

Main Account No.

(if known):

## DUE DILIGENCE QUESTIONNAIRE FOR FINANCIAL INSTITUTIONS

### A. GENERAL INFORMATION ON THE FINANCIAL INSTITUTION

A.1	Full name	
A.2	Short name (if any)	
A.3	Legal form	
A.4	Country/state registration number (commercial license and/or commercial registry)	
A.5	Country/state registration authority	
A.6	Date of registration	
A.7	Place of registration	
A.8	Effective date of launch of business activities (or expected date of launch, if in the future)	
A.9	Registered address	
A.10	Business address (if different from the registered address)	
A.11	Correspondence address (if different from the registered address or the business address)	
A.12	Website	
A.13	Web page or document where the history of the Financial Institution is described	
A.14	General contact details of the Financial Institution	Phone Fax: E-mail:
A.15	Link to Bankers Almanac (if applicable)	
A.16	Bank Identification Code (BIC) (if applicable)	
A.17	SWIFT code (if applicable)	
A.18	Legal entity identifier (LEI)	
A.19	Global intermediary identification number (GIIN, FATCA)	
A.20	QI employer identification number (QI-EIN) (if applicable)	



B. OWNERSHIP, KEY PERSONS, EMPLOYEES AND FINANCIALS

B.1 Ultimate shareholders holding more than 10% of the Financial Institution Note: in any event, information on the most important shareholder must be provided, even if that shareholder holds less than 10%. (Please replicate this table for each shareholder)		+
		-
B.1.1	Full name	
B.1.2	Date of birth	
B.1.3	Nationality (in case of multiple nationalities, please indicate all of them)	
B.1.4	Country of residence	
B.1.5	Occupation	
B.1.6	Participation (%)	
B.1.7	If PEP status (including status of person closely related to a PEP such as family member and/or associate): <ul style="list-style-type: none"><li>• Description of the function(s) leading to a PEP status and indication whether such function(s) are still held or not (in which case, indication of the relevant period) and</li><li>• In case the above person is not the PEP, detailed description of the links (family, associate) with such PEP</li></ul>	

B.2 Members of the Board of Directors (Please replicate this table for each Board member)		+
		-
B.2.1	<input type="checkbox"/> Executive <input type="checkbox"/> Non-executive	
B.2.2	Full name	
B.2.3	Date of birth	
B.2.4	Nationality (in case of multiple nationalities, please indicate all of them)	
B.2.5	Country of residence	
B.2.6	Occupation (for non-executive board members)	
B.2.7	If PEP status (including status of person closely related to a PEP such as family member and/or associate): <ul style="list-style-type: none"><li>• Description of the function(s) leading to a PEP status and indication whether such function(s) are still held or not (in which case, indication of the relevant period) and</li><li>• In case the above person is not the PEP, detailed description of the links (family, associate) with such PEP</li></ul>	



B.3 Members of the Executive Management/Committee (please replicate this table for each director)		+
		-
B.3.1	Full name	
B.3.2	Position	
B.3.3	Date of birth	
B.3.4	Nationality (in case of multiple nationalities, please indicate all of them)	
B.3.5	Country of residence	
B.3.6	If PEP status (including status of person closely related to a PEP such as family member and/or associate): <ul style="list-style-type: none"><li>• Description of the function(s) leading to a PEP status and indication whether such function(s) are still held or not (in which case, indication of the relevant period) and</li><li>• In case the above person is not the PEP, detailed description of the links (family, associate) with such PEP</li></ul>	

B.4 Employees		
B.4.1	Total number of persons who have an employment agreement with the Financial Institution (full-time equivalent or FTE)  Note: for the avoidance of doubt, "full-time equivalent" means that part-time employees are counted for the exact percentage they work. As a matter of example, if a company has two employees, one working at 100% and the other working at 60%, then this company has a total number of employees of 1.6 FTE	
B.4.2	Countries where the Financial Institution has physical offices	
B.4.3	Percentage of employees in each of the above-mentioned countries	
B.4.4	Description of the functions outsourced by the Financial Institution (e.g. internal audit, IT development)  Notes: <ul style="list-style-type: none"><li>• this question covers also cases where functions are outsourced to another entity of the Group to which the Financial Institution belongs</li><li>• more questions about the internal audit function are available in Section G</li></ul>	
B.4.5	Total number of outsourced resources (FTE), excluding the resources in the outsourced internal audit function (if any)	



