

# CANDEY

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21 December 2023

Dear Sir

**Himalaya International Clearing Limited ("Himalaya Exchange")**

We refer to our letter dated 12 December 2023. As you know, we act for Himalaya Exchange.

As foreshadowed by that letter, please find enclosed herein: (1) an independent expert report dated 21 December 2023 produced by Mazars LLP; and (2) a witness statement from Sam H Claydon, a Partner in this firm, to file with the Court today.

If you have any questions, please do not hesitate to contact us.

For the avoidance of doubt, if and to the extent that this letter or its enclosures are disclosed to any third party, nothing in this letter or those enclosures is intended to nor does it waive any applicable privilege. Further, if and to the extent that this letter or its enclosures is disclosed to any third party, and to the extent that it is later determined that this letter or any of its enclosures does contain a waiver of privilege in relation to the information above, we do not intend to nor do we make any wider waiver of any applicable privilege in relation to our instructions or our work product.

Yours faithfully



**CANDEY**  
**Encl.**

Sam Harvey Claydon  
First  
21 December 2023

IN THE MATTER OF UNITED STATES OF AMERICA -V- KWOK ET AL., S1 23 Cr. 118 (AT)

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WITNESS STATEMENT OF SAM HARVEY CLAYDON

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I, **SAM CLAYDON**, partner at CANDEY of 8 Stone Buildings, Lincoln's Inn, London WC2A 3TA **WILL SAY AS FOLLOWS:**

Introduction

1. I am a solicitor of the Senior Courts of England & Wales and a partner at CANDEY Limited ("**CANDEY**"). CANDEY is regulated by the Solicitors Regulation Authority as a law firm. I am also a solicitor-advocate (having obtained my higher rights certification in 2012), and a member of Lincoln's Inn as I hope to be called to the Bar during 2024. I have spent my career specialising in litigation, arbitration and investigations, with a particular focus on financial disputes. I have worked at a number of highly-regarded City firms on a number of market-leading cases. I am duly authorised to provide this witness statement on behalf of the Himalaya Group (as defined below).
2. Given that this witness statement is not being given in English proceedings, I wish to make clear the significance attached the statement of truth that I have signed at the end of this statement. As a solicitor, I am an officer of the Court. I therefore owe various duties to the Court, including a duty not to mislead the Court in any way. I am also subject to a number of other regulatory duties, including the duties to act with independence, honesty and integrity.
3. Except where otherwise stated, my evidence is derived from matters within my own knowledge and is true. Where a matter is not within my own knowledge, I indicate the source of it and I believe it to be true.
4. Nothing that I say in this witness statement is, or is intended to be, any waiver of privilege whatsoever.

Background

5. CANDEY acts for Himalaya International Clearing Limited, Himalaya International Payments Limited and Himalaya International Financial Group Limited (together, the "**Himalaya Group**").
6. Himalaya Exchange is a British Virgin Islands ("**BVI**") registered company, named Himalaya International Clearing Limited, trading as Himalaya Exchange (the "**Exchange**"). It operates a

user-to-user, centralised cryptocurrency exchange platform that consists of an engine that operates a continuously matched order book, in respect of virtual asset products. It is a platform for clients to trade, store and manage the Himalaya cryptocurrencies, namely the Himalaya Coin (“**HCN**”) and the Himalaya Dollar (“**HDO**”). HCN is the Exchange’s trading coin, a cryptocurrency priced by supply and demand. HDO is a stable coin, structured with the aim of maintaining its value at 1:1 to the US Dollar. Both coins are Ethereum-based tokens with backwards compatibility with the ERC- 20 standard.

7. Himalaya International Reserve, and Himalaya International Financial Group are coin issuers. The HDO is issued by the Himalaya International Reserve and the HCN is issued by the Himalaya International Finance Group.
8. The U.S. Department of Justice (the “**DoJ**”) has brought proceedings against William Je, the ultimate beneficial owner of Himalaya Exchange, and others, in which it alleges that the Defendants perpetrated a fraudulent scheme through the Exchange (the “**DoJ Investigation**”). Mr Je and the Himalaya Group vehemently deny any wrongdoing whatsoever and are defending themselves to the full extent permitted by law in the DoJ Investigation.
9. As part of the DoJ Investigation, the DoJ has seized the entirety of the the HDO reserve held in cash USD in Himalaya Exchange accounts belonging to customers of the Exchange. This has caused hardship to those customers, many of whom were ordinary people who had invested their own money into the Exchange.
10. On 6 December 2023, 3,539 customers of Himalaya Exchange (the “**Customers**”) filed a motion pursuant to Federal Rule of Criminal Procedure 41(g) for the return of their property seized by the United States (the “**Customer Action**”). The Customer Action is led by Mr Bradford Geyer, a former employee of the DoJ. A website has been set up at [himalayarestoration.com](http://himalayarestoration.com) which contains further information regarding the Customer Action. The Customers have given their consent for the Exchange to pass on to Mr Geyer their details, including information pertaining to HDO and HCN balances, deposits and redemption information held in their Exchange account. Due to the serious safeguarding and risk of harm concerns this has been done using their unique Himalaya account number (“**HID**”). The Exchange provided the balances as at 10 November 2023 to Mr Geyer in the form of a schedule (the “**Customer Action Schedule**”).
11. The collective position of the Customers is that they are not the victims of any fraud and they have not suffered any losses at the hands of the Himalaya Group. They say that the only losses that they have suffered are as a result of the seizure of Customer deposits undertaken by the DoJ, following which the price of the HCN dropped significantly. Certain Customers have made public statements to the press about the deleterious effect that the seizure has had on their lives, which in certain cases has led to them being unable to access any of their money.

12. The Himalaya Group supports the Customer Action given that it maintains that the DoJ seizure is unlawful and deposits should be returned to the Customers. I understand that the Himalaya Group has instructed two audits of its customer deposits that were undertaken by Armanino, both of which have shown that the Exchange held full reserves equivalent to the HDO they issued to the Customers.
13. The Exchange maintains that it has a duty to its customers to safeguard their assets, in addition to its legal obligations to prevent loss or depreciation of those assets, which includes constant assessment of litigation risk for any failure to act that could result in substantial losses. The Exchange has, at all times, acted with integrity, and has a right to take the necessary steps to ensure that it meets its obligations to its customers.
14. The filings in the Customer Action allege that the Exchange providing information in some way constitutes collusion with the Customer Action. These allegations are unprofessional and are wholly without merit or supporting evidence, as well as being vigorously denied by the Exchange, whose sole objective is to meet its obligations to its genuine customers. The Exchange obtains no benefit from the Customer Action. None of its actions are influenced or directed by any Defendant or any other third party. Indeed; the Customer Action and Mr Geyer are both independent of the Exchange. The exchange takes any untrue or defamatory allegations seriously, and is prepared to take any steps necessary to defend its reputation.

#### **CANDEY's Instruction**

15. The DoJ has alleged in the DoJ Investigation that, amongst other things, the Customers do not exist. The Himalaya Group strenuously denies that allegation and avers that there is no factual basis whatsoever to make it. In relation to that, on 12 December 2023 the Himalaya Group instructed CANDEY to undertake an independent review to establish that, amongst other things and contrary to the incorrect assertions of the DoJ, the Customers do exist and have been onboarded as customers onto the Exchange in compliance with the Himalaya Group's stringent compliance procedures.
16. On 13 December 2023, CANDEY instructed Mazars, in their capacity as forensic accountants, to undertake the following as part of an independent investigation (the "**Independent Review**"):
  - (a) conduct a live and independent review of the customer database (the "**HEX Customer Database**") in order to confirm and document the processes and procedures in place relating to customer onboarding at the Exchange;
  - (b) verify that each of the Customers on the Customer Action Schedule has an Exchange account on the HEX Customer Database;
  - (c) identify and isolate a sample of the Customers in order to:



- (i) verify the existence of “know your client” (“**KYC**”) onboarding information;
  - (ii) verify the financial data contained in the Customer Action Schedule against the live data on the HEX Customer Database for this sample; and
  - (iii) verify the redemptions paid (HDO stable coin redeemed back for USD at the rate of rate 1:1) by the Exchange to Customers (according to the Customer Action Schedule) against the bank statements of the Exchange; and
  - (d) carry out a mock onboarding application to any jurisdiction of choice, including but not limited to the United States.
17. CANDEY have closely supervised the processes involved in the experts’ work, and I describe in the following paragraphs the extent to which we have done so. For that purpose, CANDEY attended the offices of a service company to Himalaya Exchange with authority to access the Himalaya Exchange database (“**admin panel**”) on 14 and 15 December 2023 (I attended on both days, and a solicitor colleague attended with me on 14 December). The purpose of CANDEY’s close supervision has been to ensure the integrity and independence of the Independent Review.
18. The Himalaya Group through the service company has allowed CANDEY and Mazars access to all necessary information in order to undertake the Independent Review. No officer, employee or member of the service company, Himalaya Group or of any companies affiliated to the Himalaya Group has in any way influenced CANDEY or Mazar’s work and both CANDEY and Mazars have been able to work unimpeded.

#### **Live and Independent Review of the Hex Customer Database**

19. Mazars and CANDEY were provided with access to the Hex Customer Database for the purpose of conducting a live and independent review of it, and to confirm and document the processes and procedures in place relating to customer onboarding at the Exchange, as well as to carry out a mock onboarding. These matters relate to “Instruction 1” and “Instruction 4” in Mazars’ Report.
20. CANDEY participated in the process of opening an account with the Himalaya Group at <https://himalaya.exchange/> as more particularly described in Mazar’s report at section 7.
21. CANDEY was shown the HEX Customer Database and how live customer data is presented in that database. In particular, CANDEY saw how an HID number is inputted and the information that is returned when an HID number is entered into the HEX Customer Database.

22. CANDEY understands that access to the HEX Customer Database is restricted to users with the appropriate access privileges. For instance, the finance department can see top ups, redemption amounts and customer balances but cannot see any other information. Edit privileges are restricted to customer support managers, and senior managers. For other users, any editing button does not work.

#### Customer Registration and Verification

23. The customer tier system was then explained to CANDEY in the context of the onboarding process. To register and become a customer of the Exchange, one must verify their email address and phone number with two factor authentication (“2FA”). Each customer is assigned an HID number<sup>1</sup> when they have undergone the 2FA verification. ‘No tier’ means that the customer has an unverified email address and in such circumstances that customer would not be assigned an HID number.
24. If a customer is ‘no tier’ for more than 30 days, their registration application is automatically rejected. After that, a customer would be unable to create an account using that email address. A prospective customer would need to get in touch with customer service if they wished to re-register as a customer of the exchange using the same email address.
25. Once a customer has verified their email address and phone number, they are assigned ‘tier zero’ status. At this stage, no KYC checks have yet been undertaken and even if a customer never undertakes any of those KYC checks, he/she will remain ‘tier zero’. Even if the customer goes through KYC and has been rejected, he/she will remain Tier zero.

#### KYC Process

26. The KYC process consists of a questionnaire, a face scan, a scan of the customer’s identification documents (“ID”) (both scans done using Jumio) and a ComplyAdvantage check.
27. The questionnaire, which was shown to CANDEY as part of the customer onboarding, includes various KYC questions, including points about crypto trading experience, employment status etc. Answers are either selected from a drop down menu or multiple choice. For each answer, a numerical score is given which then, when added up, determines the risk level for that particular customer.
28. Any customer whose risk level is 59 or below is classified as low or medium risk. Those customers (subject to passing their Jumio and ComplyAdvantage checks, as more particularly described below) are automatically approved.

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<sup>1</sup> “HID number” (which is a unique account number attributed to each customer).

29. Any customer whose score is between 60 and 75 is deemed to be high risk. Such customers' profiles are escalated to a compliance analyst who must manually review the KYC questionnaire then, if the analyst is satisfied that the customer can be onboarded, the customer's application is escalated for approval to a compliance manager. The analyst must write and record in the system a risk summary statement for all applications requiring manual review by compliance as evidence of the analyst's overall evaluation and understanding of the applicant's risk profile.
30. Any customer whose score is over 75 is deemed to be ultra-high risk. Such customers' profiles are escalated to a compliance analyst who must manually review the KYC questionnaire then, if the analyst is satisfied that the customer can proceed, the customer's application is escalated for approval to the Client Review and Onboarding Committee (which comprises senior decision-makers).
31. Jumio (<https://www.jumio.com/>) is one of the market leading applications for AML and ID validations. A customer must pass a Jumio check to be onboarded as a customer, for which the customer must first provide a live scan of a government-issued ID. Once the customer inputs their government-issued ID (either using the camera on their PC or mobile device) Jumio also then checks their name using ComplyAdvantage (which is a market-leading tool that checks for any adverse media/online information) and their answers to the KYC questionnaire must match with the corresponding information on their ID. Jumio takes the data from the IDs and populates that information in the customer's profile. When performing the face scan, Jumio also confirms that the scan was being done 'live' rather than by use of a picture.

**Verifying that each Customer has an Exchange account**

32. CANDEY were provided with the Customer Action Schedule and shared that with Mazars for the purposes of the Independent Review. As part of the experts' work in verifying that each of the Customers had an Exchange account on the HEX Customer Database (referred to as "Instruction 2" in Mazars' Report), CANDEY supervised the retrieval of the data for that purpose as I describe in further detail below.
33. Under CANDEY's supervision all Customer data was retrieved from the admin panel for Tier 1 customers by way of a live export of data from the HEX Customer Database to an excel spreadsheet. Tier 1 customers are those customers who have passed all KYC and compliance checks and have been onboarded on to the Exchange. CANDEY saw the input of the search parameters into the HEX Customer Database, the corresponding live data that was then retrieved from those searches on screen, and the export which resulted in the creation of seven Excel spreadsheets. At this stage there was no manual intervention involved in the extraction of the data.

