

Kraken Anti-Money Laundering Questionnaire

Financial Institution Name:

Location:

Please answer the following questions regarding your Anti-Money Laundering Program:

Anti-Money Laundering Questionnaire

If you answer "no" to any question, please include an attachment with an explanation of the "no" answer.

I. General AML Policies, Practices and Procedures:	Yes	No
1. Is the AML compliance program approved by the FI's board or a senior committee?	Y o	N o
2. Does the FI have a legal and regulatory compliance program that includes a designated officer that is responsible for coordinating and overseeing the AML framework?	Y o	N o
3. Has the FI developed written policies documenting the processes that they have in place to prevent, detect and report suspicious transactions?	Y o	N o
4. In addition to inspections by the government supervisors/regulators, does the FI client have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis?	Y o	N o
5. Does the FI have a policy prohibiting accounts/relationships with shell banks? <i>(A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.)</i>	Y o	N o
6. Does the FI have policies to reasonably ensure that they will not conduct transactions with or on behalf of shell banks through any of its accounts or products?	Y o	N o
7. Does the FI have policies covering relationships with Politically Exposed Persons (PEP's), their family and close associates?	Y o	N o
8. Does the FI have record retention procedures that comply with applicable law?	Y o	N o
II. Risk Assessment:	Yes	No
9. Does the FI have a risk-based assessment of its customer base and their transactions?	Y o	N o
10. Does the FI determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the FI has reason to believe pose a heightened risk of illicit activities at or through the FI?	Y o	N o
III. Know Your Customer, Due Diligence and Enhanced Due Diligence:	Yes	No
11. Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions?	Y o	N o

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12. Does the FI have a requirement to collect information regarding its customers' business activities?	Y o	N o
13. Does the FI assess its FI customers' AML policies or practices?	Y o	N o
14. Does the FI have a process to review and, where appropriate, update customer information relating to high-risk client information?	Y o	N o
15. Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information?	Y o	N o
16. Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers?	Y o	N o
IV. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds:	<u>Yes</u>	<u>No</u>
17. Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities?	Y o	N o
18. Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations?	Y o	N o
19. Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities?	Y o	N o
V. Transaction Monitoring:	<u>Yes</u>	<u>No</u>
20. Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as travelers checks, money orders, etc?	Y o	N o
VI. AML Training	<u>Yes</u>	<u>No</u>
21. Does the FI provide AML training to relevant employees that includes: <ul style="list-style-type: none"> ▪ Identification and reporting of transactions that must be reported to government authorities. ▪ Examples of different forms of money laundering involving the FI's products and services. ▪ Internal policies to prevent money laundering. 	Y	N

Name:
Title:
Signature:
Date: