

KYC QUESTIONNAIRE

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Know Your Client / Client Due Diligence (KYC/CDD) FAQs Sheet

In accordance with Cayman Islands Anti-money Laundering laws and regulations, ZEDRA is required to conduct due diligence on all our clients and related parties, where necessary. A simplified process for satisfying the AML/KYC requirements may apply for entities regulated by a recognised regulator or listed on an approved market or exchange and/or where ZEDRA has previously been provided with the required information from another jurisdiction. Please let your ZEDRA representative if you think you might be eligible. The form is interactive which means you can complete this on your screen, but we will accept handwritten and scanned copies.

Registered Ownership and control

ZEDRA will need to verify identity for directors, shareholders and ultimate beneficial owners. Please see the requirements below for more detail of what is required to meet and satisfy due diligence.

Ultimate Beneficial ownership

- | If the registered shares are held on behalf of a beneficial owner by a nominee, ZEDRA will need to verify the identity for such beneficial owners also.
- | Companies with several corporate layers of ownership and/or control will be asked to provide a structure chart, signed by a Director, to enable us to understand the ownership structure and the individuals behind the structure(s).

CDD documentation

- | All documents listed below must be certified in accordance with the regulations. To help ensure your documents meet and satisfy the requirements, please refer to the highlighted Guidance below in Section 2.
- | All documents in a language other than English must be translated to English and such translation attested to/notarized i.e a certified translation thereof, stating that the translation is a true and correct translation of the original. Please ensure that the certification includes confirmation that the original of the copy document has been sighted and that the copy document provided is a true and correct copy of the original.
- | ZEDRA retains the right to make appropriate and reasonable requests for further documentation to be provided upon written request.

Declaration to be Completed

- | Please complete the Sections and all relevant fields below which are applicable; print, sign and scan a copy to you CaymanKYC@zedra.com

FATCA/CRS

- | Please complete the self-certification form , if applicable (*if you are not sure, ask your ZEDRA representative*); print, sign and scan a copy to CaymanKYC@zedra.com

Continue to questionnaire

KNOW-YOUR-CLIENT (KYC) QUESTIONNAIRE

Please be advised that the following information is required in accordance with the Cayman Islands anti-money laundering and customer identification and verification requirements. The take-on process will not be deemed complete, regardless of whether the funds have been wired, until all the documentation has been received.

Full legal name [as it appears in passport]:

Name you like to be known as:

Current Residential Address:

[or business address for Entity(ies), providing only a P.O. Box is not acceptable]

Nationality(ies):

Date of birth:

Country of birth:

City of birth:

Occupation / legal form:

For entities: Date of incorporation / formation:

Source of Funds *(refer to guidance set out on the first page, above)*:

Source of Wealth *(may be required where simplified due diligence cannot be applied)*:

Description of the purpose of the entity i.e. company formation or purchase i.e. investments:

Contact details

Email:

Phone number(s):

SECTION 1 - Politically Exposed Persons (PEP) / Exemptions / Subscriber Nominees

The client/subscriber or any of its affiliates, controllers and/or direct or indirect beneficial owners is a PEP, or a Related Close Associate (RCA) i.e. family member, closely associated person to a PEP, or is acting on behalf of a PEP? Please check appropriate box

☐ Yes

☐ No

Simplified Due Diligence

Unless the Client/Subscriber meets the criteria set out in Section I – below, the Client/Subscriber will be required to submit identity and verification (ID&V) requirements detailed in Section II – Standard Due Diligence Requirements in accordance with the Cayman Islands legislation.

Please check any of the boxes below that apply.

Is the payment from a bank account in a jurisdiction assessed by the entity as having a low degree of risk of money laundering and terrorist financing in accordance with the Cayman Islands Anti-money Laundering Regulations (as amended) (AMLRs)?

☐ Please check this box if the subscription monies are being transferred from an account in the applicant/client's name, at a bank that is regulated in, and either based or incorporated in or formed under the Acts of the Cayman Islands or a low risk jurisdiction.

Provision of the wire transfer confirmation or a SWIFT payment form including the purchaser's name and account details is required to evidence.

NB: ZEDRA retains the right to make appropriate and reasonable requests for further information and/or ID&V documentation upon written request.