34. The reason that seven Excel spreadsheets were created as a result of the data export was because the HEX Customer Database only allows for a limited number of items to be exported at one time. Under CANDEY's supervision, those seven spreadsheets were combined into one single spreadsheet by copying and pasting the data from each of those seven spreadsheets into one spreadsheet. CANDEY and Mazars verified that the total number of customers listed in the single consolidated spreadsheet added up to the same total as the number of customers in the seven separate spreadsheets.
35. CANDEY then reviewed the columns within the consolidated spreadsheet. We observed that most of the information was irrelevant for the purposes of the Independent Review, but to minimise any manual intervention CANDEY instructed that no columns should be removed simply on the grounds of irrelevance. We then identified the columns that contained personal data that could identify any individual customer. Those columns were the following (the "**Personal Identifiers**"):  
  
username; displayname; fullname; mobile; birthdate; lastcommentby; address1;  
address2; zip;firstmiddlename; lastname; iddocnumber; city.
36. CANDEY then instructed the deletion of all data contained within those columns and oversaw that deletion. The data still contains Each customer's "HID" number: this is a unique numerical identifier for each customer. The Customer Action Schedule also contains the HID's of the Customers, a point to which I return below.
37. Following the deletion of the Personal Identifiers, all the remaining data was copied to a new spreadsheet, copying only the values rather than the underlying formulae. Again, CANDEY instructed and supervised this process.
38. The Customer Action Schedule was then used to identify the Customers from within the composite spreadsheet by using the VLOOKUP function in conjunction with the customer HID's. That resulted in the identification of customer HID matches from the Customer Action Schedule within the composite spreadsheet and highlighted them. All of the non-responsive (and thus non-highlighted) entries were then deleted to leave only the anonymised customer data for the HID's appearing on the Customer Action Schedule. CANDEY then provided that spreadsheet to Mazars. All of this was done under CANDEY's instruction and supervision.

**Identify and isolate a sample of the Customers to verify certain information in detail**

39. As part of "Instruction 3" in Mazar's Report, they have identified and isolated a sample of Customers to: (i) verify the existence of KYC onboarding information; (ii) verify the financial data contained in the Customer Action Schedule against the live data on the HEX Customer Database for this sample; and (iii) verify the redemptions paid (HDO stable coin redeemed back

for USD at the rate of rate 1:1) by the Exchange to Customers (according to the Customer Action Schedule) against the bank statements of the Exchange.

40. CANDEY witnessed the process undertaken to do that, which involved the use of the HEX Customer Database to retrieve the information held on each Customer one by one, by inputting HIDs manually for each Customer in the sample.
41. In relation to (i), CANDEY saw the process undertaken to retrieve the KYC onboarding information then to check that against the relevant Customer in the Customer Action Schedule.
42. In relation to (ii), CANDEY saw the process undertaken to retrieve the Customer's financial data from the Hex Customer Database and check that against the financial data for that Customer contained in the Customer Action Schedule.
43. In relation to (iii), CANDEY saw the process undertaken to verify the redemptions information contained within the Customer Action Schedule against the bank statements provided by the Exchange (such bank statements then being provided by CANDEY to Mazars).

**Mock customer onboarding**

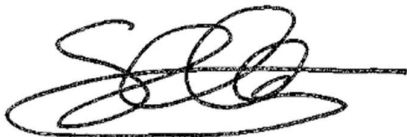
44. Along with Mazars as part of "Instruction 4" referred to in their Report, CANDEY participated in a mock client onboarding. We undertook a test with France as a country of residence and citizenship.
45. After the initial registration screen, we were then presented with security questions. We were prompted to select three questions from a drop-down list of several questions. All were the usual generic security questions. For instance, name of first school, favourite movie, favourite holiday destination etc.
46. Then the system asked us for an email address and password, and to acknowledge that we are not in the US, Canada or Japan or any other jurisdiction that prohibits the holding of cryptocurrency. At that stage, the Exchange's terms and conditions must then be accepted as well as their privacy policy.
47. Once that was complete, we then received an email asking us to click on it to verify the email address used for registration. When clicked, it took us to a page saying, "*Your account has been activated*".
48. Then we were able to log in, but the system prompted us to provide a mobile phone number for the 2FA process. Otherwise, we would be unable to access any functionality on the website.
49. For test purposes, we used the work telephone number of one of the Mazars team. We received a confirmation code with six digits, which was valid for a few minutes. Once we entered it into

the website, we received a message saying that the mobile phone number was successfully verified.

50. The website then displayed a 'complete verification' button. At this point the account did not have any functionality. We were then presented with a list of compliance questions. These are detailed questions around business activity/employment to determine the risk compliance score. We had to select where funds will be received and/or transferred from.
51. After that, we had to provide an ID to be scanned into Jumio. A passport, driver's licence or identity card are the only three acceptable options. A customer can use the camera on their PC or scan a QR code and use their phone, and we opted for the latter. Jumio also takes a face photo. The Mazars team member was immediately rejected because her ID did not match the details entered upon registration. The reason given by Jumio (which is only visible to the Exchange and not the customer) was: "*Full name differs from record.*"
52. After that, a notification appeared on the profile and showed that the customer had been rejected. After clicking on the "rejected" button, the site then said that the customer failed the ID verification process.
53. The Mazars employee also received text messages saying "*please ensure that you enter your full correct name*". Notably, as we saw on the system, her risk score jumped significantly once her ID was rejected.
54. Jumio also completed a ComplyAdvantage check against her name at the same time. In our case the name entered was shown as having passed the checks and no adverse findings were highlighted.
55. A test was also done to onboard as a US resident. The system did not have a US country selection and therefore no account could be opened.

#### STATEMENT OF TRUTH

I believe that the facts stated in this witness statement are true. I understand that proceedings for contempt of court may be brought against anyone who makes, or causes to be made, a false statement in a document verified by a statement of truth without an honest belief in its truth.



**Signed:**

**Name:** Sam Claydon

**Dated:** 21 December 2023

# Dashboard

Below is a brief explanation of what each header does:

## Users

This will allow you to see the number of users on your exchange and their details from username, to email address to exploit attempts, User -> Balances will allow you to see what cryptocurrency each user is holding and the quantity.

## Transactions

The transactions header enables you to see all the ingoings and outgoings of the exchange. Transactions and trades between users can be viewed here, as well as user deposits and withdrawals.

## Market

This section provides an overview of the trading pairs currently enabled on your exchange and the fee structure for them.

## Coins

This allows you to see the different cryptocurrency coins available on your exchange and their status – in terms of availability for trading, deposit and withdrawal. Coins -> Deposit Addresses and Coins -> Withdrawal Addresses show you the addresses linked to each cryptocurrency and their status.

## Settings

Settings will allow you to IP ban users, as well as certain email domain names to prevent them from registering with your exchange. Additionally, you will be able to set up email templates here, email clients and perform generic actions.

## Utilities

utilities. → Translation Manager will allow you to modify text on the front-end of your exchange. The "KEY" field will show you the default web content that shows without any modification. To add your own input, click "show" from the rightmost column titled "ID". From here, an HTML text editor will open up and allow you to change the text at any given time.

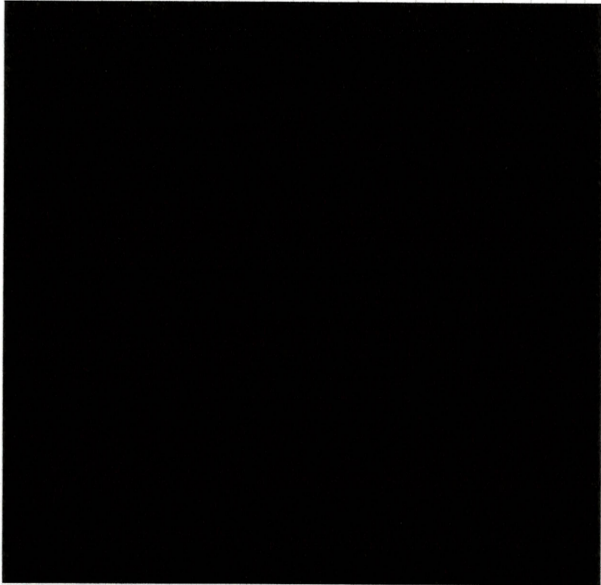
## Admins

This section will allow you to manage who has access to the admin panel and at what level of privilege. All settings to do with admin panel accessibility can be modified here.

[illegible]



User Details

ID				ENABLED	True	Disahn
DATE CREATED				APPROVED	True	Disapprove
DISPLAY NAME				DELETED	False	Expire
USER TYPE				LOCKED OUT	False	Lock
FIRST/ MIDDLE NAME				STOP DEPOSITS	False	Deposit Off
LAST NAME				STOP TRADING	False	Trade Off
FULL NAME				STOP WITHDRAWALS	False	Withdraw Off
BIRTH DATE				FORCED TO CHANGE PASS	False	Force
E-MAIL				2-FACTOR AUTHENTICATION	False	
ADDRESS/ USERNAME				ONLINE	False	
MOBILE PHONE				ABLE TO ACCESS API KEYS	False	Allow
ADDRESS LINE 1						
ADDRESS LINE 2						
RESIDENCE COUNTRY						
CITY						
STATE						
POST CODE						
CITIZENSHIP COUNTRY						
ID DOCUMENT NUMBER						
COMMENTS						
LAST COMMENT BY						
FAILED LOGIN ATTEMPTS						





Profile Balances Ledger Deposits Deposit Addresses Withdrawal Limits Withdrawal Addresses Bank Accounts Active Orders Completed Orders Trades Tiers Mail Queue Notifications Activity Error Log Exploit Attempts Referrals

Referral Bonuses WhiteListed IPs Risk Scoring Transaction Monitoring Security Question Supporting Documents

Coin Any Address Transaction ID Created Date From Created Date To Status Any Withdrawal ID Notified Any

Transaction ID

Created Date From

Created Date To

Status

Withdrawal ID

Notified

mid/yyyyhh:mm pm

mid/yyyyhh:mm pm

Any

Search

Create URL

Export

Displaying 0 - 0 of 0

Time	L2 Action Date	Coin	Amount	Fee	USD	Receiving Details	Comments	Status	CheckSum(LW)	Notified
------	----------------	------	--------	-----	-----	-------------------	----------	--------	--------------	----------

- Profile
- Balances
- Ledger
- Deposits
- Deposit Addresses
- Withdrawals
- Withdrawal Limits
- Redemption Limits
- Withdrawal Addresses
- Bank Accounts
- Active Orders
- Completed Orders
- Trades
- Tiers
- Mail Queue
- Notifications
- Activity
- Error Log
- Exploit Attempts
- Referrals
- Referral Bonuses
- Whitelisted IPs
- Risk Scoring
- Transaction Monitoring
- Security Question
- Supporting Documents

INTERNAL ID	<div></div>
MANUALRISKSCORE	
TOTAL RISK SCORE	
RISK LEVEL	
COMPLYADVANTAGE	
HITS	
COMPLYADVANTAGE	
LINK	
VERIFICATION	
APPLICATION STATUS	
CATEGORY	
NUMBER OF ATTEMPT TO	
JUMIO	

Risk Score Update History

DATE & TIME	FULL NAME	ROLE	RISK SCORE	RISK LEVEL



Himalaya Exchange

Himalaya Dollar

Himalaya Coin

Himalaya Pay

Support

Login

Register

中文

THE NEW CURRENCY FOR THE NEXT GENERATION

In Just A Few Taps,  
YOU CAN BUY  
Himalaya Coin & Himalaya Dollar.

Demonstration of the crypto ecosystem.

Driven by our mission to give you back the power and redefine currency. We want you to

# Client Onboarding and Compliance Process

Trade anywhere, anytime on the most trusted cryptocurrency exchange.

REGISTER TODAY.



June 2022

Last Price

24h Change

24h Volume

Market



HCN  
Himalaya Coin

41.625 HCN

- 1.65%

157,507.824



TRADE



## Our Team

Here at Himalaya Exchange, we are committed to protect our customers and crypto community.

Himalaya Exchange aims to set the crypto industry standard for Know Your Customers.

Our compliance teams are located in United Kingdom and Australia and provide compliance services to the group.

Most of our compliance team members have more than 5 years compliance experience in leading international banks and crypto companies.

