**Section A**

|  |  |  |
| --- | --- | --- |
| **No #** | **Question** | **Answer** |
| **ENTITY DETAILS** |
| **1** | Full Legal Name |  |
| **1a** | Trading name / DBA name (if any) |  |
| **2** | If applicable, include a list of foreign branches which are covered by this questionnaire |  |
| **3** | Full Legal (Registered) Address |  |
| **3a** | Full Address (Primary Operations) (if different from above) |  |
| **4** | Name of primary financial regulator / supervisory authority, if applicable |  |

|  |
| --- |
| **BUSINESS OPERATIONS** |
| **5** | Please describe the type of business activities that the Entity is involved in |  |
| **6** | Number of customers, split by individual and institutional |  |
| **7** | Please provide breakdown of the top five (5) jurisdictions where customers are based |  |
| **8** | Does the Entity currently provide any cryptocurrency services to customers? | ▢ Yes▢ No |
| **8a** | -- If Yes, are these services provided on a regulated or unregulated basis? | ▢ Regulated ▢ Unregulated▢ Exempt |
| **9** | What proportion of your customer base do you expect to pursue cryptocurrency activity via PayBitoPro? |  |
| **10** | How does the Entity intend to conduct business with PayBitoPro? |  |
|  **Category A (where Entity’s customers do not become customers of** PayBitoPro**)** |  |
| **10a** | -- ▢ Omnibus account in the name of the Entity (Closed Loop) |  |
| **10b** | -- ▢ *[additional categories to be added by Product]* |  |
| **10c** | -- ▢ *[additional categories to be added by Product]* |  |
|  **Category B (where the Entity’s customers become customers of** PayBitoPro**)** |  |
| **10c** | -- ▢ Segregated accounts where the Entity’s customers become customers of PayBitoPro  |  |
| **10d** | -- ▢ *[additional categories to be added by Product]* |  |
| **10e** | -- ▢ *[additional categories to be added by Product]* |  |
| **If Category A selected under Q10, please answer Section B****If Category B selected under Q10, please answer Sections B and C** |
|

**Section B**

**Category A and Category B Models**

|  |
| --- |
| **AML, CTF & SANCTIONS PROGRAMME** |
| **11** | Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards?  | ▢ Yes▢ No |
| **12** | Does the Entity have documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements? *If yes, please provide a copy.* | ▢ Yes▢ No |
| **13** | Does the Entity have a designated officer responsible for overseeing and coordinating the AML, CFT & Sanctions framework? | ▢ Yes▢ No |
| **14** | Does the Entity provide AML, CTF & Sanctions training that is targeted to specific roles, responsibilities and high risk products, services and activities? | ▢ Yes▢ No |
| **15** | Is the Entity's AML, CTF & Sanctions policy approved at least annually by the Board or equivalent Senior Management Committee? | ▢ Yes▢ No |
| **16** | Does the Entity perform an AML & CTF and Sanctions Risk Assessment?  | ▢ Yes▢ No |
| **16b** | -- If Yes, at what frequency? | ▢ Annual▢ Bi-annual▢ Other - please indicate |
| **17** | Does the entity have a record retention policy? | ▢ Yes▢ No |

|  |
| --- |
| **KYC & CDD** |
| **18** | Does the entity have a KYC/CDD policy? | ▢ Yes▢ No |
| **19** | Does the Entity verify the identity of the customer? | ▢ Yes▢ No |
| **20** | Please list the information that is collected at onboarding *(Select all that apply)* | **Individuals**▢ Full legal name▢ Date of birth▢ Residential Address▢ Country of Nationality ▢ A government issued color photo ID card▢ Email address▢ Phone number▢ Purpose of account▢ Expected activity▢ Employment status▢ Source of funds/wealth**Institutions**▢ Name▢ Industry type▢ Address of operations / trading ▢ Ownership structure▢ Ultimate beneficial owners at 25%▢ Ultimate beneficial owners at 10%▢ Authorised signatories▢ Controllers▢ Purpose of account▢ Expected activity▢ Source of funds ▢ Source of wealth of beneficial owners |
| **21** | What documentation does the Entity accept to verify the source of funds/source of wealth of its customers? *(Select all those that apply)* | ▢ Bank statements▢ Payslips▢ Financial statements ▢ Loan Agreements▢ Annual report▢ Other - please indicate***For crypto industry only:***▢ Documentation that supports crypto mining operations▢ Supporting evidence from an external crypto exchange ▢ Other - please indicate |
| **22** | Does the Entity prohibit the opening and keeping of anonymous and fictitious named accounts? | ▢ Yes▢ No |
| **23** | Does the Entity prohibit accounts/relationships with shell banks? | ▢ Yes▢ No |
| **24** | Does the Entity have a risk based approach to screening customers for adverse media/negative news (e.g. based on risk rating and/or frequency)? | ▢ Yes▢ No |
| **25** | Does the Entity have a risk based approach to screening customers and connected parties to determine whether they are Politically Exposed Persons (PEPs), or controlled by PEPs (i.e. based on risk rating and/or frequency)? | ▢ Yes▢ No |

|  |
| --- |
| **MONITORING & REPORTING** |
| **26** | Does the Entity have risk based policies, procedures and monitoring processes for the identification and reporting of suspicious activity? | ▢ Yes▢ No |
| **27** | What is the method used by the Entity to monitor transactions for suspicious activity or patterns? | ▢ Manual▢ Automated▢ A combination of both manual and automated |