Exemptions

Applicant/Client/Subscriber (as applicable) falls into an Exempted Client Category, set out below:

☐ 1. subject to regulatory oversight in a Country assessed by the entity as a low risk jurisdiction ("Regulated Entity") is a majority-owned subsidiary of a regulated entity i.e. parent directly or indirectly owns more than 50% of the shares in the entity.

Please provide evidence of the Regulation and ownership structure for majority-owned subsidiaries.

Name of Regulator:

Country:

☐ 2. is Listed on an approved/recognized stock exchange ("Listed Entity") or is a majority-owned subsidiary (see 1. Above). *Please provide evidence of listing and ownership structure for majority-owned subsidiary.*

Name of Stock Exchange:

☐ 3. is a central or local government entity, statutory body or agency of government assessed by the entity as a low risk jurisdiction. *Evidence of government ownership required.*

Country:

☐ 4. is a pension fund for a professional association or trade union or for employees of any entities listed under this Section. *Please provide evidence of registration of the pension fund or equivalent.*

☐ 5. is an entity (or a majority-owned subsidiary of an entity) that is required to comply with Anti-money Laundering Regulations (AMLRs) of the Cayman Islands.

Please provide structure chart illustrating the entity's relationship to the entity that complies with the AMLRs.

To apply exemption 5., above, ZEDRA will require written assurance regarding the entity's compliance with the AMLRs of the Cayman Islands, in the form of any of the documents set out below:

- ☐ Board Resolution to include the identification of the Anti-money Laundering Officer(s) (AMLCO)
- ☐ Confirmation from legal counsel, also identifying AMLCO(s)
- ☐ An attestation letter signed by the AMLCO – see Schedule A.

Subscriber is a Nominee [*Fund Investors only*]

- ☐ The Subscriber is not acting as a nominee or agent of a principal; OR
- ☐ The Subscriber is acting as a nominee or agent for a principal, in which case the Subscriber is required to provide a letter AML Nominee Attestation Letter in relation to the underlying principal(s) in accordance with the Cayman Islands requirements, Acts and regulations and is Regulated and is assessed by the entity as a low risk jurisdiction (see Schedule A). NB: The acceptance of this Letter is subject to approval of the Fund or its delegate.

Along with the Attestation Letter, we will require provision of a signed copy of the current Authorised Signatory List and a completed FATCA/CRS Self-certification Form.

SECTION 2 - Standard KYC/CDD Requirements

Where the applicant/client/investor does not fit into any of the categories in Section 1, provision of Certified Copies* of the below documents is required. Deviation from the below is subject to approval of the fund / delegate / Zedra Compliance at their discretion.

Enhanced due diligence documentation may be required if/where a beneficial owner is viewed as a PEP, RCA, or otherwise determined to be higher risk.

1. Individuals

Required documentation

- ☐ Passport or National Identity card that includes photo, date of birth, nationality, place of birth, signature and expiry date
- ☐ Fixed line utility bill or equivalent confirming proof of residential address i.e. electricity, water, etc.
An original or a certified original copy to confirm permanent residential address in the individual's name, which must be a fixed line utility i.e. gas, electricity, water, land line telephone, or council tax, and issued within the last 3 months. Where statement is sent electronically, please provide email attaching statement, sent in the name of the individual;
A Legal Reference Letter (Registered Lawyer/Attorney/Barrister/Accountant) or Bank Reference Letter confirming the client/investor's name, their residential address and length of relationship. The Reference Letter must be addressed to Zedra, provided on Company letterhead and include contact details of the referee.
Note that we cannot accept mobile telephone bills and/or credit card statements proof of residential address.
- ☐ CV/Business bio, if not evidenced elsewhere