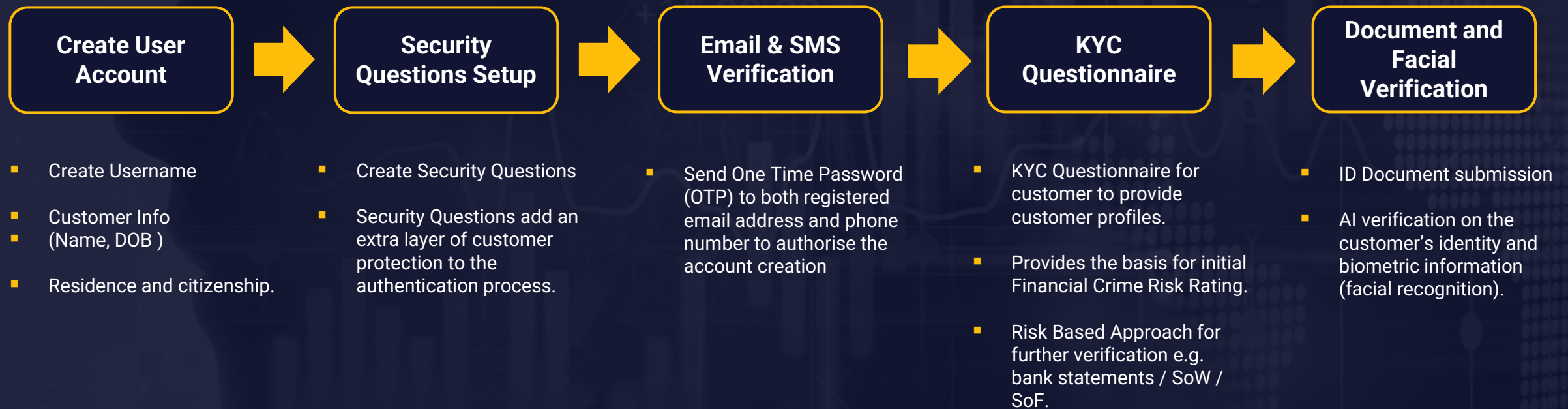
## Our CDD Process

- **Customer Registration Process**
- **Identification and Verification**
- **Name Screening**
- **Risk Assessment**
- **Auto Approval, Auto Rejection and Manual Risk Review**
- **Ongoing Due Diligence**





## Customer Registration Process (Individual)





## Customer Registration Process (Corporate)



- Appointed Representative registers an account with email address, password.
- Same registration process as Individual including Security Questions setup.

- Based on the result of the Business Risk Analysis, Himalaya Exchange only accepts the following legal entities:
  - Personal Investment
  - Companies (PIC)
  - Corporate and Partnerships
  - Trusts
  - Funds

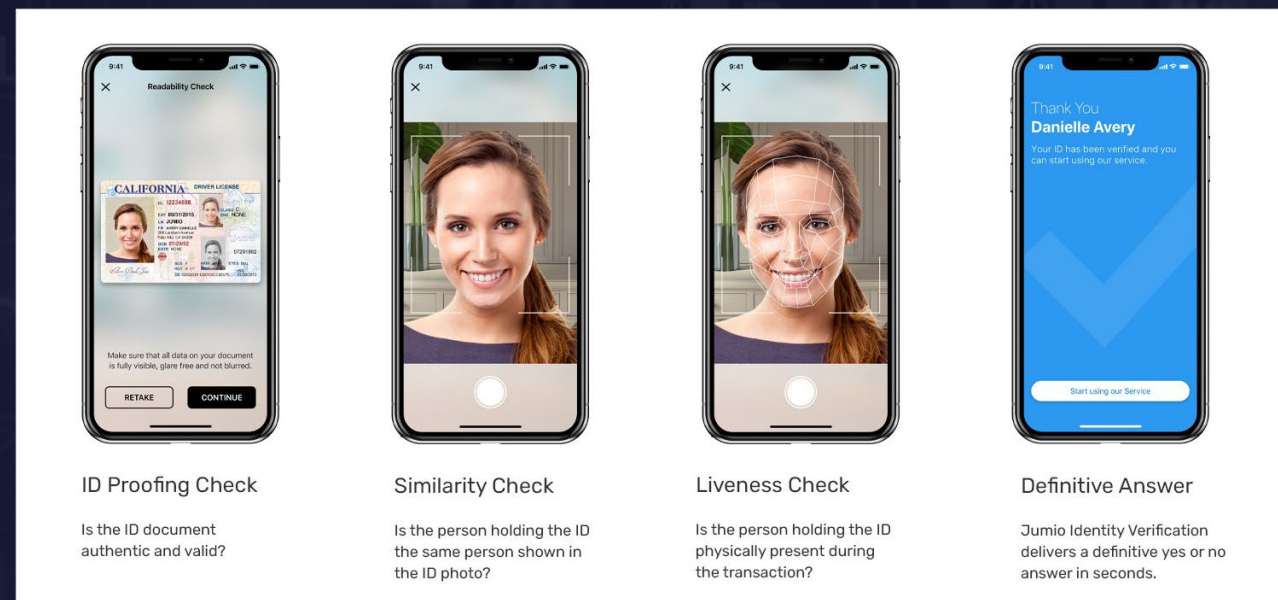
- Due Diligence is conducted on the corporate entity.
- Key documents to verify the ultimate ownership structure and legal status like:
  - Certificate of Incumbency
  - Board Resolution
  - Organisation Chart, etc .

- Every Corporate customers undergoes EDD regardless of their initial Financial Crime Risk Rating.
- In addition to the main party (the legal entity), the connected parties have to go through complete KYC process and provide POA. For example, UBO with 10% or above ownership, Directors, Authorised Representative. For Trust - Settlor, Protector, Beneficiary, etc.
- For merchant account, an extra due-diligence process will be adopted due to the high risk nature.



## Identification and Verification (ID&V) , Screening

- **Identification and Verification.** Customer provides name, address and relevant data from our secured online portal. Customer's identity is verified against the government issued ID card. AI powered facial recognition is used to ensure the picture in ID matches selfie picture.
- **Proof of Address.** Customer address is manually verified against the bank statement, government ID, and utility bills
- **Name Screening** is performed against PEP (Politically Exposed Person), Sanctions, Adverse Media to fully compliant with AML regulations.







## Business Risk

Risk Identified	Description	Controls in Place	Reflected in Customer Risk Model
Product Risk	<ul style="list-style-type: none"> <li>Crypto Exchange</li> <li>Payment App</li> <li>Merchant</li> </ul>	<ul style="list-style-type: none"> <li>Identification, verification, full KYC data required for all users</li> </ul>	<ul style="list-style-type: none"> <li>Expected deposit level</li> </ul>
Customer Type Risk	<p><b>Individual Customers</b></p> <ul style="list-style-type: none"> <li>Individuals across the globe</li> <li>High Net Worth Individuals</li> <li>PEPs</li> </ul> <p><b>Corporate Customers</b></p> <ul style="list-style-type: none"> <li>Personal Holding Companies</li> <li>Trusts</li> <li>Funds</li> <li>Investment Vehicles</li> <li>Complex Structures</li> </ul>	<ul style="list-style-type: none"> <li>Identification, verification, full KYC data required for all users</li> <li>Name Screening against sanctions, PEP, adverse media</li> <li>Enhanced due diligence for higher risk customers (verification of employment, source of funds)</li> </ul>	<ul style="list-style-type: none"> <li>Risk factors include employment, business sectors</li> <li>Additional risk loading for customer for investment vehicles and complex structures.</li> </ul>
Delivery Channel Risk	Non-Face-to-Face	<ul style="list-style-type: none"> <li>Jumio – Biometric verification against ID photo and selfie taken during onboarding</li> </ul>	
Geographical Risk	<p>Clients with linkage to countries subject to:</p> <ul style="list-style-type: none"> <li>Sanctions</li> <li>AML deficiencies listed by FATF</li> <li>High level of corruption</li> </ul>	<ul style="list-style-type: none"> <li>Certain countries prohibited from registration</li> <li>Risk level assigned to each country according to recognised global organisations (e.g. FATF countries, Transparency International) and regularly updated country risk score based on Corruption Perceptions Index (CPI).</li> </ul>	<ul style="list-style-type: none"> <li>Residence country, citizenship, expected country of origin of funds</li> </ul>



## Risk Model Assessment

### Geography Risk

- Resident Country
- Citizenship
- Fund deposit to / receive from

### Product Risk

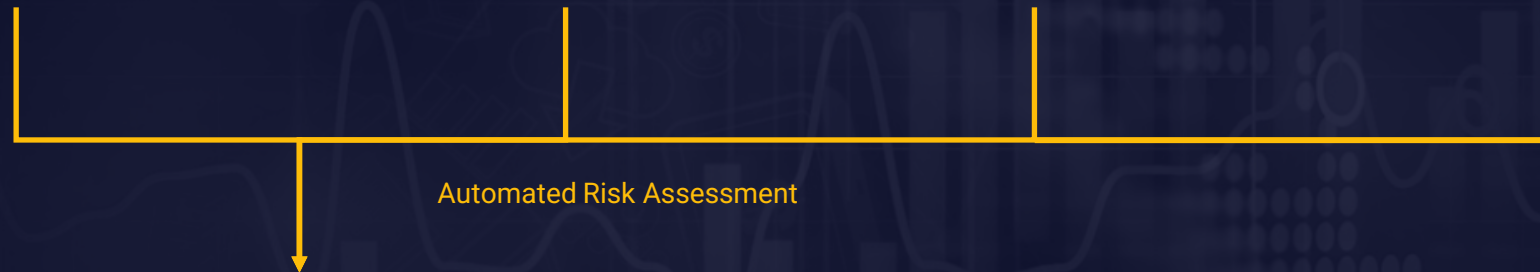
- Crypto Exchange
- Payment Product
- Merchant / Peer-to-Peer

### Transaction Risk

- Planned annual deposit
- Transaction Monitoring

### Customer Risk

- Occupation Status
- Individual or Business Activity Areas



### Final Financial Crime Risk Rating

Score	Classification
0-30	Low
31-59	Medium
60-75	High
75-99	Ultra-High

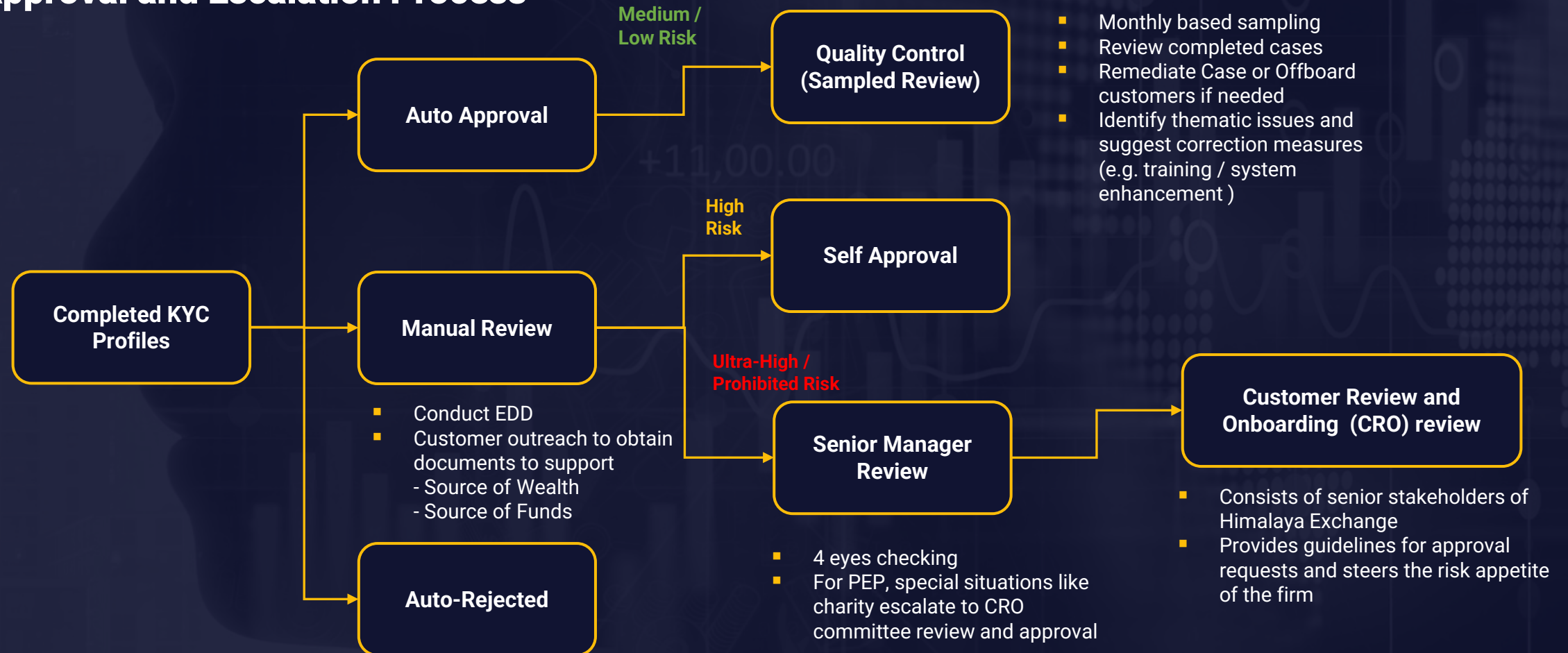
Manual Adjustment

### Fraud Signals

- Sanction List
- PEP Risk
- Adverse Media Coverage
- Red flags from Manual Review

