

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/orcommercial 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 registeredaddress or the business address)	
A.12	Website	
A.13	Web page or document where the history of the FinancialInstitution 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

	Ultimate shareholders holding more than 10% of the Financial Institution +					
B.1	Note: in any event, information on the most important share shareholder holdsless than 10%.	cholder must be provided, even if that	-			
	(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 aPEP such as family member and/or associate):  • Description of the function(s) leading to a PEP statusand indication whether such function(s) are still held or not (in which case, indication of the relevant period) and  • In case the above person is not the PEP, detailed description of the links (family, associate) with such PEP					
B.2	Members of the Board of Directors (Please replicate this table for each Board member)		+			
B.2 B.2.1			+			
B.2	(Please replicate this table for each Board member)		-			
B.2	(Please replicate this table for each Board member)  Executive		-			
B.2.1	(Please replicate this table for each Board member)  Executive  Non-executive		-			
B.2.1 B.2.2	(Please replicate this table for each Board member)  Executive  Non-executive  Full name		-			
B.2.1 B.2.2 B.2.3	(Please replicate this table for each Board member)  Executive  Non-executive  Full name  Date of birth		+			
B.2.1 B.2.2 B.2.3 B.2.4	(Please replicate this table for each Board member)  Executive  Non-executive  Full name  Date of birth  Nationality (in case of multiple nationalities, please indicate all of them)		-			



B.3	Members of the Executive Management/Committee(please replicate this able 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):  • Description of the function(s) leading to a PEP status and indication whether such function(s) are still heldor not (in which case, indication of the relevant period) and  • In case the above person is not the PEP, detailed description of the links (family, associate) with such PEP			

D. 4		
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:  • this question covers also cases where functions are outsourced to another entity of the Group to which	
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 arenot 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	
	yes, pieuse 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 servicelocal 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 (ifdifferent 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			
	Receipt and transmission of orders			
	Advisory services			
	Wealth management (to private and corporate clients)			
	Asset management (to institutional clients such as investment funds, pension funds, banks, brokers, etc.)			
	Other securities-related services:			ĺ
D.2.2	Services relating to FX/CFD			
	Execution-only trading			
	Receipt and transmission of orders			
	Advisory services			
	Wealth management (to private and corporate clients)			
	Asset management (to institutional clients such as investment funds, pension funds, banks, brokers, etc.)			
	Other forex-related services:	I.		
D.2.3	Credit			
	Mortgage			
	Corporate credit			
	Consumer credit			
	Lombard loan			
	Credit card			
	Other credit activities:	•		
D.2.4	Payment-related services			
	Wire transfers			
	Money transmission (e.g. Western Union)			
	Dedicated mobile application			
	Debit cards			
	Other money service business (MSB) activities:			
D.2.5	Various			
	Trade finance (e.g. financing of trading of commodities)			
	Investment banking (e.g. issuance of structured products)			
	Trading, custody and transfer of digital assets such as cryptocurrencies			
	Other:			<u> </u>

 $<sup>^{\</sup>rm 1}$  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 Institution directly or with third-painstitutions)				
	Note: for FX/CFD brokers, please indic margin deposited by the clients	cate the total			
E.1.3	Total assets under management (i.e. the benefit from the Financial Institution's stried of wealth management and asset if applicable)	services in the			
E.2	Target Markets				
L.L	Target Markets	E.2.1		E.2.2	E.2.3
	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  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  Europe (excluding Commonwealth of Independent States (CIS), Ukraine and	region, the countries in	top five terms of ccounts held ultimate	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	percentage of assets held by ultimate beneficial owners in each of the countries compared to the
	Georgia)  Commonwealth of IndependentStates (CIS), Ukraine and Georgia				
	North America				
	South America				
	Middle East				
	Asia (excluding CIS and MiddleEast)				
	Africa				
	Oceania				



Please complete the table below with respect to the information on the type of clients of the Financial Institution:					
	E.3.1	E.3.2	E.3.3	E.3.4	
	Yes/No	Percentage of such clients	Percentage of assets held by such clients	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 notbe 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	E.4.2	E.4.3			
		Number	Assets held by such clients as a percentage to total assets under custody	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			1) 2) 3)			
	to PEPs such as family members and associates)			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?  Please make sure that the number of PEP indicated in this section matches the number of PEPs indicated in the table above.			
		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 amongthem	
		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	
		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	