2. Companies

- ☐ Certificate of Incorporation, Charter or equivalent with details of the registered office and place of business
- ☐ Constitutional document(s) - Memorandum & Articles of Association
- ☐ Certificate of Good Standing issued within the last 3 months
- ☐ Register of Members or equivalent and evidence of identity for those holding 10% or more of the shares in the Company, Controlling person(s) and the beneficial owners (if different)
- see 1. above for individuals. If the member/shareholder is an entity, please provide the documents set out in the choices 2 - 9 in this section, as applicable.
- ☐ Copy of the latest audited financials
- ☐ Register of Directors / Senior Managers or equivalent and evidence of identity for at least two (2) and any other natural person exercising ultimate effective control
- see 1. above for individuals. If the member/shareholder is an entity, please provide the documents set out in choices 2 - 9 in this section, as applicable.
NB: details for ALL directors required to be provided - go to 9. below
- ☐ Authorised Signatory List and Evidence of Identity of any individual(s) on whose instructions the Signatories on account are to act or may act where such individual(s) are not full-time employees, officers or directors of the Company. - see 1. above
- ☐ A detailed description of the purpose and activities of the Company
- ☐ FATCA/CRS Self-certification Form - completed and signed, as required
- ☐ Beneficial Ownership declaration (see Section 3)
- ☐ Structure / organisational chart, where there are one or more entities in a chain of ownership meeting this criteria, you will need to provide the ownership % for each entity in the chain together with identification verification information for the top person in the chain.

3. Trusts

- ☐ Trust Deed evidencing the existence of the trust.
- ☐ Is the trustee a corporate trustee, licensed and regulated in a country assessed by the entity as a low risk jurisdiction?
- Name of Regulator:
- Country:
- if no, we will require corporate and individual documents for each trustee or signatory of the trustee - see 1. and/or 2. above
- ☐ Evidence of Identity on the Settlor - see 1. above
- ☐ Evidence of Identity on the Protector/Enforcer - see 1. above
- ☐ Evidence of Identity on vested beneficiaries i.e. recipients of Loans and/or distributions, benefits in kind such as enjoyment of assets or license to occupy - see 1. above
- If not vested, provision of date of birth, nationality, permanent residence, and address to be provided - go to 9. below
- ☐ Evidence of identity for any other beneficiary or person who is the object of a power. - see 1. above
- ☐ Authorised Signatory List and Evidence of identity of at least two (2) signatories and/or anyone giving instructions on behalf of the Trust, and evidence that those executing documents on behalf of the Trust are properly authorised i.e. Minutes or resolution(s) appointing the authorised signatories, mandates, etc - see above
- ☐ Copy of the latest financials
- ☐ FATCA/CRS Self-certification Form - completed and signed, as required
- ☐ Beneficial Ownership declaration (see Section 3)
- ☐ Details of the Trust's activities, if not provided elsewhere
- ☐ Structure / organisational chart, where there are one or more entities in a chain of ownership meeting this criteria, you will need to provide the ownership % for each entity in the chain together with identification verification information for the top person in the chain.

4. Partnerships

- ☐ Partnership agreement
- ☐ Certificate of Registration/Establishment or equivalent
- ☐ Certificate of Good Standing
- ☐ Due diligence on the General Partner(s) and/or equivalent Controlling person(s), and Limited Partner(s) (Partners with 10% or more interest), as applicable – see 1 above and a company type in this section
- ☐ Evidence of Identity of any individual(s) on whose instructions the signatories on account are to act or may act where such individual(s) are not full-time employees, officers or directors of the Company. – see 1. above
- ☐ Authorised Signatory List and Evidence of identity of at least two (2) signatories and/or anyone giving instructions on behalf of the Company, and evidence that those executing documents on behalf of the Company are properly authorized i.e. Minutes or resolution(s) appointing the authorised signatories, managing body of the Company, mandates, or equivalent – see 1. above
- ☐ Copy of the latest audited financials
- ☐ FATCA/CRS Self-certification Form – completed and signed, as required
- ☐ Beneficial Ownership declaration (see Section 3)
- ☐ Evidence of trading address of the business/partnership (if not evidenced elsewhere)
- ☐ Structure / organisational chart, where there are one or more entities in a chain of ownership meeting this criteria, you will need to provide the ownership % for each entity in the chain together with identification verification information for the top person in the chain.

