**Anti-Money Laundering and Compliance Questionnaire for registered Crypto Assets Service Provider entities requesting services from UAB „Maneuver LT“ (Genome)**

*In order to ensure the effective provision of financial services and fulfill the requirements of KYC (Know-Your-Customer) and AML (Anti-Money Laundering), we ask you to fill in the provided questionnaire.*

*By sending this form back to us, you confirm that the information provided in it is true and correct.*

| No. | Question | Answer |
|---|---|---|
| 1. | Please provide the company’s full legal name and registration number | |
| 2. | Please provide your company's licensing/ registration details, including the registration number and the name of the issuing regulatory authority | |
| 3. | Please provide a detailed description of your business activities and the financial products and services offered | |
| 4. | Please describe the overall anticipated cash flow and transactional volumes expected through your Genome accounts, including the type of payments (e.g. B2B, C2B, B2C) | |
| 5. | Please describe your client base, specifically detailing number of customers, type and distribution by risk categories, and Top 5 countries | |
| 6. | Please provide a complete list of prohibited jurisdictions and countries from which customers are restricted from registering | |




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| 7. | Please provide a complete list of prohibited industries and business activities from which customers are restricted from registering (if B2B customer are serviced) | |
| 8. | Please confirm whether your company holds open accounts with other financial institutions, and provide a complete list of the corresponding bank names and account numbers | |
| 9. | Please indicate whether any of your accounts at other banking institutions have been closed within the past year, specifying the names of the banks involved, year and the exact reasons for the closures | |
| 10. | What specific technical and organizational measures have you implemented to comprehensively safeguard users' digital assets and fiat funds, including robust secure storage infrastructure and advanced encryption methods? | |
| 11. | How do your formal policies and operational mechanisms ensure sufficient liquidity to consistently facilitate smooth trading activities and guarantee timely settlements for all users? | |
| 12. | What comprehensive monitoring frameworks and enforcement measures do you have in place to actively detect, mitigate, and prevent market manipulation, insider trading, and other abusive trading practices? | |
| 13. | Does your company maintains and enforces an internal framework that complies with Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) standards? | |


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| 14. | Please indicate if the company has an employee responsible for implementing and adhering to AML/CTF regulations (MLRO).<br><br>Please provide this employee's full contact information, including full name, direct phone number, and professional email address. | |
| 15. | Please indicate the total headcount of employees currently employed by the company who are primarily dedicated to AML, CTF, and KYC compliance measures | |
| 16. | Please let us know whether your Institution has written policies/procedures for the implementation of the AML/CTF control measures covering:<br><br>*Note: Please name and exact page(s) of the document/procedure.* | |
| | • Know Your Customer (CDD/EDD/ODD) | ☐ YES ☐ NO |
| | • Risk Assessment | ☐ YES ☐ NO |
| | • Transaction Screening/Monitoring | ☐ YES ☐ NO |
| | • SAR/STR Reporting | ☐ YES ☐ NO |
| | • Politically Exposed Persons | ☐ YES ☐ NO |
| | • Sanctions Compliance | ☐ YES ☐ NO |
| | • Fraud | ☐ YES ☐ NO |
| | Please upload the most recent versions of the above-mentioned procedures to your KYC form in [http://www.genome.eu](http://www.genome.eu), or if the files are too big, send them via your dedicated Sales/Account Manager | |
| 17. | Does your institution systematically verify all customers' identities before onboarding? If exceptions exist, specify the exact regulatory exemptions or simplified due diligence (SDD) frameworks applied | |


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| 18. | Briefly describe your customer identification procedure, specifying the verification measures, the documentation collected (physically and remotely), and the precise onboarding stage when this occurs | |
| 19. | Please confirm if your Institution applies Enhanced Due Diligence (EDD) to high-risk customers, and briefly describe measure applied | |
| 20. | Please confirm if your company retains copies of client identity documents and related verification data, and specify the legal storage period | |
| 21. | Please specify the exact financial thresholds or criteria that trigger Source of Funds (SoF) and Source of Wealth (SoW) verification | |
| 22. | Do you identify Politically Exposed Persons (PEP's) or Relatives and Close Associates (RCA's)? If yes, please comment on acceptability of such customers and control measures imposed | |
| 23. | Please briefly describe your international sanctions implementation process, including specific lists, screening tools, frequency, and your internal protocol for handling potential matches | |
| 24. | Please provide a brief overview of your transaction screening and monitoring procedures, specifying the tools, methodologies, and specific risk criteria or thresholds used to detect suspicious activity | |
| 25. | Specify which local or foreign institutions or financial intelligence units (FIUs) your company notifies upon suspecting money laundering or terrorist financing | |


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| 26. | Please describe in greater detail your Ongoing Due Diligence process, including the type of customer information reviewed or updated (e.g., identification documents, source of funds, risk classification), the frequency of such reviews, and any triggers for interim updates | |
| 27. | Please indicate your main suppliers/vendors and specify the activities they engage in/services provided (remote identity verification, KYC, transaction screening and monitoring, etc.).<br><br>If any of the solutions are developed in-house, please mention that as well | |

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