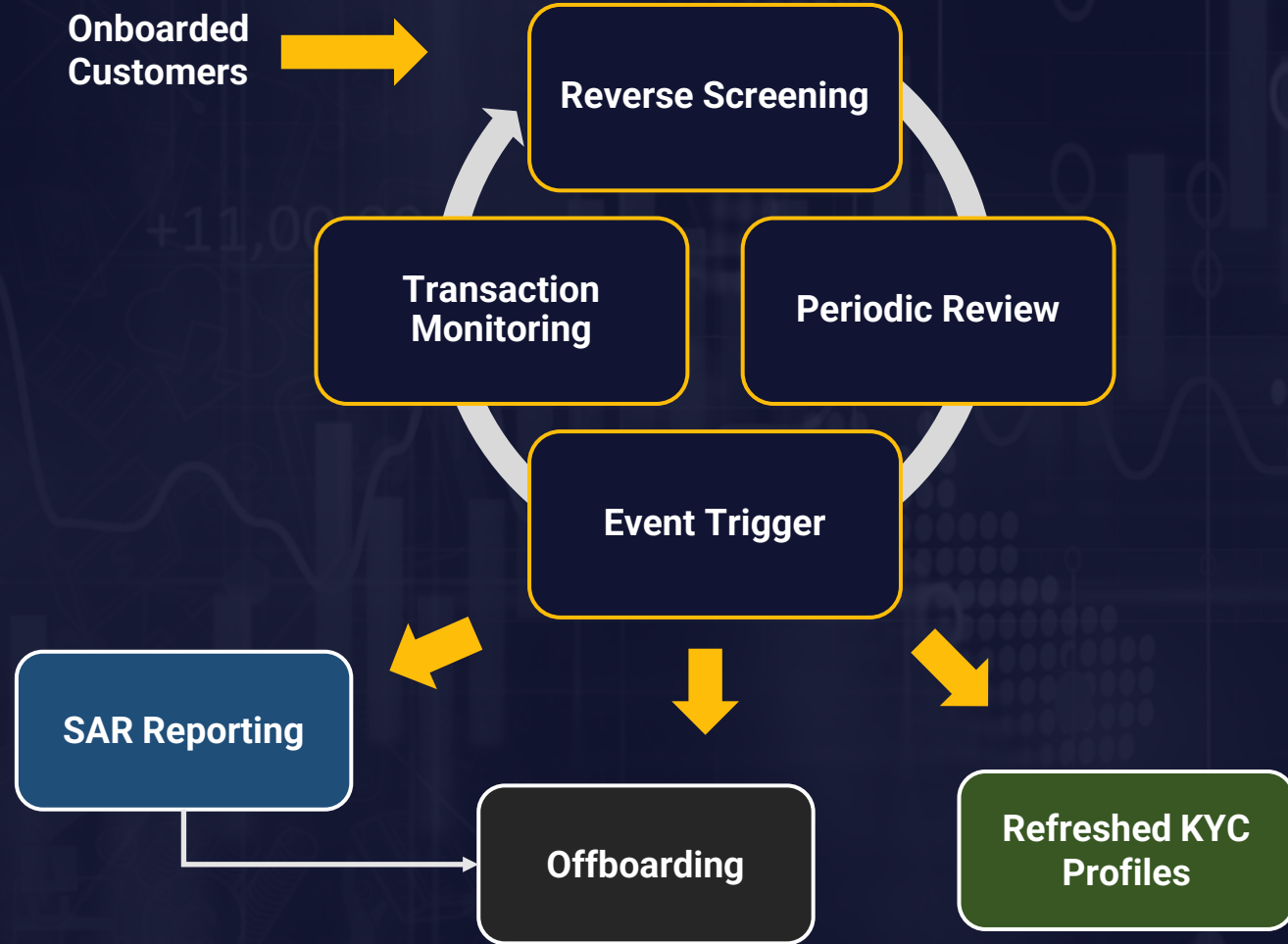


## Approval and Escalation Process





## Ongoing Due Diligence







Himalaya Exchange

Himalaya Dollar

Himalaya Coin

Himalaya Pay

Support

Login

Register

中文

## Demonstration of the

## Client Onboarding and Compliance Process

THE NEW CURRENCY FOR THE NEXT GENERATION

In Just A Few Taps,  
YOU CAN BUY  
**Himalaya Coin & Himalaya Dollar.**

Himalaya Exchange is the world's first true crypto ecosystem.

Driven by our mission to give you back the power and redefine currency. We want you to  
create with us. Himalaya Dollar and Himalaya Coin are how we'll take you to the top. It's time

**Thank you.**

Trade with us. With the world's most trusted cryptocurrency exchange.

This is just the beginning.

REGISTER TODAY.



June 2022

Last Price

24h Change

24h Volume

Market



HCN  
Himalaya Coin

41.625 HDO ↓

- 1.65%

157,507.824



TRADE

Profile Balances Ledger Deposits Deposit Addresses Withdrawals Redemption Limits Withdrawal Addresses Bank Accounts Active Orders Completed Orders Trades Tiers Mail Queue Notifications Activity Error Log Export Attempts Referrals Referral Bonuses

Whitelisted IPs Risk Scoring Transaction Monitoring Security Question Supporting Documents

INTERNAL ID	YDREXN
MANUAL RISK SCORE	35
TOTAL RISK SCORE	35
RISK LEVEL	Medium
COMPLIANCE ADVANTAGE	0
HITS	0
COMPLIANCE ADVANTAGE LINK	<a href="#">Compliance Advantage Link</a>
VERIFICATION LINK	<a href="#">Verification Link</a>
APPLICATION STATUS	Approved
CATEGORY	Approved By Compliance
NUMBER OF ATTEMPT TO JUMIO	3
	Reset

## KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
10	Place of Birth	Korea (South)	0
11	Citizenship on the document	Korea (South)	25
12	Please tell us about your current employment status.	Employed	0
13	Please tell us about your occupation or business activity.	Technology and communications-information technology	5
14	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	0
15	Is your individual activity or business registered or conducted in preferential tax zone for instance, free economic zone, offshore jurisdiction?	No	0
16	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10k (more or little of my turnover is in cash)	0
17	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	0-10k (more or little of my turnover is in cryptocurrency)	0
18	Please tell us about your source(s) of income funds. Select more than one box if necessary.	Salary / business income, loan / Credit	0
19	Please tell us about your source(s) of wealth? Select more than one box if necessary.	Employment income, business profits	0
20	Please select the service(s) you plan to use. Select more than one box if necessary.	Crypto Trading, Long term investment, Participate in Initial Exchange Offering, Crypto payment	5
21	How much do you plan to deposit per year (USD and crypto combined)?	< 10 000	0
22	Please tell us which countries the funds will be received and or transferred from.	Korea (South)	0
23	Let us know what your level of experience is with cryptocurrency trading? Please select one:	Beginner	0
24	How many years of experience do you have in crypto trading?	< 1 Year	0
25	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public function in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	No	0

## Comment

Add a comment...

DATE & TIME	FULL NAME	ROLE	COMMENT
-------------	-----------	------	---------

Add Comment

5/9/2021 12:51:05 PM

Based on the KYC response, the Customer is Medium Risk considering the following risk factors:

- Citizenship on the document is Korea (South) [25]
- Occupation or business activity is Technology and communications-information technology [5]
- Selected service includes Crypto Trading, Long term investment, Participate in Initial Exchange Offering, Crypto payment [5]

Screening is performed against the Customer. There is no hit against the searched name.

The Customer provided a validated ID document and passed Jumio but the ID document cannot be shown on the admin panel due to the technical issue.

Overall, KYC Onboarding Analyst [REDACTED] is of the view that the initial AML CTF Assessment result is consistent with the Customer's profile and does not oppose the decision to onboard the Customer with Medium Risk. [RISK SCORE:35].

INTERNAL ID232PFC

MANUAL SCORE51

TOTAL RISK SCORE51

RISK LEVELMedium

COUNTRY ADVANTAGE0

VERIFICATIONStatus: Approved

APPLICATION STATUSApproved

CATEGORYApproved: 3, Corruption

NUMBER OF ATTEMPT TO JUDGE3

Score

Score: 51

Country Advantages Link

KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
10	Place of birth	China	0
11	Citizenship on the document	China	31
12	Please tell us about your current employment status.	Employed	0
13	Please tell us about your occupation or business activity.	Technology and communications - information technology	0
14	Please tell us about business you may conduct in other country's besides where you are registered for tax purposes?	No	5
15	Is your individual activity or business registered or conducted in preferred tax zone (for instance, free economic zone, offshore jurisdiction)?	No	0
16	Please tell us about your annual turnover, in individual or business activity, which is recorded in cash.	0-10K (none or title of my turnover is in cash)	0
17	Please tell us about your annual turnover, in individual or business activity, which is recorded in cryptocurrency.	0-10K (none or title of my turnover is in cryptocurrency)	0
18	Please tell us about your sources of wealth. Select more than one box if necessary.	Salary, business income	0
19	Please tell us about your sources of wealth. Select more than one box if necessary.	Employment income	0
20	Please select the service(s) you plan to use. Select more than one box if necessary.	Crypto Trading, long term investment, participate in initial exchange offering	0
21	How much do you plan to deposit per year (USD and crypto combined)?	< 10,000	15
22	Please tell us which countries the funds will be received and/or transferred from.	China	0
23	Let us know what your level of experience is with cryptocurrency trading? Please select one	Beginner	0
24	How many years of experience do you have in crypto trading?	< 1 Year	0
25	Are you an immediate family member or a close associate, entrusted, or have been entrusted, with government public functions in any country or international institution? This could be a public official, a government role, a regulatory role or a senior military position, at home or overseas.	No	0

Comment

After 3 attempts

Add Comment

DATE & TIME	FULL NAME	NOTE	COMMENT
6/2/2021 4:16:03 PM			Based on the KYC responses, the Customer is Medium Risk considering the following risk factors: Citizenship of China (31), fund being transferred from China (15) and Occupation of IT (0). Screening is performed against the Customer. There are 7 hits against the searched names. In detail, they are false possible hits disclosed by Full Name Wen March. Overall, KYC Observing Analysis is of the view that the initial AML, CTF assessment result is consistent with the Customer's profile and does not oppose the decision to onboard the Customer with Medium Risk - 51 points.

INTERNAL ID	VALUREX
MANUALRISKSCORE	0
TOTAL RISK SCORE	50
RISK LEVEL	Medium
COMPLYADVANTAGE	0
HITS	
COMPLYADVANTAGE LINK	<a href="#">ComplyAdvantage Link</a>
VERIFICATION	Approved
APPLICATION STATUS	Approved
CATEGORY	Approved By Compliance
NUMBER OF ATTEMPT TO	5
JUNIO	Reset

Risk Score Update History

DATE & TIME	FILE NAME	FILE NAME	ROLE	RISK SCORE	RISK LEVEL
5/5/2022 6:29:24 AM	Auto (System)	Auto (System)		50	Medium

KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
10	Place of birth	China	0
1	Citizenship on the document	China	25
12	Please tell us about your current employment status.	Self-employed	5
13	Please tell us about your occupation or business activity.	Technology and communications-Telecommunication	5
4	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	0
5	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	No	0
6	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10% (income or little of my turnover is in cash)	0
7	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	0-10% (income or little of my turnover is in cryptocurrency)	0
8	Please tell us about your sources of income/funds. Select more than one box if necessary.	Salary / business income, Savings	0
9	Please tell us about your sources of wealth? Select more than one box if necessary.	Employment income	0
10	Please select the service(s) you plan to use. Select more than one box if necessary.	Participate in Initial Exchange Offering	0
11	How much do you plan to deposit per year (USD and crypto combined)?	10 000 100 000	0
2	Please tell us which countries the funds will be received and/or transferred from.	China	15
3	Let us know what your level of experience is with cryptocurrency trading? Please select one.	Beginner	0
4	How many years of experience do you have in crypto trading?	< 1 YEAR	0
5	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	No	0

Comment

ADD A COMMENT...

DATE & TIME	FILE NAME	ROLE	COMMENT
2/25/2022 12:28:45 PM			Manual checking required: a. Full Name matches with Junio record b. DOB matches with Junio record c. Full address provided d. Origin of Funds from US/Canada/Japan - Nil e. No connection to any Unsupported Country f. Discounting of Screening Hits - zero English and Chinese name search hit.  Based on New Business Committee's guidance on Oct 1 2021, it is agreed to onboard the Customer with China residency with Medium risk (50). Full address requested #208642
2/28/2022 9:59:57 AM			



INTERNAL ID	EB8N37
MANUAL RISK SCORE	35
TOTAL RISK SCORE	35
RISK LEVEL	Medium
COUNTRY ADVANTAGE	0
HITS	0
COMPLY ADVANTAGE LINK	<a href="#">ComplyAdvantage Link</a>
LINK	
VERIFICATION	Auto-Approved
APPLICATION STATUS	
CATEGORY	▼ See a item user
NUMBER OF ATTEMPT TO	4
STATUS	Reset

### Risk Score Update History

DATE & TIME	ROLL NAME	ROLL	RISK SCORE	RISK LEVEL
10-2023 6:20:42 PM	Auto (System)	Auto (System)	35	Medium

### Q/C Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
1	Place of birth	China	0
2	Citizenship on the document	China	25
3	Please tell us about your current employment status.	China	5
4	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	Self-employed	0
5	Please tell us about business you may conduct in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	否, 无与政府——自由经济/离岸	0
6	Is your individual activity or business registered or conducted in cash?	No	0
7	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	No	0
8	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10k (none or little of my turnover is in cash)	0
9	Please tell us about your source(s) of income (funds). Select more than one box if necessary.	0-10k (none or little of my turnover is in cryptocurrency)	0
10	Please select the service(s) you plan to use. Select more than one box if necessary.	Salary / business income, Savings	0
11	How much do you plan to deposit per year (USD and crypto combined)?	Employment income, Business profits	5
12	Please tell us which countries the funds will be received and/or transferred from.	Crypto Trading, Long term investment, Participate in initial exchange offering, Crypto payment	0
13	Let us know what your level of experience is with cryptocurrency trading? Please select one	< 10 000	0
14	How many years of experience do you have in crypto trading?	< 1 Year	0
15	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	Taiwan	0
16		Singapore	0
17		Beginner	0
18		< 1 Year	0

### Comment

ADD A COMMENT...

Add Comment

Chinese input of Q13 is Media, Art Design - Freelance 3D Animator, China ID provided can be used as POA.