5. Limited Liability Company

- ☐ Certificate of Formation or equivalent
- ☐ Copy of Operating Agreement or equivalent
- ☐ Registered office address, and Principal office address (if different)
- ☐ Register of Members and evidence of identity for each Managing Member/Principal or any other natural person who exercises ultimate effective control over the company – see 1. above
- ☐ Beneficial Ownership declaration (see Section 3)
- ☐ Evidence of Identity of any individual(s) on whose instructions the signatories on account are to act or may act where such individual(s) are not full-time employees, officers or directors of the Company – see 1. above
- ☐ Authorised Signatory List and Evidence of identity of at least two (2) signatories and/or anyone giving instructions on behalf of the Company, and evidence that those executing documents on behalf of the Company are properly authorized i.e. Minutes or resolution(s) appointing the authorised signatories, managing body of the Company, mandates, or equivalent – see 1. above
- ☐ Copy of the latest audited financials
- ☐ Details of the LLC's purpose and activities, if not available elsewhere i.e. Offering memorandum
- ☐ FATCA/CRS Self-certification Form – completed and signed, as required
- ☐ Structure / organisational chart, where there are one or more entities in a chain of ownership meeting this criteria, you will need to provide the ownership % for each entity in the chain together with identification verification information for the top person in the chain.

6. Charity

- ☐ Charter document
- ☐ List of donors donating in excess of US\$10,000 (ten thousand) in one calendar year
- ☐ Authorised Signatory List and Evidence of identity of at least two (2) signatories and/or anyone giving instructions on behalf of the Charity, and evidence that those executing documents on behalf of the Charity are properly authorized i.e. Minutes or resolution(s) appointing the authorised signatories, managing body of the Charity, mandates, or equivalent – see 1. above
- ☐ Copy of the latest audited financials
- ☐ FATCA/CRS Self-certification Form – completed and signed, as required
- ☐ Structure / organisational chart, where there are one or more entities in a chain of ownership meeting this criteria, you will need to provide the ownership % for each entity in the chain together with identification verification information for the top person in the chain, if not covered in Charter.

7. Foundation (requirements will vary depending on jurisdiction, enter N/A for those which do not apply)

- ☐ Foundation charter and any supplements/amendments (the latter if applicable)
- ☐ Evidence of identity on the Founder, Guardian and individual Council members – see 1. above
- ☐ Evidence of identity on Beneficiaries, if applicable – see above
- ☐ Evidence that the Foundation is in good standing
- ☐ Authorised Signatory List and Evidence of identity of at least two (2) signatories and/or anyone giving instructions on behalf of the Foundation, and evidence that those executing documents on behalf of the Foundation are properly authorised i.e. Minutes or resolution(s) appointing the authorised signatories, managing body of the Foundation, mandates, etc – see 1. above
- ☐ Copy of the latest audited financials
- ☐ FATCA/CRS Self-certification Form – completed and signed, if applicable
- ☐ Structure / organisational chart, where there are one or more entities in a chain of ownership meeting this criteria, you will need to provide the ownership % for each entity in the chain together with identification verification information for the top person in the chain, if not covered in Charter.

8. Other

- ☐ Please advise the type of structure you have and ☐ A ☐ will follow up with the requirements.

9. Directors Details – Required for all Directors and Beneficiaries (Copy and paste as needed)

1.	Full Name as it appears on Passport:	<input type="text"/>
	Alias names (if applicable):	<input type="text"/>
	Date of Birth:	<input type="text"/>
	Place and City of Birth:	<input type="text"/>
	Permanent Residential Address:	<input type="text"/>
2.	Full Name as it appears on Passport:	<input type="text"/>
	Alias names (if applicable):	<input type="text"/>
	Date of Birth:	<input type="text"/>
	Place and City of Birth:	<input type="text"/>
	Permanent Residential Address:	<input type="text"/>
3.	Full Name as it appears on Passport:	<input type="text"/>
	Alias names (if applicable):	<input type="text"/>
	Date of Birth:	<input type="text"/>
	Place and City of Birth:	<input type="text"/>
	Permanent Residential Address:	<input type="text"/>
4.	Full Name as it appears on Passport:	<input type="text"/>
	Alias names (if applicable):	<input type="text"/>
	Date of Birth:	<input type="text"/>
	Place and City of Birth:	<input type="text"/>
	Permanent Residential Address:	<input type="text"/>
5.	Full Name as it appears on Passport:	<input type="text"/>
	Alias names (if applicable):	<input type="text"/>
	Date of Birth:	<input type="text"/>
	Place and City of Birth:	<input type="text"/>
	Permanent Residential Address:	<input type="text"/>