B.5	Financial situation	
B.5.1	Share capital (paid up)	
B.5.2	Equity (share capital, accumulated profits, etc.)	
B.5.3	Annual revenues for the last calendar year (or the previous calendar year, if the financial statements of the last year are not yet available)	
B.5.4	Annual profit (or loss) for the last calendar year (or the previous calendar year, if the financial statements of the last year are not yet available)	
B.5.5	Name of external auditors charged with auditing the financial statements	
B.5.6	Did the Financial Institution face insolvency or forced reorganization proceedings in the past 5 years?  If yes, please provide details	

### C. REGULATORY INFORMATION

C.1	License number(s)	
C.2	Type of license(s)	
C.3	Licensed activities	
C.4	Main restrictions applicable to the Financial Institution in relation to the licensed activities (e.g. prohibition to service local clients, no right to grant credits)	
C.5	Issue date(s) of license(s)	License: + Issue date: -
C.6	Issuing authority/authorities	
C.7	Name of supervisory financial authority/authorities (if different from above)	
C.8	Country	
C.9	Webpages/links where the license(s) can be checked	

### D. BUSINESS MODEL

D.1	Business model	
D.1.1	Please describe the Financial Institution's business model	
D.1.2	Please describe how the Financial Institution acquires clients (marketing, introducing brokers, etc.)	



D.2	What type of services does the Financial Institution provide to its clientele? Note: the services that the Financial Institution is seeking to receive from Sirius capital partners LLC are described in Section F.	Yes	No	% of clients <sup>1</sup>
D.2.1	Securities-related services			
	Execution-only trading	<input type="checkbox"/>	<input type="checkbox"/>	
	Receipt and transmission of orders	<input type="checkbox"/>	<input type="checkbox"/>	
	Advisory services	<input type="checkbox"/>	<input type="checkbox"/>	
	Wealth management (to private and corporate clients)	<input type="checkbox"/>	<input type="checkbox"/>	
	Asset management (to institutional clients such as investment funds, pension funds, banks, brokers, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	
	Other securities-related services:			
D.2.2	Services relating to FX/CFD			
	Execution-only trading	<input type="checkbox"/>	<input type="checkbox"/>	
	Receipt and transmission of orders	<input type="checkbox"/>	<input type="checkbox"/>	
	Advisory services	<input type="checkbox"/>	<input type="checkbox"/>	
	Wealth management (to private and corporate clients)	<input type="checkbox"/>	<input type="checkbox"/>	
	Asset management (to institutional clients such as investment funds, pension funds, banks, brokers, etc.)	<input type="checkbox"/>	<input type="checkbox"/>	
	Other forex-related services:			
D.2.3	Credit			
	Mortgage	<input type="checkbox"/>	<input type="checkbox"/>	
	Corporate credit	<input type="checkbox"/>	<input type="checkbox"/>	
	Consumer credit	<input type="checkbox"/>	<input type="checkbox"/>	
	Lombard loan	<input type="checkbox"/>	<input type="checkbox"/>	
	Credit card	<input type="checkbox"/>	<input type="checkbox"/>	
	Other credit activities:			
D.2.4	Payment-related services			
	Wire transfers	<input type="checkbox"/>	<input type="checkbox"/>	
	Money transmission (e.g. Western Union)	<input type="checkbox"/>	<input type="checkbox"/>	
	Dedicated mobile application	<input type="checkbox"/>	<input type="checkbox"/>	
	Debit cards	<input type="checkbox"/>	<input type="checkbox"/>	
	Other money service business (MSB) activities:			
D.2.5	Various			
	Trade finance (e.g. financing of trading of commodities)	<input type="checkbox"/>	<input type="checkbox"/>	
	Investment banking (e.g. issuance of structured products)	<input type="checkbox"/>	<input type="checkbox"/>	
	Trading, custody and transfer of digital assets such as cryptocurrencies	<input type="checkbox"/>	<input type="checkbox"/>	
	Other:			

<sup>1</sup> Please indicate here what percentage of the Financial Institution's clients benefit from such services.