11/17/2023 5:58:23 AM

COMMENT

Transaction Monitoring Security Question Supporting Documents

INTERNAL ID

MANUAL SCORE

TOTAL RISK SCORE

RISK LEVEL

COMPL. ADVANTAGE

HITS

LINK

COMPL. ADVANTAGE LINK

VERIFICATION

APPLICATION STATUS

CATEGORY

NUMBER OF ATTEMPT TO

JUMBO

0

45

Medium

0

0

Copy Advantage Link

Auto-Approved

▼ Save & Return Later

1

Reset

CYC Questionnaire		ANSWER		RISK RATING
QUESTION SORT ORDER	QUESTION			
1	Place of birth	China	China	0
2	Citizenship on the document	China	China	25
3	Please tell us about your current employment status.	Employed	Employed	0
4	Please tell us about your occupation or business activity.	Health and wellness-Health care	Health and wellness-Health care	5
5	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	No	0
6	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	No	No	0
7	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10K (none or little of my turnover is in cash)	0-10K (none or little of my turnover is in cash)	0
8	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	0-10K (none or little of my turnover is in cryptocurrency)	0-10K (none or little of my turnover is in cryptocurrency)	0
9	Please tell us about your sources of income/funds. Select more than one box if necessary.	Salary / business income, Savings inheritance, Employment income	Salary / business income, Savings inheritance, Employment income	0
10	Please tell us about your sources of wealth? Select more than one box if necessary.	Crypto Trading, Long term investment, Participate in Initial Exchange Offering	Crypto Trading, Long term investment, Participate in Initial Exchange Offering	0
11	Please select the service(s) you plan to use. Select more than one box if necessary.	10 000 100 000	10 000 100 000	15
12	How much do you plan to deposit per year (USD and crypto combined)?	China	China	0
13	Please tell us which countries the funds will be received and/or transferred from.	Beginner	Beginner	0
14	Let us know what your level of experience is with cryptocurrency trading? Please select one	< 1 Year	< 1 Year	0
15	How many years of experience do you have in crypto trading?	No	No	0
16	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.			

Comment

Add a comment...

Add Comment

INTERNAL ID  
MANUAL RISK SCORE  
TOTAL RISK SCORE  
RISK LEVEL  
COMPLY ADVANTAGE  
HITS  
LINK  
VERIFICATION  
APPLICATION STATUS  
CATEGORY  
NUMBER OF ATTEMPT TO  
JUMBO

CSCAAC  
0  
41  
Medium  
0  
[Compliance Link](#)  
Approved  
Approved By Compliance  
1  
RISK

Save

Save & Inform User

KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
	Place of birth	China	0
	Citizenship on the document	China	31
	Please tell us about your current employment status.	Employed	0
	Please tell us about your occupation or business activity.	Technology and communications-information technology	0
	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	0
	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	No	0
	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10k (none or little of my turnover is in cash)	0
	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	0-10k (none or little of my turnover is in cryptocurrency)	0
	Please tell us about your source(s) of income funds. Select more than one box if necessary.	Salary / business income	0
	Please tell us about your source(s) of wealth? Select more than one box if necessary.	Employment income	0
	Please select the service(s) you plan to use. Select more than one box if necessary.	Crypto Trading, Long term investment, Crypto payment	5
	How much do you plan to deposit per year (USD and crypto combined)?	< 10 000	0
	Please tell us which countries the funds will be received and/or transferred from.	Hong Kong	0
	Let us know what your level of experience is with cryptocurrency trading? Please select one	Beginner	0
	How many years of experience do you have in crypto trading?	< 1 Year	0
	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	No	0

Comment

Add a comment...

Add Comment

DATE & TIME

FULL NAME

ROLE

COMMENT

5/18/2021 8:30:14 AM

Based on the KYC responses, the Customer is Medium Risk considering the following risk factors:

The citizenship of customer is China, claimed as employed and engaged in technology and communications-information technology, and the purposes of opening account were Crypto Trading, Long term investment and Crypto payment.

Screening is performed against the customer. There are 7 hits against the searched names. The hits are identified as false hit since either the name or age of persons mentioned in the hits are not matched with the customer's profile and no evidence shows that customer has direct linkage with the company mentioned in the hit.

Email has been sent to the customer due to his country of residency.

Overall, KYC Onboarding Analyst, [REDACTED] is of the view that the initial AML/CTF assessment result is consistent with the Customer's profile and does not oppose the decision to onboard the Customer with Medium Risk (M).

INTERNAL ID

MANUAL RISK SCORE

TOTAL RISK SCORE

RISK LEVEL

COMPL ADVANTAGE

HITS

LINK [Copy Advantage Link](#)

VERIFICATION STATUS

APPLICATION STATUS

CATEGORY

NUMBER OF ATTEMPT TO

Reset

Risk Score Update History

DATE & TIME	FULL NAME	ROLE	RISK SCORE	RISK LEVEL
27 2023 1:25:41 PM	Auto (System)	Auto (System)	50	Medium
27 2023 1:19:26 PM	Auto (System)	Auto (System)	30	Low
27 2023 1:19:15 PM	Auto (System)	Auto (System)	30	Low

NYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
0	Place of Birth	China	0
11	Citizenship on the document	China	25
1	Please tell us about your current employment status.	Employed	0
2	Please tell us about your occupation or business activity.	Other services-Financial services	5
3	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	0
4	Please tell us about individual activity or business registered or conducted in preferential tax zone for instance, free economic zone, offshore jurisdiction?	No	0
5	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	60-90% (most of my turnover is in cash)	0
6	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	0-10% (none or little of my turnover is in cryptocurrency)	0
7	Please tell us about your source(s) of income, funds. Select more than one box if necessary.	Salary / business income	0
8	Please tell us about your source(s) of wealth? Select more than one box if necessary.	Employment income	0
9	Please select the service(s) you plan to use. Select more than one box if necessary.	Crypto Trading, Long term investment, Arbitrage Trading, Participate in Initial Exchange Offering, Crypto payment	5
10	How much do you plan to deposit per year (USD and crypto combined)?	< 10 000	0
11	Please tell us which countries the funds will be received and or transferred from.	China	15
12	Let us know what your level of experience is with cryptocurrency trading? Please select one:	Beginner	0
13	How many years of experience do you have in crypto trading?	< 1 Year	0
14	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	No	0

Comment

Add a comment...

Add Comment

DATE & TIME	FULL NAME	ROLE	COMMENT
2 2 2023 3:39:17 PM			Manual checking required a. Full Name matches with Junio record b. DOB matches with Junio record c. Full address provided and matched with ID which we accepted as valid POA. d. Origin of Funds from US, Canada, Japan - Nil e. No connection to any Unsanctioned Country f. Discounting of Screening Hits - zero English and Chinese name search hit. Based on New Business Committee's guidance on Oct 1 2021, it is agreed to onboard the Customer with China residency with Medium risk (50).



INTERNAL ID	HEROONK
MANUAL RISK SCORE	0
TOTAL RISK SCORE	50
RISK LEVEL	Medium
COMPLIANCE ADVANTAGE	0
HITS	0
COMPLIANCE ADVANTAGE LINK	Compliance Advantage Link
VERIFICATION STATUS	Approved
CATEGORY	Approved by Compliance
NUMBER OF ATTEMPT TO	2
STATUS	Best

Risk Score Update History

DATE & TIME	FULL NAME	ROLE	RISK SCORE	RISK LEVEL
7/2021 8:59:25 AM	Auto (System)	Auto (System)	50	Medium

Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
1	Place of birth	China	25
2	Citizenship on the document	China	0
3	Please tell us about your current employment status.	Employed	5
4	Please tell us about your occupation or business activity.	Technology and communications - information technology	0
5	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	0
6	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	0-10% (none or little of my turnover is in cash)	0
7	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10% (none or little of my turnover is in cryptocurrency)	0
8	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	Salary Business Income, Investments, Cryptocurrency trading	5
9	Please tell us about your source(s) of income funds. Select more than one box if necessary.	Employment income	0
10	Please tell us about your source(s) of wealth? Select more than one box if necessary.	Crypto Trading, Long term investment	0
11	Please select the service(s) you plan to use. Select more than one box if necessary.	10 000 100 000	0
12	How much do you plan to deposit per year (USD and crypto combined)?	China	15
13	Please tell us which countries the fund will be received and/or transferred from.	China	0
14	Let us know what your level of experience is with cryptocurrency trading? Please select one.	Intermediate	0
15	How many years of experience do you have in crypto trading?	3 - 5 Years	0
16	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	No	0

Comment

Add a comment...

Add Comment

DATE & TIME	FULL NAME	ROLE	COMMENT
-------------	-----------	------	---------

11/4/2021 3:53:08 PM

Based on the KYC responses, the Customer is considered Medium Risk. Screening is performed against the Customer. There are 4 hits against the searched name. All hits can be discounted due to name mismatch.

Validated with ID document the full name is consistent with customer submission. The original status "full name differs" can be discounted.

Date of birth has been remediated, now the DOB captured in the admin panel aligns with the ID document provided. The status "DOB differs" can be discounted.

Based New Business Committee's guidance on Oct 1 2021, it is agreed to onboard the Customer with China residency.

Based New Business Committee's guidance on 19 Aug 2021, the case has passed the Simplified Due-Diligence (SDD). KYC Onboarding Analysis is of the view that the initial AML CTR assessment result is consistent with the Customer's profile and does not oppose the decision to onboard this Customer with Medium Risk (Risk Score: 50).

INTERNAL ID 6816435  
MANUAL RISK SCORE 56  
TOTAL RISK SCORE 56  
RISK LEVEL Medium  
COMPLY ADVANTAGE 0  
HITS  
COMPLY ADVANTAGE LINK  
LINK  
VERIFICATION Approved  
APPLICATION STATUS Approved  
CATEGORY Approved By Compliance  
BUSINESS OR ATTEMPT TO Reset  
JUMBO

KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
1	Place of birth	China	0
2	Citizenship on the document	China	3.1
3	Please tell us about your current employment status.	Employed	0
4	Please tell us about your occupation or business activity.	Technology and communications-information technology	5
5	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	0
6	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	0-10% none or little of my turnover is in cash	0
7	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10% none or little of my turnover is in cryptocurrency	0
8	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	Salary Business income, Savings, Loan / Credit	0
9	Please tell us about your source(s) of income (funds). Select more than one box if necessary.	Property sale, Employment income	0
10	Please select the service(s) you plan to use. Select more than one box if necessary.	Crypto Trading, Long term investment, Arbitrage Trading, Participate in Initial Exchange Offering, Crypto payment	5
11	How much do you plan to deposit per year (USD and crypto combined)?	10 000 100 000	0
12	Please tell us which countries the funds will be received and/or transferred from.	China Switzerland	1.5
13	Let us know what your level of experience is with cryptocurrency trading. Please select one: How many years of experience do you have in crypto trading? Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	Beginner < 1 Year No	0 0 0

Comment

Add a comment...

Add Comment

DATE & TIME

RUL NAME

ROLE

COMMENT

Based on the KYC responses, the Customer is Medium Risk considering the following risk factors:

1. Citizenship on the document is China
2. Occupation or business activity is Technology and communications-information technology
3. Selected services include Crypto Trading, Long term investment, Arbitrage Trading, Participate in Initial Exchange Offering, Crypto payment
4. Funds will be received and/or transferred from China & Switzerland

Screening is performed against the Customer. There is no hit against the searched English name. There are 2 hits against the searched Chinese name.

All Hits can be discounted due to name mismatch.

Notification email has been sent to the Customer due to his country of residency in China

Overall, KYC Onboarding Analyst [REDACTED] is of the view that the initial ABU, CTF assessment result is consistent with the Customer's profile and does not oppose the decision to onboard the Customer with Medium Risk (RSK SCORE 50).

[illegible]

## CYC Questionnaire

	Country and company	Question	Answer
1	China	China	China
2	China	China	China
3	China	China	China
4	China	China	China
5	China	China	China
6	China	China	China
7	China	China	China
8	China	China	China
9	China	China	China
10	China	China	China
11	China	China	China
12	China	China	China
13	China	China	China
14	China	China	China
15	China	China	China
16	China	China	China
17	China	China	China
18	China	China	China
19	China	China	China
20	China	China	China
21	China	China	China
22	China	China	China
23	China	China	China
24	China	China	China
25	China	China	China
26	China	China	China
27	China	China	China
28	China	China	China
29	China	China	China
30	China	China	China
31	China	China	China
32	China	China	China
33	China	China	China
34	China	China	China
35	China	China	China
36	China	China	China
37	China	China	China
38	China	China	China
39	China	China	China
40	China	China	China
41	China	China	China
42	China	China	China
43	China	China	China
44	China	China	China
45	China	China	China
46	China	China	China
47	China	China	China
48	China	China	China
49	China	China	China
50	China	China	China

## Comment

[illegible]

INTERNAL ID: VAM075  
MANUAL REVIEW: 0  
TO BE REVIEWED: 1  
RISK LEVEL: Medium  
COMPLIANCE: 0  
LINK: [Compliance Page](#)  
VERIFICATION: Auto-Approved  
APPROVAL STATUS:   
CATEGORY:   
NUMBER OF ATTEMPTS TO: 2  
Reset

Risk Score Update History

DATE TIME	REAL NAME	MODE	RISK SCORE	RISK LEVEL
1 20 2023 7:27:24 AM	Auto System	Auto System	50	Medium
1 20 2023 7:26:12 AM	Auto System	Auto System	50	Medium
1 20 2023 7:23:40 AM	Auto System	Auto System	50	Medium
1 20 2023 7:24:58 AM	Auto System	Auto System	50	Medium
1 20 2023 7:21:36 AM	Auto System	Auto System	35	Medium
1 20 2023 7:20:53 AM	Auto System	Auto System	35	Medium
1 20 2023 7:19:06 AM	Auto System	Auto System	30	Low
1 20 2023 7:18:23 AM	Auto System	Auto System	30	Low
1 20 2023 7:17:24 AM	Auto System	Auto System	30	Low
1 20 2023 7:16:36 AM	Auto System	Auto System	30	Low
1 20 2023 7:15:12 AM	Auto System	Auto System	30	Low
1 20 2023 7:14:40 AM	Auto System	Auto System	30	Low
1 20 2023 7:14:20 AM	Auto System	Auto System	30	Low
1 20 2023 7:13:43 AM	Auto System	Auto System	25	Low
1 20 2023 7:13:52 AM	Auto System	Auto System	0	Low

KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
10	Place of birth	China	0
11	Citizenship on the document	China	25
12	Please tell us about your current employment status.	Student	0
14	Please tell us about business you may conduct in other country(ies) besides where you are registered for tax purposes?	No	0
15	Is your individual identity or business registered or conducted in preferred tax zone (for instance, free economic zone, offshore jurisdiction)?	No	0
16	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	< 100,000 USD or title of my turnover is in cash	0
17	Please tell us about your turnover, in individual or business activity, which is handled in cryptocurrency.	Indifference	0
18	Please tell us about your turnover of crypto funds, which more than one box if necessary.	Crypto Trading, Long term investment, Crypto payment	0
19	Please select the number of crypto funds more than one box if necessary.	< 10 USD	5
20	Please select the number of crypto funds more than one box if necessary.	< 10,000	15
21	Please tell us about your turnover of crypto funds more than one box if necessary.	Indifference	0
22	Please tell us about your turnover of crypto funds more than one box if necessary.	Indifference	0
23	Let us know what your type of experience is with cryptocurrency trading. Please select one:	Beginner	0
24	How many years of experience do you have in crypto trading?	< 1 Year	0
25	Are you an immediate family member of a close associate, employee, or have been related, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	No	0

Comment

Add a comment...