***Note: all of the above documents must be the most current version and certified within the past 3 months by a suitable certifier**

Those below are acceptable as suitable certifier's to ZEDRA Cayman:

- | Notary Public (must have witnessed the original document and individual together)
- | Registered Lawyer/Attorney/Barrister/Accountant/Actuary or Doctor – practicing in the Cayman Islands (where the certifier is not practicing in the Cayman Islands, they must be able to be identified as accredited by a government approved membership body, by a government acceptable to CIMA)
- | Individuals Approved on an individual basis by a governmental regulatory body (e.g. CIMA) or other body in the same or other jurisdiction with a status deemed comparable to CIMA (FSA, FSC, JFSC, FINMA, SEC, etc.) Likely to be executive management, Board members and/or Money Laundering Reporting Officers and their Deputies
- | Members of the Judiciary
- | Embassy and/or Consular officials
- | Governor or Deputy Governor

Certification wording must include the below:

1. Documents **with photograph**:
"I, [name of certifier] confirm that I have met [name of person whose document is being certified] in person and that this is a true copy of the original document and the photograph is a true likeness of him/ her."
2. Documents:
"I, [name of certifier] confirm that this is a true copy of the original document as seen by me."

The certification **must** contain:

- | date the certification was made
- | signature, position, name and address of the certifying individual
- | contact details of the certifying individual – address, telephone number and/or email address
- | Certification Stamp (*provided the details in the stamp meet the minimum requirements*), and where appropriate a registration/accreditation* number
- | Zedra Certification Form can be completed which allows for certifying various documents [provided under separate cover in email]

Notes

- | It must be possible, from the details provided, to be able to identify the individual certifying is authorised to certify documentation and Zedra must be able to contact the person undertaking the certification, if necessary.
- | Any photograph/image of the individual being certified (passport, driving license etc) must be clear and legible.
- | Any document in a language other than English must be translated to English and such translation attested to and/or notarised.
- | The date of the signatory should be no older than three (3) months.
- | Copies of previously certified copies will not be accepted.

Please note that documents not certified according to the Standards of Certification mentioned above will not be accepted.

*Where a Lawyer/Attorney/Barrister/Accountant/Actuary or Doctor, that doesn't practice in the Cayman Islands, have made representation to certify documentation, it is mandatory to obtain evidence of their accreditation.

SECTION 3 - Beneficial Ownership Declaration

Beneficial Ownership Declaration

For all legal entity Client/Subscriber(s) that do not fall into a category listed under Section 1 above, please complete the following declaration:

Beneficial Owner means:

- (a) In relation to a Client/Subscriber which is a company or partnership, a natural person who ultimately owns or controls, whether through direct or indirect ownership or control, 10% or more of the voting or economic interests in the Client/Subscriber, or who otherwise exercises ultimate effective control over the management of the Client/Subscriber; or
- (b) In relation to a Client/Subscriber which is a trust or other legal arrangement, a natural person who exercises ultimate effective control over the Client/Subscriber.

Either

- ☐ We confirm there is no natural person who would qualify as a “beneficial owner” of the Client/Subscriber or
- ☐ We confirm the following table includes all natural persons who would qualify as a “beneficial owner” of the Client/Subscriber.

Beneficial Ownership Details

Full Name	Residential Address	Date of Birth	Place of Birth	Nationality(ies)	Occupation
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

SECTION 4 - Data Protection

Data Protection

Subject to applicable law, we and other companies in the ZEDRA Group will collect, use, process and disclose your Information in order to:

- | Provide the services;
- | Carry out regulatory checks and meet our obligations to any regulatory authority;
- | Protect ourselves against harm to our rights and interests;
- | Develop and improve our services through assessment and analysis of the information;
- | Prepare high-level anonymised statistical reports from information about you and other parties which may be shared with any persons;
- | Prevent and detect fraud, money laundering, terrorist financing and other crimes;
- | Improve the relevance of marketing messages we may send you which you have consented to receive and which you can opt out of as stated below;
- | Provide you with statements and provide services and products, for assessment and analysis (including credit and/or behaviour scoring, market and product analysis).