E. INFORMATION ON THE CLIENTS OF THE FINANCIAL INSTITUTION

E.1 Generalities	
E.1.1	Total number of clients
E.1.2	Total assets under custody (held by the Financial Institution directly or with third-party financial institutions)  Note: for FX/CFD brokers, please indicate the total margin deposited by the clients
E.1.3	Total assets under management (i.e. the assets that benefit from the Financial Institution's services in the field of wealth management and asset management, if applicable)

E.2 Target Markets				
	<p>Please tick the boxes below when the Financial Institution has at least one client (or ultimate beneficial owner if different than the client) residing/located in the mentioned region</p> <p>Note: the country of legal/tax residence of the ultimate beneficial owner of the accounts held with the Financial Institution is relevant. For example, in the case of a domiciliary company located in the BVI which is owned by a person residing in Switzerland, Switzerland is the relevant country and therefore the region "Europe (excluding Commonwealth of Independent States (CIS), Ukraine and Georgia)" must be selected</p>	E.2.1	E.2.2	E.2.3
		Please specify, for each region, the top five countries in terms of number of accounts held by existing ultimate beneficial owners	Please specify below the percentage of accounts held by ultimate beneficial owners in each of the countries compared to the total number of clients of the Financial Institution	Please specify below the percentage of assets held by ultimate beneficial owners in each of the countries compared to the total assets under custody held by the Financial Institution
<input type="checkbox"/>	Europe (excluding Commonwealth of Independent States (CIS), Ukraine and Georgia)			
<input type="checkbox"/>	Commonwealth of Independent States (CIS), Ukraine and Georgia			
<input type="checkbox"/>	North America			
<input type="checkbox"/>	South America			
<input type="checkbox"/>	Middle East			
<input type="checkbox"/>	Asia (excluding CIS and Middle East)			
<input type="checkbox"/>	Africa			
<input type="checkbox"/>	Oceania			



E.3	Please complete the table below with respect to the information on the type of clients of the Financial Institution:				
		E.3.1 Yes/No	E.3.2 Percentage of such clients	E.3.3 Percentage of assets held by such clients	E.3.4 Top five countries of domicile of the clients (or of the ultimate beneficial owners if different than the clients)
	Natural persons holding accounts in their own name (i.e. these natural persons do not use structures – see below)				1) 2) 3) 4) 5)
	Structures (offshore companies, trusts, foundations, etc.)				1) 2) 3) 4) 5)
	Operating companies (i.e. companies with a commercial activity)  Note: structures will generally not be considered as operating companies and vice versa. For the sake of consistency, the categories below (e.g. investment funds, banks, etc.) must not be included in the category "operating companies"				1) 2) 3) 4) 5)
	Investment funds				1) 2) 3) 4) 5)
	Pension funds				1) 2) 3) 4) 5)
	Banks				1) 2) 3) 4) 5)
	Brokers and other financial intermediaries				1) 2) 3) 4) 5)



Others (please specify):				1)
				2)
				3)
				4)
				5)
Total		100%	100%	

Note: the total (when it comes to the percentage) must add up to 100%.

E.4 Please complete the table below with respect to high-risk relations and politically exposed persons (PEP):				
Type of clients	E.4.1 Number	E.4.2 Assets held by such clients as a percentage to total assets under custody	E.4.3 Five most relevant business activities/ industries of these clients	
High risk relations (PEP excluded)			1)	2)
			3)	4)
			5)	
Politically exposed persons (including persons closely related to PEPs such as family members and associates)			1)	2)
			3)	4)
			5)	

E.5 Which types of PEPs (including persons closely related to PEPs such as family members and associates) does the Financial Institution have and in which countries are they located? <i>Please make sure that the number of PEP indicated in this section matches the number of PEPs indicated in the table above.</i>				
<input type="checkbox"/>	Local politicians (i.e. politicians residing in the country in which The Financial Institution is located)	If yes, please specify in which countries and whether there are presidents, prime ministers or other high profile politicians among them		
<input type="checkbox"/>	Foreign politicians (i.e. politicians residing in a country other than The country in which the Financial Institution is located)	If yes, please specify in which countries and whether there are presidents, prime ministers or other high-profile politicians among them		
<input type="checkbox"/>	State-owned legal entities	If yes, please specify in which countries and whether there are presidents, prime minister or other high profile politicians among them		





<input type="checkbox"/>	Members of intergovernmental organizations	If yes, please specify in which countries	
<input type="checkbox"/>	Members of international sport federations	If yes, please specify in which countries	
<input type="checkbox"/>	Other :	If yes, please specify in which countries	

**F. INFORMATION ON THE PURPOSE OF THE ACCOUNT(S)**

F.1	What type of services provided by Sirius Capital partners LLC is the Financial Institution requesting?	Yes	No	Comment
	Trading of securities (shares, bonds, investment funds)	<input type="checkbox"/>	<input type="checkbox"/>	
	Custody of securities	<input type="checkbox"/>	<input type="checkbox"/>	
	Spot FX conversion	<input type="checkbox"/>	<input type="checkbox"/>	
	Term deposits and/or fiduciary placements	<input type="checkbox"/>	<input type="checkbox"/>	
	Lombard loans	<input type="checkbox"/>	<input type="checkbox"/>	
	Marginal FX and CFD Trading	<input type="checkbox"/>	<input type="checkbox"/>	
	Interbank FX	<input type="checkbox"/>	<input type="checkbox"/>	
	Bonds Brokerage	<input type="checkbox"/>	<input type="checkbox"/>	
	Trading of digital assets (e.g. cryptocurrencies)	<input type="checkbox"/>	<input type="checkbox"/>	
	Payments	<input type="checkbox"/>	<input type="checkbox"/>	
	Transfers of digital assets (e.g. cryptocurrencies)	<input type="checkbox"/>	<input type="checkbox"/>	
	Other:			

**G. AML/CTF INFORMATION**

G.1	AML/CTF regulations	
G.1.1	Title of the local AML/CTF laws and regulations which the Financial Institution has to comply with	
G.1.2	<p>Please confirm that the Financial Institution has to comply with the above AML/CTF laws and regulations without any limitations or exemptions</p> <p>If this confirmation cannot be given, please provide corresponding explanations</p>	<input type="checkbox"/> Yes <input type="checkbox"/> No. Explanations:



G.2 AML/CTF controls and limitations in terms of payments	
G.2.1	<p>Please confirm that, for each payment that will pass through the Financial Institution's accounts with Sirius Capital Partners LLC, the Financial Institution will check against sanction lists and other relevant lists the information about the ordering party or the beneficiary of such payments. Please also describe how these checks are performed (automatic tool, manually, pre- or post- check, etc.)</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No. Explanations:</p>
G.2.2	<p>Based on applicable laws and regulations, financial institutions regularly refuse to execute or accept payments on behalf of their clients. Apart from those cases, has the Financial Institution put in place general limitations in terms of payments (e.g. prohibited countries, prohibited types of payments)?</p> <p><input type="checkbox"/> No <input type="checkbox"/> Yes. In such case, please provide a brief description of such limitations <input type="checkbox"/></p> <p>Please also indicate whether such limitations are communicated to the clients or not:</p>
G.2.3	<p>More specifically, does the Financial Institution only authorize client payments from and to so-called "reference accounts"?</p> <p>Note: a "reference account" is an account held in the name of the client with another bank (i) from which all payments of such client to the Financial Institution must originate and (ii) which must be the destination account in case of outgoing payment. The requirement of "reference accounts" is widely used in the FX/CFD industry</p> <p><input type="checkbox"/> Yes <input type="checkbox"/> No</p>

G.3 Inspection / audit by the supervisory authority/authorities (CSSF, CySEC, DFSA, FCA, FINMA, MAS, MFSA, etc.)	
G.3.1	Date of the latest AML/CTF inspection/audit performed by the supervisory authority
G.3.2	<p>In relation to the latest AML/CTF inspection/audit performed by the supervisory authority, details about any material findings and corrective actions (if applicable) or confirmation that there were no material findings or corrective actions needed</p> <p>Alternatively, a copy of the report/letter (if in English, German, French, Italian or Spanish) can also be provided</p>
G.3.3	<p>Is the Financial Institution subject to regular AML/CTF inspection/audits by the supervisory authority pursuant to the applicable laws and regulations?</p> <p>Note: if the Financial Institution is unlikely to be subject to an AML/CTF inspection/audit by the supervisory authority in the next three years, the answer to the question should in any event be "no"</p>
G.3.4	If the answer to question G.3.3 is "yes" please specify the standard or expected frequency of the AML/CTF inspection /audit by the supervisory authority