Add Comment



Profile Balances Ledger Deposits Deposit Addresses Withdrawals Redemption Limits Withdrawal Addresses Bank Accounts Active Orders Completed Orders Trades Tiers Mail Queue Notifications Activity Error Log Export Attempts Referrals Referral Bonuses

Whitelisted IP's Risk Scoring Transaction Monitoring Security Question Supporting Documents

INTERNAL ID LNC8YPA  
MANUALRISKSCORE 0 Save  
TOTAL RISK SCORE 30  
RISK LEVEL LOW  
COMPLIADVANTAGE 10  
HITS  
COMPLIADVANTAGE LINK  
Verify Advantage Link

VERIFICATION APPROVED  
APPLICATION STATUS Approved  
CATEGORY Approve By: Compliance Save & Inform User  
NUMBER OF ATTEMPT TO 3  
JUMO Reset

### Risk Score Update History

DATE & TIME	FULL NAME	ROLE	RISK SCORE	RISK LEVEL
01/31/2021 8:29:39 AM	Auto (System)	Auto (System)	30	Low

### KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
10	Place of Birth	Taiwan	0
11	Citizenship on the document	Taiwan	25
12	Please tell us about your current employment status.	Employed	0
13	Please tell us about your occupation or business activity.	提合科技工程師	0
14	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	0
15	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	No	0
16	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	60-90k (most of my turnover is in cash)	0
17	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	0-10k (none or little of my turnover is in cryptocurrency)	0
18	Please tell us about your source(s) of income/funds. Select more than one box if necessary.	Salary / business income	0
19	Please tell us about your source(s) of wealth? Select more than one box if necessary.	Inheritance, Employment Income	5
20	How much do you plan to deposit per year (USD and crypto combined)?	Crypto Trading, Long term investment, Arbitrage Trading, Participate in Initial Exchange Offering, Crypto payment	0
21	Let us know what your level of experience is with cryptocurrency trading? Please select one:	< 10 000	0
22	How many years of experience do you have in crypto trading?	Taiwan	0
23	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	Beginner	0
24		< 1 Year	0
25		No	0

### Comment

Add a comment...

Add Comment

DATE & TIME	FULL NAME	ROLE	COMMENT
11/9/2021 10:14:48 AM			Based on the KYC responses, the Customer is considered Low Risk. Screening is performed against the Customer. There are 13 hits against the searched English name. There are 10 hits against the searched Chinese name. All hits can be discounted due to name mismatch.  The Customer's occupation is composite materials engineer.  Overall, KYC Onboarding Analyst [REDACTED] is of the view that the initial AML/CTF assessment result is consistent with the Customer's profile and does not oppose the decision to onboard the Customer with Low Risk [RISK SCORE 30].

Profile Balances Ledger Deposits Deposit Addresses Withdrawals Redemption Limits Withdrawal Addresses Bank Accounts Active Orders Completed Orders Trades Tiers Mail Queue Notifications Activity Error Log Export Attempts Referrals Referral Bonuses

Whistleblow Info **Risk Scoring** Transaction Monitoring Security Question Supporting Documents

INTERNAL ID 0052815  
MANUAL RISK SCORE 60  
TOTAL RISK SCORE 60  
RISK LEVEL Medium  
COMPLY ADVANTAGE 0  
HITS  
COMPLY ADVANTAGE LINK [Comply Advantage Link](#)  
VERIFICATION Approved  
APPLICATION STATUS Approved By Compliance  
CATEGORY JUMBO  
NUMBER OF ATTEMPT TO 3  
JUMBO Reset

Save & return user

### KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
10	Place of birth	China	0
11	Citizenship on the document	United Kingdom	0
12	Please tell us about your current employment status.	Retired	0
13	Please tell us about your occupation or business activity.	Importer and wholesaler	0
14	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	NO	0
15	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	Yes Hong Kong	0
16	Please tell us about your annual turnover. In individual or business activity, which is handled in cash.	60-90% most of my turnover is in cash	0
17	Please tell us about your annual turnover. In individual or business activity, which is handled in cryptocurrency.	0-10% (none or little of my turnover is in cryptocurrency)	0
18	Please tell us about your source(s) of income / funds. Select more than one box if necessary.	Pension / social benefits, investments, savings	0
19	Please tell us about your source(s) of wealth? Select more than one box if necessary.	Property sale, Employment income, Business profits	0
20	Please select the service(s) you plan to use. Select more than one box if necessary.	Crypto Trading, Long term investment, Crypto payment	5
21	How much do you plan to deposit per year (USD and crypto combined)?	10 000 100 000	0
22	Please tell us which countries the funds will be received and / or transferred from.	Hong Kong New Zealand United States	15
23	Let us know what your level of experience is with cryptocurrency trading? Please select one:	Beginner	0
24	How many years of experience do you have in crypto trading?	< 1 Year	0
25	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	NO	0

### Comment

Add a comment...

### Add Comment

DATE & TIME FULL NAME ROLE COMMENT

4/29/2021 1:19:19 PM

Based on the KYC responses, the Customer is Medium Risk considering the following risk factors according Customer Risk Model for Retail Customer:

Per Customer's reply in Zendesk, he was a green card holder until he went through official procedures with US embassy in Hong Kong and gave up his green card permanently since 2010. The reason for him to own a Bank of America account (joint account with son) is because he could support his son for college education i.e. daily expenses, and he may remit some funds to his son for further investment since he does not trust the Hong Kong government.

Based on KYC questionnaire, customer's score is 20 points. In addition, client is retired and planning to deposit USD10K - 100K annually which accounts for additional 40 points. In total, client's risk score is 60 points which is not shown in KYC questionnaire.

Screening is performed against the Customer and there is 0 hit. Overall, Senior KYC onboarding analyst [REDACTED] is of the view that the initial AML CTR assessment result is consistent with Customer's profile and does not oppose the decision to onboard the Customer with Medium Risk - Risk Score 60.

Profile Balances Ledger Deposits Deposit Addresses Withdrawals Redemption Limits Withdrawal Addresses Bank Accounts Active Orders Completed Orders Trades Tiers Mail Queue Notifications Activity Error Log Exploit Attempts Referrals Referral Bonuses

Whitelisted IP's Risk Scoring Transaction Monitoring Security Question Supporting Documents

INTERNAL ID

MANUAL RISK SCORE

TOTAL RISK SCORE

RISK LEVEL

HITS

COMPLIANCE ADVANTAGE

LINK

VERIFICATION

APPLICATION STATUS

CATEGORY

NUMBER OF ATTEMPT TO

REMARK

0

30

Low

3

[Compliance Advantage Link](#)

Approved

Approved By Compliance

1

Reset

Save & Inform User

### Risk Score Update History

DATE & TIME	FULL NAME	ROLE	RISK SCORE	RISK LEVEL
01/15/2021 10:16:52 AM	Auto (System)	Auto (System)	30	Low
01/15/2021 10:14:50 AM	Auto (System)	Auto (System)	30	Low

### KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
10	Place of birth	China	0
1	Citizenship on the document	China	25
2	Please tell us about your current employment status.	Unemployed	0
3	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	0
4	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	No	0
5	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10k (none or little of my turnover is in cash)	0
6	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	0-10k (none or little of my turnover is in cryptocurrency)	0
7	Please tell us about your sources of income/funds. Select more than one box if necessary.	Savings	0
8	Please tell us about your sources of income/funds. Select more than one box if necessary.	Employment Income	0
9	Please select the service(s) you plan to use. Select more than one box if necessary.	Crypto Trading, Long term investment, Crypto payment	5
10	How much do you plan to deposit per year (USD and crypto combined)?	< 10 000	0
1	Please tell us which countries the funds will be received and/or transferred from.	Korea (South)	0
2	Let us know what your level of experience is with cryptocurrency trading? Please select one:	Beginner	0
3	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	< 1 Year	0
4		No	0

### Comment

Add a comment...

Add Comment

DATE & TIME

FULL NAME

ROLE

COMMENT

11:17:2021 1:11:54 PM

Based on the KYC responses, the Customer is Low Risk considering the following risk factors. Customer is Citizen of China. Screening is performed against the Customer's English and Chinese Characters and there are 14 hits and all name mismatch. Overall, Senior KYC onboarding analyst [REDACTED] is of the view that the Initial AML/CTF assessment result is consistent with Customer's profile and does not oppose the decision to onboard the Customer with Low Risk - Risk Score 30.

Profile Balances Ledger Deposits Deposit Addresses Withdrawals Redemption Limits Withdrawal Addresses Bank Accounts Active Orders Completed Orders Trades Tiers Mail Queue Notifications Activity Error Log Exploit Attempts Referrals Referral Bonuses

Whitelisted IPs Risk Scoring Transaction Monitoring Security Question Supporting Documents

INTERNAL ID: [0] [See](#)

MANUAL RISK SCORE: 30

TOTAL RISK SCORE: 30

RISK LEVEL: Low

COMPLY ADVANTAGE: 0

HITS: 0

COMPLY ADVANTAGE LINK: [Comply-Advantage Link](#)

LINK: [Comply-Advantage Link](#)

VERIFICATION: Approved

APPLICATION STATUS: Approved

CATEGORY: Approved By: Compliance

NUMBER OF ATTEMPT TO: 1 [Reset](#)

JUMBO

### Risk Score Update History

DATE & TIME	FULL NAME	ROLE	RISK SCORE	RISK LEVEL
11/11/2021 3:08:08 PM	Auto (System)	Auto (System)	30	Low
11/11/2021 3:07:11 PM	Auto (System)	Auto (System)	30	Low

### KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
10	Place of Birth	Singapore	0
11	Citizenship on the document	Singapore	25
12	Please tell us about your current employment status.	Employed	0
13	Please tell us about your occupation or business activity.	Technology and communications-Telecommunication	5
14	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	0
15	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	No	0
16	Please tell us about your annual turnover: in individual or business activity, which is handled in cash.	0-10K (none or little of my turnover is in cash)	0
17	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	0-10K (none or little of my turnover is in cryptocurrency)	0
18	Please tell us about your sources of income/funds. Select more than one box if necessary.	Salary / Business Income	0
19	Please tell us about your sources of wealth? Select more than one box if necessary.	Employment Income	0
20	Please select the service(s) you plan to use: select more than one box if necessary.	Crypto Trading, Long term investment, Participate in initial Exchange Offering	0
21	How much do you plan to deposit per year (USD and crypto combined)?	1 below in Himalaya Exchange as the future	0
22	Please tell us which countries the funds will be received and/or transferred from.	10 000 100 000	0
23	Let us know what your level of experience is with cryptocurrency trading? Please select one:	Singapore	0
24	How many years of experience do you have in crypto trading?	Intermediate	0
25	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	1 - 3 Years	0

### Comment

Add a comment...

Add Comment

DATE & TIME	FULL NAME	ROLE	COMMENT
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11/22/2021 11:06:03 AM

Based on the KYC responses, the Customer is considered Low Risk. Screening is performed against the Customer with 1 hit (Chinese) and 0 hit (English). Discounted due to name mismatch.

Customer's name matches that in the ID provided. The HEX status of 'rejected' due to 'full name differs' is hence ignored.

Overall, Compliance Officer [REDACTED] is of the view that the initial AML/CTF assessment result is consistent with the Customer's profile and does not oppose the decision to onboard the Customer with Low Risk 30.