|  |
| --- |
| **SANCTIONS** |
| **28** | Does the Entity have a Sanctions Policy approved by management regarding compliance with sanctions law applicable to the Entity, including with respect its business conducted with, or through accounts held at foreign financial institutions? *If yes, please provide a copy.* | ▢ Yes▢ No |
| **29** | Does the Entity screen its customers, including beneficial ownership information collected by the Entity, during onboarding and regularly thereafter against Sanctions Lists? | ▢ Yes▢ No |

|  |
| --- |
| **ANTI BRIBERY & CORRUPTION (ABC)** |
| **30** | Does the Entity have ABC policies, procedures or other controls that are consistent with applicable ABC regulations and requirements and that are reasonably designed to prevent, detect, monitor, and report on bribery and corruption undertaken by employees, directors, or others acting on behalf of the Entity ? *If yes, please provide a copy.* | ▢ Yes▢ No |
| **31** | Does the Entity have an enterprise wide programme that sets minimum ABC standards? | ▢ Yes▢ No |
| **32** | Does the Entity provide ABC training to employees, directors and others that are acting on its behalf (e.g., intermediaries)? | ▢ Yes▢ No |

|  |
| --- |
| **ADDITIONAL COMMENTS** |
| ***If “No” or “Other” is answered for any questions above, please use this space to provide further detail.*** |

**Section C**

**Category B Models Only**

|  |
| --- |
| **AML, CTF & SANCTIONS PROGRAMME** |
| **33** | Are the Entity's policies and procedures updated at least annually? | ▢ Yes▢ No |
| **34** | Are the Entity's policies and procedures gapped against/compared to: |
| **34a** | -- US Standards | ▢ Yes▢ No |
| **34b** | -- EU Standards | ▢ Yes▢ No▢ N/A |
| **35** | Does the Board or equivalent Senior Management Committee receive regular reporting on the status of the AML, CTF & Sanctions programme? | ▢ Yes▢ No |
| **36** | Does the Entity use third parties to carry out any components of its AML, CTF & Sanctions programme? | ▢ Yes▢ No |
| **36a** | -- If Yes, provide further details |  |
| **37** | Does the Entity have a program wide risk based Compliance Testing process (separate to the independent Audit function)? | ▢ Yes▢ No |
| **38** | Does the Entity have an internal audit function, a testing function or other independent third party that assesses AML, CTF and Sanctions policies and practices on a regular basis? | ▢ Yes▢ No |
| **39** | -- If Yes, please provide a summary of the findings of the most recent audit. |  |

|  |
| --- |
| **KYC, CDD and EDD** |
| **40** | Do the Entity's policies and procedures set out when Customer Due Diligence (CDD) must be completed (e.g. at the time of onboarding or within 30 days)? | ▢ Yes▢ No |
| **41** | Does the CDD process result in customers receiving a risk classification? | ▢ Yes▢ No |
| **42** | Does the Entity identify and verify ultimate beneficial owners? | ▢ Yes▢ No |
| **43** | Does the Entity identify and verify authorised signatories (where applicable)? | ▢ Yes▢ No |
| **44** | Does the Entity identify and verify key controllers (where applicable)? | ▢ Yes▢ No |
| **45** | What is the Entity’s minimum (lowest) threshold applied to beneficial ownership identification ? | ▢ 10%▢ 25%▢ Other - please indicate |
| **46** | Does the Entity prohibit dealing with another entity that provides services to shell banks? | ▢ Yes▢ No |
| **47** | Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs? | ▢ Yes▢ No |
| **48** | Does the Entity have a process to review and update customer information based on periodic refresh cycles or trigger events? | ▢ Yes▢ No |
| **49** | Are the Entity's KYC processes and documents subject to quality assurance testing? | ▢ Yes▢ No |

1

|  |
| --- |
| **MONITORING & REPORTING** |
| **50** | Does the Entity have regulatory requirements to report suspicious transactions? | ▢ Yes▢ No |
| **51** | -- If Yes, does the Entity have policies, procedures and processes to comply with suspicious transaction reporting requirements? | ▢ Yes▢ No |
| **52** | Does the Entity have policies, procedures and processes to review and escalate matters arising from the monitoring of customer transactions and activity? | ▢ Yes▢ No |
| **53** | Describe the process, where appropriate, for terminating existing customer relationships due to financial crime risk |  |

|  |
| --- |
| **SANCTIONS** |
| **54** | Does the Entity have policies, procedures or other controls reasonably designed to prohibit and/ or detect actions taken to evade applicable sanctions prohibitions, such as stripping, or the resubmission and/or masking, of sanctions relevant information in cross border transactions? | ▢ Yes▢ No |
| **55** | Does the Entity have policies, procedures, or other controls reasonably designed to prevent the user of another entity’s accounts or services in a manner causing the other entity to violate sanctions prohibitions applicable to the other entity (including prohibitions within the other entity's local jurisdiction)? | ▢ Yes▢ No |
| **56** | Does the Entity screen all sanctions relevant data, including at a minimum, entity and location information, contained in cross border transactions against Sanctions Lists? | ▢ Yes▢ No |
| **57** | Please indicate which of the following Sanctions Lists are used by the Entity in its sanctions screening processes *(please select all that apply)*: | ▢ OFAC SDN List Office of Foreign Asset Control▢ OFAC Non-SDN List▢ European Union Sanctions▢ United Kingdom Embargoes▢ HM Treasury Sanctions List▢ United Nations Sanctions |

|  |
| --- |
| **ADDITIONAL COMMENTS** |
| ***If “No” or “Other” is answered for any questions above, please use this space to provide further detail.*** |