1		Sirius Capitat Partifers	LLC			
		Members of intergovernmental organizations	If yes, which		specify es	y in
		Members of international sportfederations	If yes, which		specify es	y in
		Other:	If yes, which		specify es	y in
		F. INFORM	MATION	I ON T	HE PU	URPOSE OF THE ACCOUNT(S)
F.1	Cap	at type of services provided by Sinital partners LLC is the Financial itution requesting?	rius	Yes	No	Comment
		ding of securities (shares, bonds, nt funds)	invest-			
	Cus	tody of securities				
	Spo	t FX conversion				
	Terr	m deposits and/or fiduciary placen	nents			
	Lorr	nbard loans				
	Mar	ginal FX and CFD Trading				
	Inte	erbank FX				
	Bon	ds Brokerage				
		ding of digital assets (e.g. otocurrencies)				
	Payı	ments				
		nsfers of digital assets (e.g. otocurrencies)				
	Oth	er:				
			G	AML/C	TF INF	IFORMATION
G.1	AML	_/CTF regulations				
G.1.1		of the local AML/CTF laws and r hthe Financial Institution has to co	_			
G.1.2 Please confirm that the Financial Institution has to comply with the above AML/CTF laws and regulations without any limitations or exemptions  Yes  No. Explanations:						
		is confirmation cannot be given, pesponding explanations	olease p	rovide		



G.2	AML/CIF controls and limitations in terms of paymen	TS
G.2.1	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.)	Yes No. Explanations:
G.2.2	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)?	No Yes. In such case, please provide a brief description of suchlimitations
		Please also indicate whether such limitations are communicated to theclients or not:
G.2.3	More specifically, does the Financial Institution only authorize client payments from and to so-called "reference accounts"?	
	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	Yes No
G.3	Inspection / audit by the supervisory authority/author	rities (CSSF, CySEC, DFSA, FCA, FINMA, MAS, MFSA, etc.)
G.3.1	Date of the latest AML/CTF inspection/audit performedby the supervisory authority	
G.3.2	In relation to the latest AML/CTF inspection/auditperformed by the supervisory authority, details about any materia findings and corrective actions (ifapplicable) or confirmation that there were no material findings or corrective actions needed  Alternatively, a copy of the report/letter (if in English German, French, Italian or Spanish) can also be provided	
G.3.3	Is the Financial Institution subject to regular AML/CTF inspection/audits by the supervisory authority pursuant to the applicable laws and regulations?	
	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"	

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	Please specify if the Financial Institution must periodically send AML/CTF-related documents/reports to the supervisory authority	
	If yes, please provide additional details (which documents/reports, frequency, which supervisory authority, etc.)	
G.4	External AML/CTF audit (if any) by an external auditor	
G.4.1	Name and country of location of the Financial Institution's AML/CTF external auditor	
	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 auditcompany	
G.4.2	Date of the latest external AML/CTF audit by the Financial Institution's AML/CTF external auditor	
G.4.3	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	
	Alternatively, a copy of the report/management letter (if in English, German, French, Italian or Spanish) can also be provided	
G.4.4	Please specify the frequency of the external AML/CTF audit	
G.4.5	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	
	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	

G.5	Internal AML/CTF audit (if any)
	Is the internal audit function held internally (i.e. there is a department of the Financial Institution that is holdingthat role) or is this function outsourced?

	G.5.2	If the internal audit function is held internally, name of the Head of Internal Audit or similar position	
		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	
	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	
ļ		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 super	vision (if any)
	G.6.1	Is the Financial Institution part of a group?	Yes
ļ			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)	
ı	67	AMI O	
ŀ	G.7 1	AML Organization	of Compliance Officer or Compliance Market
ļ	G.7.1	Head of Compliance (or equivalent role such as Chi	er Compliance Officer or Compliance Manager)
ļ	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 di	fferent 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. BANKIN	NG 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 securitiestrading 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 bankingservices	Period of time	Relationship terminated by such bank or the Financial Institution?	Reason for termination
		From		
		То		
		From		
		То		
		From		
		То		
		From		
		То		

#### I. MISCELLANEOUS

1.1	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.
	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.
	Yes
	No. Explanations:

1.2	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.
	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.)
	☐ Yes ☐ No. Explanations:

#### J. REQUIRED DOCUMENTATION

Gen	eral documents concerning the Financial Institution:
	Extract from the commercial register or any certified document serving the same purpose (e.g. certificate of incorporation, certificateof 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 providingsimilar 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 financialstatements 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)
ΑML	/CTF mandatory documents:
	Wolfsberg Group Questionnaire
	<ul> <li>FCCQ version if the Financial Institution wishes to only open Nostro and/or Treasury accounts</li> <li>CBDDQ version in any other situation</li> </ul>
	AML/CTF policy or equivalent document

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THE DE	JOW SIGNATORY	Commission to		GIVCII III	tills duc d	mgcrice c	acstroi ii iaii c	is truc arro	accurate.

	+	-
First and last names		
Function / Title		
Date		
Signature		