genome

Anti-Money Laundering and Compliance Questionnaire for regulated Forex 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 forex license details, including the license number, the issuing regulatory authority, and a direct link to the regulator's online registry for status validation	
3.	Are you a direct license holder of your trading platform or a White Label? If a White Label, please state the parent entity's name, regulatory details, and how you verify market rate alignment	
4.	Please provide a detailed description of your business activities and the financial products or services offered	
5.	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)	
6.	Please describe your client base, specifically detailing number of customers, distribution by type and risk categories, and Top 5 countries/industries	

7.	Please provide a complete list of prohibited jurisdictions and countries from which customers are restricted from registering	
8.	Please provide a complete list of prohibited industries and business activities from which customers are restricted from registering	
9.	Please confirm if your company holds open accounts with other financial institutions (specifying the names of the institutions where accounts are held), and indicate whether any accounts have been closed within the past year, specifying the bank names, year, and exact reasons for closure.	
10.	Please indicate your Liquidity Provider (LP) and provide a copy of your active LP agreement, along with a recent Execution Report or Bridge Report showing the trade flow from your server to the provider	
11.	Please describe your process for safeguarding client funds, including the specific financial institutions where these segregated or "For the Benefit of Clients" (FBO) accounts are held	
12.	What is your trade flow ratio for A-Book (straight-through processing) versus B-Book (internalized risk)? For B-Book operations, please provide your Risk Management Policy summary and current Capital Adequacy Ratio (CAR) to verify your capacity for client payouts	
13.	Does your company maintains and enforces an internal framework that complies with Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) standards?	

14.	Please indicate if the company has an employee responsible for implementing and adhering to AML/CTF regulations (MLRO). 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: *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, 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	

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 describe your sanctions implementation process, including the specific lists monitored, screening tools used, frequency of checks, and your internal protocol for handling potential matches	
24.	Summarize your transaction monitoring procedures, specifying the screening tools used, risk thresholds for detecting suspicious activity, and the local or foreign Financial Intelligence Units (FIUs)	
25.	Describe your Ongoing Due Diligence process, including the customer data reviewed (IDs, source of funds, risk ratings), review frequency, and specific triggers for interim updates	