G.3.5	<p>Please specify if the Financial Institution must periodically send AML/CTF-related documents/reports to the supervisory authority</p> <p>If yes, please provide additional details (which documents/reports, frequency, which supervisory authority, etc.)</p>	
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G.4 External AML/CTF audit (if any) by an external auditor		
G.4.1	<p>Name and country of location of the Financial Institution's AML/CTF external auditor</p> <p>Note: in most jurisdictions, the AML/CTF external auditor is the same entity as the audit company auditing the financial statements. If the Financial Institution's audit company auditing the financial statements also perform AML/CTF audits, please indicate the name and country of location of such audit company</p>	
G.4.2	<p>Date of the latest external AML/CTF audit by the Financial Institution's AML/CTF external auditor</p>	
G.4.3	<p>In relation to the latest AML/CTF audit performed by the Financial Institution's AML/CTF external auditor, details about any material findings and corrective actions (if applicable) or confirmation that there were no material findings or corrective actions needed</p> <p>Alternatively, a copy of the report/management letter (if in English, German, French, Italian or Spanish) can also be provided</p>	
G.4.4	<p>Please specify the frequency of the external AML/CTF audit</p>	
G.4.5	<p>If the Financial Institution has no external AML/CTF auditor, please elaborate on the absence of obligation for the Financial Institution to be subject to external AML/CTF audits</p> <p>Note: internal AML/CTF audits that are not performed by a department of the Financial Institution are considered in the next table and must not be considered external AML/CTF audits</p>	

G.5 Internal AML/CTF audit (if any)		
G.5.1	<p>Is the internal audit function held internally (i.e. there is a department of the Financial Institution that is holding that role) or is this function outsourced?</p>	<p><input type="checkbox"/> Held internally</p> <p><input type="checkbox"/> Outsourced</p>
G.5.2	<p>If the internal audit function is held internally, name of the Head of Internal Audit or similar position</p> <p>If the internal audit function is outsourced, name and country of location of company acting as internal auditor and name of the lead partner in charge of the mandate</p>	



G.5.3	Number of employees (FTE) in the internal audit function (whether this function is outsourced or not)	
G.5.4	Please specify to which persons and/or bodies (Board of Directors, Board committee, etc.) the internal audit function reports	
G.5.5	Date of the latest internal AML/CTF audit	
G.5.6	In relation to the latest internal AML/CTF audit, details about any material findings and corrective actions (if applicable) or confirmation that there were no material findings or corrective actions needed  Alternatively, a copy of the report (if in English, German, French, Italian or Spanish) can also be provided	
G.5.7	Please specify the frequency of the internal AML/CTF audit	
G.5.8	If the Financial Institution has no internal audit function performing AML/CTF internal audits, please elaborate on the absence of obligation for the Financial Institution to have such internal audit function	

G.6	Group organization and AML/CTF consolidated supervision (if any)	
G.6.1	Is the Financial Institution part of a group?	<input type="checkbox"/> Yes <input type="checkbox"/> No
G.6.2	If yes, is the Financial Institution subject to an AML/CTF consolidated supervision performed by another entity of the Group (e.g. the holding of the group)?  If yes, please specify which entity of the group performs the AML/CTF consolidated supervision  Please also provide details on the AML/CTF overall supervision and the group AML organization (e.g. frequency of on-site visits by such entity on the Financial Institution)	

G.7	AML Organization	
G.7.1	Head of Compliance (or equivalent role such as Chief Compliance Officer or Compliance Manager)	
G.7.1.1	Name	
G.7.1.2	Exact job title and description of the role (key missions, participation in committees, etc.)	
G.7.1.3	Contact information (email address, phone number)	
G.7.1.4	Has the Head of Compliance been approved by the local supervisory authority? If yes, when and by which local supervisory authority?	
G.7.2	Money Laundering Reporting Officer (MLRO) – if different than the Head of Compliance	
G.7.2.1	Name	
G.7.2.2	Exact job title and description of the role (key missions, participation in committees, etc.)	



G.7.2.3	Contact information (email address, phone number)	
G.7.2.4	Has the MLRO been approved by the local supervisory authority? If yes, when and by which local supervisory authority?	
G.7.3	Various	
G.7.3.1	Name(s) of the deputy(deputies) of the Head of Compliance and MLRO (person(s) standing in when they are unavailable)	
G.7.3.2	Number of employees (FTE) in the Compliance/AML Function, including the Head of Compliance and the MLRO	
G.7.3.3	Please specify to which persons and/or bodies (Executive Committee, etc.) the Head of Compliance and the MLRO report	
G.7.3.4	Are any of the AML/CTF tasks outsourced?  If yes, please list the tasks that are outsourced	
G.7.3.5	If applicable, name and country of location of the subcontractor to whom such AML/CTF tasks are outsourced, and number of employees (FTE) dedicated to the Financial Institution	
G.7.3.6	With the exception of the outsourcing referred to in question G.7.3.4, does the Financial Institution's AML/Compliance Function receive services from external firms?  If yes, please provide additional details (name and location of the external firms, type of services)	
G.7.3.7	Is there a committee within the Financial Institution (e.g. Due Diligence Committee) involved in the acceptance of clients and/or in the management of AML/CTF risks?  If yes, please indicate the composition of this committee and its role	