Profile Balances Ledger Deposits Deposit Addresses Withdrawals Redemption Limits Withdrawal Addresses Bank Accounts Active Orders Completed Orders Trades Tiers Mail Queue Notifications Activity Error Log Export Attempts Referrals Referral Bonuses

Whitelisted IP's **Risk Scoring** Transaction Monitoring Security Question Supporting Documents

INTERNAL ID 5128173  
MANUAL RISK SCORE 0   
TOTAL RISK SCORE 46  
RISK LEVEL Medium  
COMPLIANCE ADVANTAGE 0  
HITS  
COMPLIANCE ADVANTAGE [Click here to view details](#)  
LINK  
VERIFICATION Approved  
APPLICATION STATUS Approved By Compliance   
CATEGORY  
NUMBER OF ATTEMPTS TO 7   
JUMBO

### KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
10	Place of birth	China	0
11	Citizenship on the document	China	31
12	Please tell us about your current employment status.	Employed	0
13	Please tell us about your occupation or business activity.	跨境电商	0
14	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	0
15	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	No	0
16	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10k (none or little of my turnover is in cash)	0
17	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	0-10k (none or little of my turnover is in cryptocurrency)	0
18	Please tell us about your sources of income funds. Select more than one box if necessary.	Salary / business income, loan / Credit	0
19	Please tell us about your sources of wealth? Select more than one box if necessary.	Employment income, Business profits	0
20	Please select the service(s) you plan to use. Select more than one box if necessary.	Crypto Trading, Long term investment	0
21	How much do you plan to deposit per year (USD and crypto combined)?	< 10 000	15
22	Please tell us which countries the funds will be received and/or transferred from.	China	0
23	Let us know what your level of experience is with cryptocurrency trading? Please select one.	Beginner	0
24	How many years of experience do you have in crypto trading?	< 1 Year	0
25	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	No	0

### Comment

ADD A COMMENT...

Add Comment

DATE & TIME

FILE NAME

ROLE

COMMENT

Based on the KYC responses, the Customer is Medium Risk considering the following risk factors:  
-Chinese citizenship per China ID (31)  
-Customer told us the funds will be received and/or transferred from China (15)  
So, the total risk rating score is 31+15=46.

After checking, the name customer inputted in system is matched with his China ID. The original status "full name differ" can be discounted. Screening is performed against the Customer. There are 2 hits against the searched Chinese name. All the potential hits are false hits as full name mismatch.

Customer is working as a surrogate driver.

Overall, KYC Onboarding Analyst [REDACTED] is of the view that the initial AML-CTF assessment result is consistent with the Customer's profile and does not oppose the decision to onboard the Customer with Medium Risk (Risk score 46).

6/2/2021 10:40:06 AM



INTERNAL ID  
5589ADQ

MANUAL RISK SCORE  
0

TOTAL RISK SCORE  
50

RISK LEVEL  
Medium

COMPL ADVANTAGE  
2

COMPL ADVANTAGE LINK  
[Empty Advantage Link]

LINK  
[Empty Advantage Link]

VERIFICATION  
Approved

APPLICATION STATUS  
Approved

CATEGORY  
Approved (By Compliance)

NUMBER OF ATTEMPT TO  
5

STATUS  
Reset

Save & Inform User

KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
1	Place of Birth	Taiwan	0
2	Citizenship on the document	Taiwan	25
3	Please tell us about your current employment status.	Retired	0
4	Please tell us about your occupation or business activity.	Health and wellness-Health care	5
5	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	0
6	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	No	0
7	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10% (none or little of my turnover is in cash)	0
8	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	0-10% (none or little of my turnover is in cryptocurrency)	0
9	Please tell us about your source(s) of income/funds. Select more than one box if necessary.	Pension / Social benefits	0
10	Please tell us about your source(s) of wealth? Select more than one box if necessary.	Inheritance	0
11	Please select the service(s) you plan to use. Select more than one box if necessary.	Crypto Trading, Long term investment, Arbitrage Trading, Participate in Initial Exchange Offering, Crypto payment	5
12	How much do you plan to deposit per year (USD and crypto combined)?	< 10,000	0
13	Please tell us which countries the funds will be received and/or transferred from.	Taiwan	15
14	Let us know what your level of experience is with cryptocurrency trading? Please select one.	Australia	0
15	How many years of experience do you have in crypto trading?	United States	0
16	Are you, an immediate family member or a close associate, entrusted, or have been entrusted with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	Beginner	0
17		< 1 Year	0

Comment

Add a comment...

Add Comment

DATE & TIME	FULL NAME	ROLE	COMMENT
-------------	-----------	------	---------

6/11/2021 4:41:34 PM

6/9/2021 10:36:56 AM

Based on the KYC responses, the Customer is Medium Risk considering the following risk factors:

[23] Citizenship: Taiwan

[15] Funds will be received and/or transferred from: Taiwan, Australia, United States. As per email #92746, customer declared she has no relationship with the US (neither a US citizen nor US tax resident). She declared that she may open a US account in the future.

[5] occupation or business activity: Health and wellness-Health care

[5] service(s) you plan to use: Crypto Trading, Long term investment, Arbitrage Trading, Participate in Initial Exchange Offering, Crypto payment

Screening is performed against the Customer. There are 2 hits (Chinese) and 2 hits (English) against the searched names. 2 hits are discounted due to non-AML CTR related and location difference. All the remaining hits are discounted due to name mismatch.

Overall, KYC Onboarding Analysis [REDACTED] is of the view that the Initial AML CTR assessment result is consistent with the Customer's profile and does not oppose the decision to onboard the Customer with Medium Risk SO.

#92746 SOF

Profile Balances Ledger Deposits Deposit Addresses Withdrawals Redemption Limits Withdrawal Addresses Bank Accounts Active Orders Completed Orders Trades Tiers Mail Queue Notifications Activity Error Log Export Attempts Referrals Referral Bonuses

Whitelisted IPs Risk Scoring Transaction Monitoring Security Question Supporting Documents

INTERNAL ID340JMRK

MANUAL RISK SCORE0

TOTAL RISK SCORE36

RISK LEVELMedium

COMPLY ADVANTAGE HITS0

COMPLY ADVANTAGE LINKComply Advantage Link

VERIFICATIONApproved

APPLICATION STATUSApproved

CATEGORYApproved By Compliance

NUMBER OF ATTEMPT TO1

NUMIOReset

Save & Inform User

### KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
10	Place of birth	China	0
11	Citizenship on the document	China	31
12	Please tell us about your current employment status.	Employed	0
13	Please tell us about your occupation or business activity.	餐饮服务	0
14	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	0
15	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, off-shore jurisdiction)?	No	0
16	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	90-100% (all or almost all of my turnover is in cash)	0
17	Please tell us about your sources of income / funds. Select more than one box if necessary.	0-10% (none or little of my turnover is in cryptocurrency)	0
18	Please select the service(s) you plan to use. Select more than one box if necessary.	Salary / business income, Savings	0
19	How much do you plan to deposit per year USD and crypto combined?	Employment income	0
20	Please tell us which countries the funds will be received and / or transferred from.	Crypto Trading, Long term investment, Participate in Initial Exchange Offering, Crypto payment	5
21	Let us know what your level of experience is with cryptocurrency trading? Please select one.	< 10 000	0
22	How many years of experience do you have in crypto trading?	Singapore	0
23	Are you an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	Beginner	0
24		< 1 Year	0
25		No	0

### Comment

Add a comment...

Add Comment

DATE & TIME	FULL NAME	ROLE	COMMENT
-------------	-----------	------	---------

5/12/2021 1:02:46 PM

Based on the KYC responses, the Customer is Medium Risk considering the following risk factors:  
-Chinese citizenship on per China Passport (31)  
-Customer chose Crypto Trading, Long term investment, Participate in Initial Exchange Offering, Crypto payment as the services he plan to use (5)  
So, the total risk rating score is 31+5=36.  
Screening is performed against the Customer. There are 4 hits against the searched Chinese name and 0 hit against the English name. All the potential hits can be discounted due to image, full name mismatch.  
Overall, KYC Onboarding Analysis of the view that the initial AML, CTF assessment result is consistent with the Customer's profile and does not oppose the decision to onboard the Customer with medium risk (Risk score 36).

INTERNAL ID

AAU21UA

MANUAL RISK SCORE

0

Save

TOTAL RISK SCORE

10

RISK LEVEL

Low

COMPLY ADVANTAGE

HITS

COMPLY ADVANTAGE

0

LINK

ComplyAdvantage Link

VERIFICATION

Auto-Approved

CATEGORY

Auto-Approved

NUMBER OF ATTEMPT TO

2

Reset

JUMIO

Save & Inform User

Risk Score Update History

DATE & TIME	FULL NAME	ROLE	RISK SCORE	RISK LEVEL
02/28/2021 11:57:00 AM	Auto (System)	Auto (System)	10	Low

KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
10	Place of birth	United Kingdom	0
11	Citizenship on the document	United Kingdom	0
12	Please tell us about your current employment status.	Employed	0
13	Please tell us about your occupation or business activity.	Services - Legal Services	5
14	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	0
15	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	No	0
16	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0 - 10% (none or little of my turnover is in cash)	0
17	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	0 - 10% (none or little of my turnover is in cryptocurrency)	0
18	Please tell us about your source(s) of income / funds. Select more than one box if necessary.	Salary / Business Income	0
19	Please select the service(s) you plan to use. Select more than one box if necessary.	Crypto Trading, Long term investment, Arbitrage Trading, Participate in Initial Exchange Offering, Crypto payment	5
20	How much do you plan to deposit per year (USD and crypto combined)?	10 000 100 000	0
21	Please tell us which countries the funds will be received and /or transferred from.	United Kingdom	0
22	Let us know what your level of experience is with cryptocurrency trading? Please select one:	Beginner	0
23	How many years of experience do you have in crypto trading?	< 1 Year	0
24	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	No	0

Comment

Add a comment...

Add Comment

NUMBER OF ATTEMPT TO 5 Reset

INTERNAL ID	51	STATUS	See
MANAGER SCORE	51		
TOTAL RISK SCORE	51		
RISK LEVEL	Medium		
COMPLAINT RATING	1.2		
COMPLAINT RATING	1.2		
LINK	<a href="#">Example Application Link</a>		
VERIFICATION	Approved		
APPLICATION STATUS	Approved By: Confidence		
CATEGORY			
NUMBER OF ATTEMPT TO	5		
STATUS	Reset		

See a report now

institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.

	Page of 10/11	QUESTION	ANSWER	MARK
0		Creating on the document.	China	
31		Please tell us about your current employment status.	China	
0		Please tell us about your occupation or business activity.	Employed	
100		Please tell us about your current employment status.	Other services-Non-profit, charity	
0		Please tell us about your occupation or business activity.	No	
0		Please tell us about your occupation or business activity.	No	
0		Please tell us about your occupation or business activity.	0-10% (none or little of my turnover is in cash)	
0		Please tell us about your occupation or business activity.	0-10% (none or little of my turnover is in cryptocurrency)	
0		Please tell us about your occupation or business activity.	Salary / business income	
0		Please tell us about your occupation or business activity.	Employment income	
0		Please tell us about your occupation or business activity.	Crypto Trading, long term investment, participate in initial Exchange Offering, Crypto payment	
3		Please tell us about your occupation or business activity.	< 10 000	
0		Please tell us about your occupation or business activity.	China	
15		Please tell us about your occupation or business activity.	United States	
0		Please tell us about your occupation or business activity.	Beginner	
0		Please tell us about your occupation or business activity.	< 1 year	
0		Please tell us about your occupation or business activity.	NO	

2021 0 04 20 AM

9/20/2023 2:08:25 PM

2023 10 11 16 AM

**COMPLAINT** Notification email has been sent to the Customer due to his complaint on China

agreed with analyst's assessment to reduce risk level from Prohibitive (13) to Moderate (5)

A major risk factor contributing to the elevated risk is that customer selected occupation category at Non-profit change

by 100

with Committee's designation and without relating to the Committee.

(1) Costa citizenship per Costa ID (11)

(2) The occupation is Other service-Non-profit, charity (100)

the United States, and the

Editorial confirmed he is not a US citizen and does not live and work here in the US.

Screening is performed against the Customer. There are 14 hits against the searched Customer name. All the potential hits can be discovered due to full name and email.

Email Sent to customer for clarification on the occupation and GOW (order #76938)

the three Other services. With-profit, clearly because there is no teacher option.

according to the KIC questionnaire, the Customer's wealth is accumulated from employment income

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Overall, KTC's expanding analysis of the view that the initial AMI CTR assessment result is consistent with the Customer's profile. Customer Account does not support a decision to

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20

30

40



Profile Balances Ledger Deposits Deposit Addresses Withdrawals Redemption Limits Withdrawal Addresses Bank Accounts Active Orders Completed Orders Trades Tiers Mail Queue Notifications Activity Error Log Export Attempts Referrals

Referral Bonuses Withhelded IPS Risk Scoring Transaction Monitoring Security Question Supporting Documents

INTERNAL ID	V9W73H5
MANUAL RISK SCORE	0 <input type="text"/> Save
TOTAL RISK SCORE	40
RISK LEVEL	Medium
COMPLYADVANTAGE	0
HTS	
COMPLYADVANTAGE LINK	<a href="#">ComplyAdvantage Link</a>
VERIFICATION	Approved
APPLICATION STATUS	Approved By Compliance
CATEGORY	Approved By Compliance
NUMBER OF ATTEMPT TO	1
JUMIO	Reset

## KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
10	Place of birth	China	0
11	Citizenship on the document	China	25
12	Please tell us about your current employment status.	Retired	0
13	Please tell us about your occupation or business activity.	Housewife	0
14	Please tell us about business you may conduct in other country(ies) besides where you are registered for tax purposes?	No	0
15	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	No	0
16	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10% (none or little of my turnover is in cash)	0
17	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	0-10% (none or little of my turnover is in cryptocurrency)	0
18	Please tell us about your source(s) of income/funds. Select more than one box if necessary.	Savings	0
19	Please select the service(s) you plan to use. Select more than one box if necessary.	Employment Income	0
20	How much do you plan to deposit per year (USD and crypto combined)?	Long term investment	0
21	Please tell us which countries the funds will be received and/or transferred from.	< 10 000	0
22	Let us know what your level of experience is with cryptocurrency trading? Please select one:	China	15
23	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	Beginner	0
24		< 1 Year	0
25		No	0

## Comment

Add a comment...

