

General Information

1. Provide a detailed description of your firm’s business model.

2. Regulated instruments, products and services your firm undertakes business in (regulated or unregulated).

☐ Custody ☐ Debt instruments ☐ Equities ☐ Complex instruments ☐ Repurchase transactions ☐ Buy-sell

☐ Other

3. Please list the countries in which your firm undertakes business, the domicile of its UBO and any subsidiaries of the firm.

4. The ownership structure of this particular entity – through to the ultimate beneficial owner(s) (natural persons) (a diagram of the whole legal structure would help).

5. Does the company have AML procedures.
If Yes, please provide us with a copy of the AML policy and complete the enclosed “AML Questionnaire”.

☐ No ☐ Yes

6. Are any funds transfers with affiliated or related parties expected to be carried out using this account?

☐ No ☐ Yes, please indicate turnover:

7. Do other parties affiliated or related to you have an account open with Illiquidx Limited? If “Yes” please provide details below.

☐ No ☐ Yes Explanatory Note: This information is collected to enable us to calculate exposures on a single risk basis taking into account situations where your financial distress could lead to the financial distress of the persons affiliated or related to you and vice versa.

Account number	Account holder	Relationship
<div></div>	<div></div>	<div></div>
<div></div>	<div></div>	<div></div>
<div></div>	<div></div>	<div></div>

8. Anticipated monthly and annual trading turnover, USD

9. Anticipated total account balance, (total securities and funds held), USD

10. Size of wealth (total market value of all physical and intangible assets owned, USD)
Please refer to your Financial Statements

11. Please provide information if the UBO(s) of over 25% of share capital has (have) a second citizenship. If "yes", please specify the country and reason for the second citizenship, and choose the applicable option:

☐ No ☐ Yes, country of the second citizenship

☐ Naturalization ☐ Investment program or similar

12. Please provide information on the source of funds and supporting documentation:

Name(s):

Position:

Duly authorized for and on behalf of:

Signed:

Date

Seal

Sanctions Exposure Questionnaire: Part 1

1. Does the company have any sanctioned party as a client? ☐ Yes ☐ No

‘Sanctioned party’ means any individual or entity specified in the following lists:

EU restrictive measures: <https://data.europa.eu/euodp/data/dataset/consolidated-list-of-persons-groups-and-entities-subject-to-eu-financial-sanctions/resource/3a1d5dd6-244e-4118-82d3-db3be0554112>
OFAC's Sanctions List: <https://www.treasury.gov/resource-center/sanctions/SDN-List/Pages/default.aspx>
US Sectoral Sanctions Identifications (SSI) List: <https://ofac.treasury.gov/consolidated-sanctions-list-non-sdn-lists/sectoral-sanctions-identifications-ssi-list>
UK HM Treasury Sanction List: <https://www.gov.uk/government/publications/financial-sanctions-consolidated-list-of-targets/consolidated-list-of-targets>
United Nations Security Council Sanctions List: <https://www.un.org/sc/suborg/en/sanctions/un-sc-consolidated-list>
OFSI <https://www.gov.uk/government/publications/financial-sanctions-ukraine-sovereignty-and-territorial-integrity>

If 'Yes', please specify details of the sanctioned party and explain cooperation.

2. Does the company have any sanctioned party as a business partner, counterparty, or affiliated company? ☐ Yes ☐ No

If 'Yes', please specify details of the sanctioned party and explain cooperation.

3. Does the company has any sanctioned party in the ownership structure? ☐ Yes ☐ No

If 'Yes', please specify the details of the sanctioned party and the % of ownership.

4. Does the Company have, or plan to have a presence or business interest in any of the following countries: ☐ Yes ☐ No
Iran, Sudan, North Korea, Syria, Cuba, OFAC Comprehensively Sanctioned Country/Region, or with Sanctioned Parties*?

If 'Yes', please specify the details of the sanctioned party and the % of ownership.