**H. BANKING RELATIONSHIPS**

H.1	Current (correspondent) banks for USD payments	
	Current (correspondent) banks for EUR payments	
	Current (correspondent) banks for GBP payments	
	Current (correspondent) banks for CHF payments	
	Current major counterparties/brokers for securities trading and custody	
	Current major counterparties/brokers for FX trading	
	Other important counterparties/banking relationships	



Which bank did offer correspondent banking services to the Financial Institution in the past?

H.2	Exact name and country of location of the bank offering correspondent banking services	Period of time	Relationship terminated by such bank or the Financial Institution?	Reason for termination
		From To		
		From To		
		From To		
		From To		

I. MISCELLANEOUS

I.1	<p>Please confirm that, in the last 5 years, neither the Financial Institution nor any of its affiliates have been subject to administrative or criminal actions or sanctions (including public reprimands) from any court or supervisory authority. This confirmation must cover AML/CTF, markets abuses, other conduct matters, segregation of client monies, capital/liquidity requirements and any other legal and regulatory requirements applicable in the Financial Institution’s jurisdiction.</p> <p>If this cannot be confirmed, please indicate when such action or sanction occurred, the severity, and how the Financial Institution or the relevant affiliate addressed the identified shortcomings.</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No. Explanations:</p>
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I.2	<p>Please confirm that no monies or assets of U.S. residents will be deposited on the Financial Institution’s accounts with Sirius Capital Partners LLC.</p> <p>If this cannot be confirmed, please indicate (i) how many U.S. residents are clients (or beneficial owners) of the Financial Institution, (ii) the value of the assets held by these U.S. residents with the Financial Institution, (iii) the expected value of the assets held by these U.S. residents on the Financial Institution’s accounts with Sirius Capital Partners LLC and (iv) how the Financial Institution makes sure that it complies with the applicable U.S. laws and regulations (e.g. advisor license granted by the U.S. S.E.C.)</p> <p><input type="checkbox"/> Yes</p> <p><input type="checkbox"/> No. Explanations:</p>
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## J. REQUIRED DOCUMENTATION

General documents concerning the Financial Institution:

- Extract from the commercial register or any certified document serving the same purpose (e.g. certificate of incorporation, certificate of good standing), not older than 12 months (or link to online register where such document can be consulted free of charge)
- Simple copy of the current financial license(s) (or link to online register where such license can be consulted free of charge)
- Group organization chart (including who holds which entity in which country and what the entities do) or any document providing similar information
- Organization chart of the Financial Institution, including management (mentioning the name of each department) Note: the organization chart is not required for Financial Institutions with more than 100 employees
- Curriculum vitae (CV) of the following persons:
  - Chairman of the Board (unless the CV or a summary of the CV is available in the Financial Institution's audited financial statements or relevant public information)
  - CEO (unless the CV or a summary of the CV is available in the Financial Institution's audited financial statements or relevant public information)
  - Head of Compliance and/or MLRO. Note: the CV is not required for Financial Institutions with more than 1000 employees
  - Head of Internal Audit (if inside the Financial Institution's organization). Note: the CV is not required for Financial Institutions with more than 100 employees
  - Lead partner of the Internal Audit (if the internal audit is outsourced and if the internal audit company has less than 10 employees). Note: the CV is not required if the internal audit company is authorized by a supervisory authority
- Simple copy of a valid ID or passport (or corporate document) of the ultimate shareholders with more than 20% of the shares and/or of the voting rights (unless the names are available in the Financial Institution's audited financial statements or relevant public information)
- Simple copy of the latest audited financial statements and, if more recent, the latest unaudited financial statements of the Financial Institution
- Simple copy of the latest audited financial statements and, if more recent, the latest unaudited financial statements of the company owning the Financial Institution (in case of consolidated supervision)
- Signatures list with signature specimen (unless publicly available)

AML/CTF mandatory documents:

- Wolfsberg Group Questionnaire
  - FCCQ version if the Financial Institution wishes to only open Nostro and/or Treasury accounts
  - CBDDQ version in any other situation
- AML/CTF policy or equivalent document



The below signatory confirms that the information given in this due diligence questionnaire is true and accurate.



First and last names	
Function / Title	
Date	
Signature	