them?  | Please answer 'Yes' or 'No'.  |
| 1.9.3 | 386 | Does the entity have policies and procedures for reporting to the FRA?   | Please answer 'Yes' or 'No'.  |
| 1.9.4 | 387 | How many internal Suspicious Activity/Transaction Reports have been reported to the MLRO for the current reporting period?   | Enter the number of internal Suspicious Activity/Transaction Reports reported to the MLRO during the reporting period.  |
| 1.9.5 | 388 | How many Suspicious Activity Reports have been reported, to the FRA, by the MLRO for the current reporting period?   | Enter the number of external Suspicious Activity Reports filed by the MLRO, to the FRA, during the reporting period.    |
| 1.9.6 | 389 | How many hours on average does it take to file a SAR to the FRA?   | Enter the number of hours (average) the entity takes to file a Suspicious Activity/Transaction Report to the FRA.       |
| 1.9.7 | 390 | Has the entity been requested by law enforcement agencies or the courts to provide any information relating to its customers, business activities, directors or senior management? | Please answer 'Yes' or 'No'.  |

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| 1.9.8  | 391 | Has the entity been penalized or received a warning for non-compliance, from the FRA?                   | Please answer 'Yes' or 'No'.   |
| 1.9.9  | 392 | Does the entity maintain a log identifying all internal SARs filed to the MLRO along with their status? | Please answer 'Yes' or 'No'.   |
| 1.9.10 | 393 | Does the entity maintain a log identifying all SARs filed to the FRA along with their status?           | Please answer 'Yes' or 'No'.   |
| 1.9.11 | 394 | If the MLRO decides not to file a SAR to the FRA is the reason for not filing documented?               | Please answer 'Yes' or 'No'.   |
| 1.10.1 | 395 | Does the entity maintain Record Keeping Procedures?   | Please answer 'Yes' or 'No'.   |
| 1.10.2 | 396 | How many years after the end of the business relationship are records retained?                         | Enter the number of years  |
| 1.10.3 | 397 | Are any records retained and accessible in the Cayman Islands?  | Please answer 'Yes' or 'No'.   |
| 1.10.4 | 398 | How accessible and swiftly available are records for competent authorities - in hours?                  | Enter the average time to comply in hours.   |
| 1.10.5 | 399 | Does the entity maintain a declined business log?   | Please answer 'Yes' or 'No'.   |
| 1.10.6 | 400 | Does the entity maintain records of its training programme?   | Please answer 'Yes' or 'No'.   |
| 1.11.1 | 401 | If applicable, is there a Board approved documented policy on outsourcing?                              | Select which best applies: 'Yes', 'No' or 'Not Applicable'.<br><br>This question is only applicable if the entity outsources any activities. |
| 1.11.2 | 402 | Was a risk assessment conducted on all outsourcing arrangements prior to initiation of the arrangement? | Select which best applies: 'Yes', 'No' or 'Not Applicable'.  |
| 1.11.3 | 403 | Are there regular ongoing reviews of the outsourcing arrangement?                                       | Select which best applies: 'Yes', 'No' or 'Not Applicable'.<br><br>This question is only applicable if the entity outsources any activities. |

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| 1.11.4  | 404 | In total, how many services does the entity outsource to either third parties, or within its group or subsidiaries, during the reporting period?                | Enter the total number of services the entity outsources from either third parties, or within the entity's group or subsidiaries.            |
| 1.11.5  | 405 | Does the outsourcing agreement clearly set out the obligations of both parties?   | Select which best applies: 'Yes', 'No' or 'Not Applicable'.<br><br>This question is only applicable if the entity outsources any activities. |
| 1.11.6  | 406 | If applicable, does the outsourcing agreement require the Outsourced Service Provider to file a SAR with the FRA in cases of identified suspicious activity?    | Select which best applies: 'Yes', 'No' or 'Not Applicable'.<br><br>This question is only applicable if the entity outsources any activities. |
| 1.11.7  | 407 | If applicable, is there a contingency plan in the event the Outsourced Service Provider fails to perform the outsourced activity?                               | Select which best applies: 'Yes', 'No' or 'Not Applicable'.<br><br>This question is only applicable if the entity outsources any activities. |
| 1.11.8  | 408 | If applicable, 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'.<br><br>This question is only applicable if the entity outsources any activities. |
| 1.11.9  | 409 | If applicable, does the outsourced AMLCO/MLRO have access to the entity's Board?  | Select which best applies: 'Yes', 'No' or 'Not Applicable'.<br><br>This question is only applicable if the entity outsources any activities. |
| 1.11.10 | 410 | If applicable, 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'.<br><br>This question is only applicable if the entity outsources any activities. |
| 1.11.11 | 411 | Is sub-contracting of any of the outsourced activities permitted?   | Select which best applies: 'Yes', 'No' or 'Not Applicable'.<br><br>This question is only applicable if the entity outsources any activities. |
| 1.11.12 | 412 | Does the entity conduct testing to ensure the Outsourced Service Provider complies with record keeping requirements?  | Select which best applies: 'Yes', 'No' or 'Not Applicable'.<br><br>This question is only applicable if the entity outsources any activities. |

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| 1.12.1 | 413 | Does the entity have any comments or feedback for this tab?            | Please answer 'Yes' or 'No'.  |
| 1.12.2 | 414 | Please use this area to provide any comments or feedback for this tab. | Provide any comments or feedback for this tab.<br>Enter 'N/A' if no comments. |