- If 'Yes', please explain and include the following:
- Relevant OFAC Comprehensively Sanctioned Country/Region.
 - Products, goods, or services involved.
 - Legal name(s) of any subsidiaries/affiliates involved and confirm whether the subsidiaries/affiliates have a relationship with Illiquidx Limited.
 - Whether activity is under an OFAC specific or general license or other government authorization and specify number/reference.
 - Provide name of Sanctioned Party* if applicable.

If the response to Q4 is 'Yes', complete the table below.

Legal Name of subsidiary/affiliate Involved	Country/Region	OFAC license, general license, or other government authorization/exemption	OFAC License number General License Number (i.e. General License Sb, etc.) Government Authorization/Exemption Number (i.e. 31CFR 515.533)

5. Does the Company have, or plan to have, a presence or business interest in Crimea/Sevastopol Regions?

☐ Yes ☐ No

If 'Yes', please provide the details.

6. Do you screen your clients, business parties, counterparties against sanction lists on onboarding and during the customer life cycle?

☐ Yes ☐ No

If 'Yes', please specify the lists and the provider of your sanction lists.

7. Do you screen your clients' transactions against sanction lists?

☐ Yes ☐ No

If 'Yes', please specify the lists, the providers of your sanction lists and summary of the controls.

8. Will any transactions executed with us end up benefiting a sanctioned party?

☐ Yes ☐ No

If 'Yes', please explain.

9. Have a director, senior officer, or 10% or greater owner or shareholder who is any of the following:

- a resident of an OFAC Comprehensively Sanctioned Country/Region;

- employed or representing a governmental agency, or authority of an OFAC Comprehensively Sanctioned Country/Region, or Venezuela;

- a person who is a Sanctioned Party?

☐ Yes ☐ No

If 'Yes', please explain.

10. Have

. a physical presence in

. conducted, or planned to conduct business activity involving Russia/Belarus targeted by Sanctions•

. planned any new investment in Russia/Belarus (including any JV or other minority investment)?

☐ Yes ☐ No

If 'Yes', please explain.

If the response to either Q4 or Q9 is 'Yes', the supplemental questions below are required to be completed.

If the response to Q10 is 'Yes', the Sanction Customer Questionnaire - Russia/Belarus Annex below is required to be completed.

Supplemental Questions (only required if either Q4 or Q9 have 'Yes' as a response)

List the total approximate percentage of revenue generated or anticipated, either directly or indirectly, through the customer or its subsidiaries or affiliates from operations, sales, services, contracts or any other transactions with persons, entities, or the government (including government-owned entities, agencies and instrumentalities) in an OFAC Comprehensively Sanctioned Country/Region or who are otherwise Sanctioned Parties (excluding Sectoral Sanctions).

Check all that apply and provide approximate % revenue for each jurisdiction or Sanctioned Party

<input type="checkbox"/> Crimea/DNR	<div></div>	%
<input type="checkbox"/> Cuba	<div></div>	%
<input type="checkbox"/> Sanctioned Party Revenue	<div></div>	%
<input type="checkbox"/> Iran, Islamic Republic of	<div></div>	%
<input type="checkbox"/> Syrian Arab Republic	<div></div>	%
<input type="checkbox"/> Korea Democratic People's Republic of	<div></div>	%

If the customer has business dealings in an OFAC Comprehensively Sanctioned Country/Region or with a Sanctioned Party, is this activity segregated from their Illiquidx relationship?

☐ Yes ☐ No

If 'No', please explain how the activity is not segregated and is being facilitated through the Illiquidx relationship, including details of any relevant controls, policies, and procedures. If applicable, please provide license details and a copy of the license, if under an OFAC specific license or governmental license.
Please note, no activity related to Sanctions should be facilitated via the Illiquidx relationship without prior approval directly from Illiquidx, even if authorized under a local regulation.

Sanctions Customer Questionnaire - Russia/Belarus Annex (only required if Q10 has 'Yes' as a response)

Please respond Yes/No and provide a detailed explanation at the bottom of this Annex.

A. Please confirm that the customer has conducted an evaluation of all assets and operations to identify any dealings in Russia/Belarus, or with any Russian/Belarusian entities, and otherwise for compliance with sanctions imposed on Russia/Belarus and related entities.