To find out more about how we may collect, use and share your personal information please read our Privacy Notice.

SECTION 5 – KYC Sharing Across Other Services/Offices and 3rd Parties

ZEDRA performs Know Your Customer / Client Due Diligence (KYC/CDD) on behalf of various funds, trust and corporate services.

KYC/CDD is mandated by Acts to combat Anti-Money Laundering, Terrorist Financing, Proliferation Financing, and Sanctions. This is undertaken by way of understanding and collecting details on client identity, purpose and activities, source of funds / source of wealth, etc.

FATCA/CRS checks are mandated to combat tax evasion. This is undertaken by checking official identifiers, tax residency and status, bank account details, etc., where applicable.

There will be times where a client / investor / entity / structure may be have a mutual relationship with affiliates of ZEDRA Cayman within the ZEDRA Group i.e. internal group agreements and where KYC will be required to satisfy the regulations in that jurisdiction.

There will be times where a client / investor / entity / structure may request to have their KYC shared with a third-party to satisfy the requirements of said third-party. In this scenario, we ask our client / applicant of record to complete and sign a consent form set out in Schedule B.

☐ Option 1

Consent to share KYC/CDD across the ZEDRA Group that receives services to the client / investor / entity / structure:

I/We hereby consent to ZEDRA Cayman sharing the KYC/CDD held on their file in relation to me/us, including my/our KYC/CDD previously provided, any additional documentation I/We provide, and any related information from them, with any ZEDRA Group affiliate of ZEDRA Cayman worldwide. If, and to the extent there is a need to perform KYC/CDD on me/us in relation to any other entity or to which I/We currently subscribe or may in the future subscribe, and which receive services from the relevant affiliate of ZEDRA Cayman, regardless of whether or not such other entity/fund is affiliated in any way with the particular entity/fund in respect of which I/We received this consent request.

☐ Option 2

Consent to share KYC/CDD to any ZEDRA Cayman affiliate, but only those that receive services from ZEDRA Cayman:

I/We hereby consent to ZEDRA Cayman sharing the KYC/CDD held on their file in relation to me/us, including my/our KYC/CDD previously provided, any additional documentation I/We provide, and any related information from them within ZEDRA Cayman. If, and to the extent there is a need to perform KYC/CDD on me/us in relation to any other entity or to which I/We currently subscribe or may in the future subscribe, and which receive fund administration or other related services from ZEDRA Cayman, regardless of whether or not such other entity/fund is affiliated in any way with the particular entity/fund in respect of which I/We received this consent request. However, I/we do not consent to my/our KYC/CDD to be shared / repurposed for the benefit of affiliates of ZEDRA Cayman; if and to the extent affiliates of ZEDRA Cayman need to obtain information from me/us in order to perform additional KYC/CDD on me/us, I/We expect them to make a separate request for information.

SECTION 6 – Declaration

I certify that all the information provided in this document is complete and accurate. I certify that all information in relation to the beneficial owner(s) of the legal entity is accurate and complete. I confirm that all the information provided in the FATCA/CRS Form is complete and accurate and I will undertake to advise ZEDRA of any updates should any of the above particulars change.

Sincerely,

<div style="border: 1px solid black; height: 40px; width: 330px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; height: 40px; width: 330px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; height: 40px; width: 330px; margin-bottom: 10px;"></div> <div style="border: 1px solid black; height: 40px; width: 330px;"></div>	Full name:	
	Official position:	
	Contact details:	
	Date:	

SCHEDULE A - Declaration Provided To ZEDRA Cayman

AML nominee representative letter / attestation

Name of Nominee (Applicant):

Name of Nominee:

Name of Ultimate Beneficial Owner (UBO):

We, [name], a Company registered in [country] and regulated, supervised or monitored by [name of Competent Authority] confirm the following:

- 1 We have written Policies and Procedures designed to comply with the applicable local AML/CFT laws, Regulations and requirements consistent with the standards established by the FATF Recommendations;
- 2 Our Policies and Procedures, at a minimum, cover (i) obtaining identification and verification of the Client and relevant parties i.e. investors and beneficial owners, as applicable, and understand where the Client is a body corporate, the ownership and control structure of the body corporate; including source of funds and/or wealth; (ii) sanctions screening and screening against international terrorist lists; and (iii) training of employees with respect to money laundering, financing of terrorism, proliferation financing, sanctions and bribery & corruption (collectively "Financial Crime"); and (iv) on-going monitoring of the business relationship to maintain up-to-date KYC information including detection of unusual transactions which are not consistent with the intended purpose and expected business activity, and where necessary the origin of funds and/or source of wealth;
- 3 We confirm we do not transact with Shell banks/companies or accept shell banks as underlying investors or beneficial owners (i.e. foreign bank without any physical presence in any country and that is unaffiliated with a regulated financial group);
- 4 Our record keeping procedures are in accordance with the AML Regulations or comparable legislation if outside the Cayman Islands of 5 years minimum following the closing of an account, the end of a transaction or the termination of the business relationship;
- 5 We will inform you of any PEPs or any situation which by its nature can present a higher risk of money laundering and confirm we apply enhanced customer due diligence measures to all Clients regarded as higher risk (see below);
- 6 Our procedures and practices aim at preventing, detecting and reporting suspected money laundering and terrorist financing to the competent financial reporting authority or equivalent and we confirm that clients' transactions are checked regularly and are monitored for any unusual or suspicious activity.
- 7 In accordance with applicable laws and regulations, including privacy and data protection laws, our entity fully cooperates with governmental and law enforcement authorities;
- 8 We undertake, at ZEDRA's request, to provide copies of all identification data and other relevant documentation set out in Part 2., below, concerning the Client in accordance to Section 24 of the Cayman Islands Anti-Money Laundering Regulations, and/or at the request of the regulatory authority, law enforcement or court of competent jurisdiction without delay.
- 9 As required by applicable laws and regulations, our AML/CFT policies and procedures apply to our branches and subsidiaries.

<input type="text"/>	Full name:	<input type="text"/>
	Official position:	<input type="text"/>
	Contact details:	<input type="text"/>
	Date:	<input type="text"/>

Signature

Additional information to be provided

Is there a PEP and/or RCA involved in the structure

No ☐

Yes ☐

If a PEP and/or RCA is involved, we confirm enhanced due diligence checks have been carried out and where appropriate we have confirmed source of wealth is acceptable.

No ☐

Yes ☐

If yes please provide name of PEP and/or RCA and details of why they are classified as a PEP/RCA (e.g.: former/current political position, family link etc)

SCHEDULE B – Sharing of Personal Data

Consent form

Name of Client (“Client”):	<input type="text"/>
Principal Contact of Client:	<input type="text"/>
Address:	<input type="text"/>
Data subjects: the personal data to be transferred concerns the following categories of data subjects:	<input type="text"/>
Personal data to be Shared:	<input type="text"/>
Does the personal data being transferred concern any sensitive data? If so, please include details.	<input type="text"/>
Purpose of sharing personal data:	<input type="text"/>
Recipients of Client Information to be shared:	<input type="text"/>

ZEDRA Cayman Contact:

Head of Compliance
 ZEDRA Cayman
 PO Box 10176, Governor’s Square
 23 Lime Tree Bay Avenue, PO Box 10176
 Grand Cayman KY1-1002
 Cayman Islands
 @zedra.com

On behalf of the Client, I hereby give my permission for ZEDRA Cayman to share the aforementioned Client information with the aforementioned third parties for the aforementioned purpose.

The Client has had the opportunity to discuss with ZEDRA Cayman the implications of sharing or not sharing the aforementioned Client information with the aforementioned third parties.

The Client’s consent to share its Client information with the aforementioned third parties is entirely voluntary and the Client understands that it may withdraw its consent at any time in writing (including via email) to ZEDRA Cayman’s Head of Compliance, contact details as set out in the table above. Notwithstanding the foregoing, the Client acknowledges that the withdrawal of consent shall not affect the lawfulness of sharing based on consent before its withdrawal. The Client acknowledges that in the event of Client consent being withdrawn, the aforementioned third parties may not be able to proceed to/continue to provide the requested services to the Client.

The Client acknowledges that ZEDRA Cayman acts in accordance with the European Union’s General Data Protection Regulation (Regulation (EU) 2016/679) (“**GDPR**”) and the Cayman Islands’ Data Protection Act (Law 33 of 2017) (“**DPL**”) and the Data Protection Regulations 2018 (SL 17 of 2019) (the “**Regulations**”).

The details pertinent to this personal data transfer are set out in the table above, The Client and ZEDRA Cayman may execute additional annexes to cover additional transfers, whether relating to the same personal data being transferred to another party or whether relating to different personal data being transferred to the same party.

<input type="text"/>	Full name:	<input type="text"/>
	Official position:	<input type="text"/>
	Contact details:	<input type="text"/>
	Date:	<input type="text"/>

Signature

SCHEDULE C - Terms of Reference

“Politically Exposed Person” (PEP) means

- | A person who is or has been entrusted with a prominent public function(s) by a foreign (non-Cayman Islands) country i.e. Head of State or of Government, senior politician, senior government, judicial or military official, senior executive of a state owned enterprise (SoE), and important political party official;
- | A person who is or has been entrusted domestically (in the Cayman Islands) with a prominent public function(s) i.e. Heads of State or of Government, senior politician, senior government, judicial or military official, senior executive of a state owned enterprise (SoE), and important political party official; and
- | A person who has been entrusted with a prominent public function(s) by an international organization like a member of senior management i.e. director, a deputy director and a member of the board or equivalent functions.

“Natural Person” means an individual

“Related Close Associate” (RCA) means any natural person who is known to hold the ownership or control of a legal instrument or person jointly with a PEP, or who maintains some other type of close business or personal relationship with a PEP, or who holds the ownership or control of a legal instrument or person which is known to have been established to the benefit of a PEP.

“Family Member” includes spouse, parent, sibling or child of a PEP.

“Recognised Stock Exchange” means an approved stock exchange in an approved jurisdiction – subject to change.

American Stock Exchange, Australian Stock Exchange, International Securities Exchange, Irish Stock Exchange, Italian SPA, NASDAQ, National Stock Exchange (USA), NYSE / NYSE Arca, NYSE Euronext Brussels, NYSE Euronext Lisbon, NYSE Euronext NV, OMX Nordic Exchange, and the stock exchanges of: Athens, Barcelona, Berlin, Bermuda, Bilbao, Boston, Buenos Aires, Caracas, Chicago, Dusseldorf, Frankfurt, Fukuoka, Hamburg & Hannover, Hong Kong, Johannesburg, Korea, Malaysia, Lima, London, Luxembourg, Madrid, Mexican, Montreal, Munich, Nagoya, Osaka, Oslo, Philadelphia, Rio de Janeiro, Santiago, Sao Paolo, Singapore, Stuttgart, Swiss, Taiwan, Tel Aviv, Thailand, Tokyo, Toronto, Valencia and Vienna.

“Low Risk Jurisdictions” means: a person/entity who is (i) subject to the Anti-Money Laundering Regulations (as amended) of the Cayman Islands, or (ii) regulated in a Country with comparable Acts/Laws as the Cayman Islands, subject to the Anti-Money Laundering Regulations in that Jurisdiction and is not viewed as a higher risk country.

ZEDRA Country Risk

“Controlling Person(s)” means the natural person(s) who exercises ultimate control over the entity. “Control” over an entity is generally exercised by the natural person(s) who ultimately has a controlling ownership interest in the entity.

“Source of Funds and Source of Wealth” means:

- | Source of Funds: activity which generated the assets and their source for this instruction / investment
- | Source of Wealth: how was the client/subscriber’s wealth/net worth earned or acquired with respect to the funds in question e.g. via inheritance, house sale, investments, other.

Where the client/subscriber’s salary is the source of funds and/or wealth, name and details of Employer are required.

“Purchase” meaning a purchase of an interest in an entity to gain exposure to the entity’s investment strategy

Should you have any questions or concerns, please reach out to your Zedra representative who will be able to provide guidance. The questionnaire(s) must be returned to Zedra along with the required identity documents and any other documentation requested by your representative.