☐ Yes ☐ No

B. Does the customer do any business with any ministry, agency, state-owned entity, or sovereign fund of the Russian Federation (Central Bank of Russia, the National Wealth Fund, the Ministry of Finance of the Russian Federation, etc.)?

☐ Yes ☐ No

C. Does the customer have dealings in Russia/Belarus or with any Russian/Belarusian entities, including, the following sectors:

☐ Yes ☐ No

- a. Energy (including Petrochemical);
- b. Metals (including Gold, Iron, and Steel) and mining;
- c. Defense/military;
- d. Luxury goods;
- e. Transportation; or
- f. Any sector involving goods controlled by EU, UK, and U.S. Trade Sanctions targeting Russia and Belarus.

D. If involved in the oil/petroleum sector or an industry connected to transactions involving oil/petroleum of Russian origin, does the customer have policies, procedures, and controls for complying with the oil price caps determinations issued by the US/EU/UK?

☐ Yes ☐ No

E. Does the customer provide any accounting, trust or corporate formation services, or management consulting services in Russia or to persons located in Russia?

☐ Yes ☐ No

F. Does the customer rely on any general or specific license(s) related to dealings in Russia or Belarus? If yes, please describe the nature of the general or specific license(s) and the activity for which it must be relied upon.

☐ Yes ☐ No

G. Has the customer applied for, or does it intend to apply for, any Specific Licenses related to dealings in Russia or Belarus? If yes, please describe the nature of the Specific License, the purpose for which it was requested and the status of the application.

☐ Yes ☐ No

H. Will any part of the Illiquidx relationship be used directly or indirectly to fund any activities or business of or with any individual or entity, resident/located/ operating/organized/domiciled in Russia/Belarus, or an entity owned such a party, or acting on behalf or at the direction of such a party?

☐ Yes ☐ No

I. Other than as discussed above, has the customer or, to the customer's knowledge, any of its or any of its subsidiaries' or affiliates' directors, officers, employees, agents or affiliates, taken any action that has resulted or may result in a violation of compliance with sanctions imposed on Russia/Belarus and related entities? If yes, provide details.

☐ Yes ☐ No

If the response to any of the questions from QA to QI is 'Yes', then please provide details in the textbox below.

Please provide details of the Russia/Belarus activity, including the total approximate percentage of revenue generated or anticipated in relation to the activity, either directly or indirectly, through the customer or its subsidiaries or affiliates. Provide your strategy, both current and future (if different), for the related activity, as well as any additional control framework implemented to ensure compliance with relevant sanctions.

Sanctions Customer Questionnaire - Guide to completion, notes, and terms

1. Targeted Sanctions - there have been various targeted sanctions implemented by such authorities as OFAC, EU, OFSI, etc. Some of these sanctions target certain sectors of a country's economy, including: financial services, energy, mining, and defense and related material sectors. These are commonly called 'SSI' (Sectoral Sanction Identifications) sanctions. There have also been many other restrictions implemented, such as; new investment in Russia, certain corporate formation or accounting services, various import or export prohibitions, financing to Russian parties, as well as the facilitation of these activities. These examples are not exhaustive and are intended to give context only.
2. What customer exposure related to Russia, Venezuela, or Belarus should be included?
We DO expect the Questionnaire to reflect if customers:
 - (1) conduct business with a Sanctioned Party (e.g., SSI or SON) in Russia, Venezuela or Belarus;
 - (2) have an owner, director, officer, etc. that is a Russian, Venezuelan or a Belarussian Sanctioned Party;
 - (3) rely on any general or specific licenses related to Russia, Venezuela or Belarus.
3. An affiliate is an entity that directly, or indirectly through one or more intermediaries, controls or is controlled by, or is under common control with, the customer (e.g., an affiliate can be a parent or sister company).
4. Including offices, branches, operations, joint ventures, assets, contracts or investments.
5. Including but not limited to: buying, selling or otherwise dealing in or financing products, merchandise, commodities or services.
6. Sanctioned Party is:
 - (a) any individual or entity listed in any sanctions-related list of designated Persons maintained by OFAC, the U.S. Department of State, the United Nations Security Council, the European Union, any European Union member state, Her Majesty's Treasury of the United Kingdom or other relevant sanctions authority (e.g., OFAC Specially Designated National (SDN), or OFAC Sectoral Sanctions Identifications (SSI) List);
 - (b) any individual or entity operating, organized or resident in a Sanctioned Country/Region (e.g., an entity physically located in Iran or the Crimea region);
 - (c) any entity owned or controlled by any one or more individuals or entities described in (a) or (b), (e.g., a 50% or more owned subsidiary of an OFAC SDN/SSI); OR
 - (d) any individual or entity that is otherwise the target of any sanctions (e.g., the Government of Venezuela or any entity owned or controlled by it, including its agencies and instrumentalities).
7. 'Control' of the customer by a sanctioned party is meant to include one or more of the following factors:
 - The sanctioned party has the right (directly or indirectly) to appoint or remove a majority of the board of directors, or members of the administrative, management or supervisory body of the customer;

or

 - It is reasonable to expect that the sanctioned party either directly or indirectly is or would be able to ensure the affairs of the customer are conducted in accordance with the sanctioned party's wishes.

This could, for example, include:

 - Appointing, solely by exercising one's voting rights, a majority of the members of the administrative, management or supervisory bodies of the customer, who have held office during the present and previous financial year;
 - Controlling alone, pursuant to an agreement with other shareholders in or members of the customer, a majority of shareholders' or members' voting rights in the customer;
 - Having the right to exercise a dominant influence over the customer, pursuant to an agreement entered into with the customer, or to a provision in its Memorandum or Articles of Association, where the law governing that the customer permits its being subject to such agreement or provision;
 - Having the right to exercise a dominant influence referred to in the point above, without being the holder of that right (including by means of a front company);
 - Having the right to use all or part of the assets of the customer;
 - Managing the business of the customer on a unified basis, while publishing consolidated accounts;
 - Sharing jointly and severally the financial liabilities of the customer, or guaranteeing them;
 - Having influence as regards corporate strategy, operational policy, business plans, investment, capacity, provision of finance, human resources and legal matters;
 - Putting in place or maintaining mechanisms to monitor the commercial conduct of the customer;
8. Russian State Owned, Defense/Military, Energy, Transport, Luxury Goods, Metals & Mining, Accounting, Trust or Corporate Formation Services, Management Consulting, Fish, Alcohol, Gold, and Non-Industrial Diamonds. As well as any sector involving goods controlled by EU, UK, and US Trade Sanctions targeting Russia and Belarus.
9. For example, in the last 5 years, has the customer filed a voluntary self-disclosure with OFAC or made an equivalent sanctions-related notification to a relevant authority, become the subject of an administrative subpoena or of a sanctions-related enforcement action, or have any open or ongoing internal or external sanctions-related investigation?

Sanctions Exposure Questionnaire: Part 2

We hereby inform you that the Company, when making transactions with securities, including foreign financial instruments, acts in accordance with the requirements of the legislation, uses its best efforts available in the existing circumstances to identify among its customers legal entities and physical persons which (whose) personal (registration) data coincide with the personal data of the persons included in the lists specified below:

<https://www.treasury.gov/ofac/downloads/sdnlist.pdf>

<https://data.europa.eu/data/datasets/consolidated-list-of-persons-groups-and-entities-subject-to-eu-financial-sanctions>

and uses its best efforts available in the existing circumstances for prevention of situations upon which the monetary resources processing by Illiquidx Limited or deals concluded with Illiquidx Limited can result in provision of any financial benefit, whether directly or indirectly, to any legal entity or physical person included in the lists specified above or is registered, located or operates in any country or other territory subject to a general import, financial or investment embargo under Sanctions.

The Company undertakes to reimburse Illiquidx Limited for any costs and damages (including legal costs and penalties) factually incurred as a result of breach of this guarantee given by the Company.

Name(s):	Signature:	<div>Seal</div>
Position:		
Duly authorised for and on behalf of:	Date:	