Add Comment

DATE & TIME

FULL NAME

ROLE

COMMENT

6/10/2021 3:14:28 PM

Based on the KYC responses, the Customer is Medium Risk considering the following risk factors: Citizenship of China (25), and fund being transferred from China (15)

Screening is performed against the Customer. There are 0 hits against the searched names. In detail, they are false possible hits discounted by Full Name Not Match.

Overall, KYC Onboarding Analyst [REDACTED] is of the view that the initial AML/CTF assessment result is consistent with the Customer's profile and does not oppose the decision to onboarding the Customer with Medium Risk - 40 points.

CONFIDENTIAL



**INTERNAL ID** 2023-02-24-14:44  
**TOTAL RISK SCORE** 80  
**RISK LEVEL** High  
**COMPLIANCE RISK** 2  
**APPROVAL STATUS** Approved  
**APPROVAL TO** Risk  
**APPROVAL TO** Risk

**APPROVAL STATUS** Approved  
**APPROVAL TO** Risk  
**APPROVAL TO** Risk

**APPROVAL STATUS** Approved  
**APPROVAL TO** Risk  
**APPROVAL TO** Risk

**APPROVAL STATUS** Approved  
**APPROVAL TO** Risk  
**APPROVAL TO** Risk

**APPROVAL STATUS** Approved  
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**APPROVAL TO** Risk  
**APPROVAL TO** Risk

**APPROVAL STATUS** Approved  
**APPROVAL TO** Risk  
**APPROVAL TO** Risk



INTERNAL ID  
UN508WV

MANUAL RISK SCORE  
TOTAL RISK SCORE  
30

RISK LEVEL  
Low

COMPLY ADVANTAGE  
HITS  
0

COMPLY ADVANTAGE LINK  
ComplyAdvantage Link

VERIFICATION  
APPLICATION STATUS  
Approved

CATEGORY  
NUMBER OF ATTEMPT TO  
1

NUMBER OF ATTEMPT TO  
JUMBO  
Reset

State & Address Link

KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
10	Place of birth	China	0
11	Citizenship on the document	China	23
12	Please tell us about your current employment status.	Employed	0
13	Please tell us about your occupation or business activity.	Technology and communication- information technology	5
14	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	0
15	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	No	0
16	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10k (none or little of my turnover is in cash)	0
17	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	0-10k (none or little of my turnover is in cryptocurrency)	0
18	Please tell us about your source(s) of income/ funds. Select more than one box if necessary.	Salary, business income	0
19	Please tell us about your source(s) of wealth? Select more than one box if necessary.	Employment income	0
20	Please select the service(s) you plan to use. Select more than one box if necessary.	Long term investments	0
21	How much do you plan to deposit per year (USD and crypto combined)?	10 000 100 000	0
22	Please tell us which countries the funds will be received and/or transferred from.	Switzerland	0
23	Let us know what your level of experience is with cryptocurrency trading? Please select one.	Intermediate	0
24	How many years of experience do you have in crypto trading?	< 1 Year	0
25	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	No	0

Comment

Add a comment...

Add Comment

DATE & TIME  
4/27/2021 11:13:54 AM

FULL NAME

ROLE

COMMENT  
Based on the KYC responses, the Customer is considered Low Risk. Screening is performed against the Customer's English and Chinese names with 0 hits.  
Email notification has also been sent to the Customer due to his country of residency in China.  
Overall, Senior KYC Onboarding Analyst [REDACTED] is of the view that the initial AML/CTF assessment result is consistent with the Customer's profile and does not oppose the decision to onboard the Customer with Low Risk (30).

[illegible]

INTERNAL ID	ISCTTIC
MANUAL SCORE	8
TOTAL RISK SCORE	30
RISK LEVEL	Low
CUMULATIVE RISK	0
COMPLAINTS	0
COMPLAINT RATE	0%
COMPLAINTS PER 1,000	0
LINK	<a href="#">View Details</a>
VERIFICATION	Auto-Approved
APPLICATION STATUS	Pending Review
CATEGORY	General Inquiry
NUMBER OF ATTEMPTS TO JUNDO	Retried

### Risk Score Update History

	DATE TIME	FULL NAME	ROLE	HRD SCORE	EXP LEVEL
3	6/2022	4/6/08 AM	Auto System	30	Low
1	6/2022	4/12/03 AM	Auto System	30	Low
3	6/2022	4/31/48 AM	Auto System	30	Low
3	6/2022	4/30/14 AM	Auto System	30	Low
3	6/2022	4/48/59 AM	Auto System	30	Low
3	6/2022	4/48/16 AM	Auto System	25	Low
3	6/2022	4/48/02 AM	Auto System	25	Low
3	6/2022	4/47/09 AM	Auto System	25	Low
3	6/2022	4/46/51 AM	Auto System	25	Low
3	6/2022	4/46/18 AM	Auto System	25	Low
3	6/2022	4/39/26 AM	Auto System	25	Low
3	6/2022	4/39/04 AM	Auto System	0	Low

## KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER
10	Place of Birth	China
11	Citizenship on the document	China
12	Please tell us about your current employment status.	Employed
13	Please tell us about your occupation or business activity.	银行, 资产管理, 基金风险管理
14	Please tell us about business you may conduct in other countries/territories where you are required for tax purposes?	No
15	Is your individual activity or business registered or conducted in preferential tax zones (for instance, free economic zone, offshore jurisdiction)?	No
16	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10k (none or little of my turnover is in cash)
17	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrencies	0-10k (none or little of my turnover is in cryptocurrency)
18	Please tell us about your sources of income/ funds. Select more than one box, if necessary	Salary, Business Income, Savings
19	Please select the service(s) you plan to use. Select more than one box, if necessary	Employment Income, Business profits
20	How much do you plan to deposit per year (USD and crypto combined)?	Crypto Trading, Long term investment, Participate in Initial Exchange Offering, Crypto payment
21	Let us know which your funds will be received and/ or transferred from.	< 10,000
22	Let us know which your work of experience is with cryptocurrency trading? Please select one	Taiwan
23	How many years of experience do you have in crypto trading?	Beginner
24	Are you, an immediate family member or a close associate, employed or have been employed, with prominent public functions in any country or international institution? This could be a public office, a governmental role, a regulatory role or a senior military position, a member of oversight	No

Comment	Add Comment	DATE & TIME	FULL NAME	ROLE	COMMENT
		15, 2022 12:07:58 PM			DDS Staff's Customer report

Profile Balances Ledger Deposits Deposit Addresses Withdrawals Redemption Limits Withdrawal Addresses Bank Accounts Active Orders Completed Orders Trades Tiers Mail Queue Notifications Activity Error Log Export Attempts Referrals Referral Bonuses

Whitelisted IPs **Risk Scoring** Transaction Monitoring Security Question Supporting Documents

INTERNAL ID KJ2BW  
 MANUAL RISK SCORE 56  
 TOTAL RISK SCORE 56  
 RISK LEVEL Medium  
 COMPLIANCE ADVANTAGE 0  
 HTS  
 COMPLIANCE ADVANTAGE LINK  
 LINK  
 VERIFICATION Approved  
 APPLICATION STATUS  
 CATEGORY Approved By Compliance  
 NUMBER OF ATTEMPT TO 3  
 JUMIO Reset

Save & Return User

### KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
10	Place of birth	China	0
11	Citizenship on the document	China	31
12	Please tell us about your current employment status.	Retired	0
13	Please tell us about your occupation or business activity.	Other services-farming activity	5
14	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	0
15	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	0-10% (none or little of my turnover is in cash)	0
16	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10% (none or little of my turnover is in cryptocurrency)	0
17	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	Pension / Social Benefits, Savings	0
18	Please tell us about your sources of income/funds. Select more than one box if necessary.	Initialance, Property sale	0
19	Please tell us about your sources of wealth? Select more than one box if necessary.	Crypto Trading, Long term investment, Participate in Initial Exchange Offering, Crypto payment	5
20	Please select the services you plan to use. Select more than one box if necessary.	< 10,000	0
21	How much do you plan to deposit per year (USD and crypto combined)?	China	15
22	Please tell us which countries the funds will be received and/or transferred from.	Beginner	0
23	Let us know what your level of experience is with cryptocurrency trading? Please select one:	< 1 Year	0
24	How many years of experience do you have in crypto trading?	No	0
25	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	No	0

### Comment

Add a comment...

Add Comment

DATE & TIME

FILE NAME

ROLE

COMMENT

Based on the KYC responses, the Customer is Medium Risk considering the following risk factors:

- Client's Citizenship per China ID (A1)
- The occupation is Other services-farming activity (5)
- Customer chose Crypto Trading, Long term investment, Participate in Initial Exchange Offering, Crypto payment as the services she plan to use (5)
- Customer told us the funds will be received and/or transferred from China (15)
- So, the total risk rating score is 31+5+5+15=56.

Screening is performed against the Customer. There is 1 hit against the searched Chinese name and 0 against the English name. The potential hit are also hit as full name mismatch.

Overall, KYC Onboarding Analyst [REDACTED] is of the view that the initial AML CTR assessment result is consistent with the Customer's profile and does not oppose the decision to onboard the Customer with medium risk (risk score 56).

Notification email has been sent to the Customer due to her country of residency in China.

2/27/2021 10:11:14 AM



INTERNAL ID	6350ZQ
MANUAL SCORE	0 <input type="text"/> <input type="button" value="Set"/>
TOTAL RISK SCORE	46
RISK LEVEL	Medium
COMPY ADVANTAGE	
HITS	100
COMPY ADVANTAGE	
LINK	<a href="#">Compa&amp;bs;antage .ml</a>
VERIFICATION	Approved
APPLICATION STATUS	
CATEGORY	Approved By: Compliance
NUMBER OF ATTEMPT TO	7
JUNIO	<input type="button" value="Reset"/>
	<input type="button" value="Save &amp; inform User"/>

QUESTION SORT ORDER

QUESTION SORT ORDER	QUESTION	ANSWER
1	Place of birth	China
2	Citizenship on the document	China
3	Please tell us about your current employment status.	31
4	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	0
5	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	Unemployed
6	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	No
7	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	No
8	Please tell us about your sources of income (funds). Select more than one box if necessary.	0-10% (none or little of my turnover is in cash)
9	Please tell us about your sources of wealth? Select more than one box if necessary.	0-10% (none or little of my turnover is in cryptocurrency)
10	Please select the service(s) you plan to use. Select more than one box if necessary.	Salary / business income
11	How much do you plan to deposit per year (USD and crypto combined)?	Employment income
12	Please tell us which countries the funds will be received and / or transferred from.	Long term investment, Participate in Initial Exchange Offering
13	Let us know what your level of experience is with cryptocurrency trading. Please select one.	< 10,000
14	How many years of experience do you have in crypto trading?	United Arab Emirates
15	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	China
16		China
17		Beginner
18		< 1 Year
19		No
20		0

## Add to cart

Add Comment...			
DATE & TIME	FULL NAME	ROLE	COMMENT
5/20/2021 2:13:21 PM			<p>[Updated by KYC Onboarding Analyst, ██████████] She is a China national residing in UAE.(31)</p> <p>No email notification will be sent to the Customer due to her country of residency after approval.</p> <p>Based on the KYC response, the Customer is Medium risk considering the following risk factors:</p> <p>She is a China national residing in China.(31)</p> <p>Her origin of funds include UAE and China.(15)</p> <p>Screening is performed against the Customer's Chinese and English names.</p> <p>There are 500 hits against the specific names and the potential hits are discounted as age mismatch, no AML/CTF related and customer declared that she is not a member of the Local Council or Standing Committee of Daxing Municipal People's Congress of China.(16)</p> <p>Other hits are discounted due to name mismatch.</p> <p>Email notification will be sent to the Customer due to her country of residency after approval.</p> <p>Overall, KYC Onboarding Analyst, ██████████ is of the view that the initial AML/CTF assessment result is consistent with the Customer's profile and does not oppose the decision to onboard the Customer with Medium Risk.(6).</p>
5/20/2021 2:11:59 PM			

INTERNAL ID

EU729L

MANUAL RISK SCORE

0

Save

TOTAL RISK SCORE

56

RISK LEVEL

Medium

COMPLY ADVANTAGE

0

HITS

0

COMPLY ADVANTAGE LINK

Comply Advantage Link

VERIFICATION

Approved

APPLICATION STATUS

Approved

CATEGORY

Approved By: Compliance

NUMBER OF ATTEMPT TO

6

RESET

Reset

### KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
1	Place of birth	China	0
2	Citizenship on the document	China	31
3	Please tell us about your current employment status.	Employed	0
4	Please tell us about your occupation or business activity.	Technology and communications-information technology	5
5	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	0
6	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	No	0
7	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10% (none or little of my turnover is in cash)	0
8	Please tell us about your annual turnover, in individual or business activity, which is handled in crypto.	0-10% (none or little of my turnover is in cryptocurrency)	0
9	Please tell us about your source(s) of income funds. Select more than one box if necessary.	Salary / business income, investments, savings	0
10	Please tell us about your source(s) of wealth. Select more than one box if necessary.	Property sale, employment income, business profits	0
11	Please select the service(s) you plan to use. Select more than one box if necessary.	Crypto Trading, Long term investment, Participate in Initial Exchange Offering, Crypto payment	5
12	How much do you plan to deposit per year (USD and crypto combined)?	10 000 100 000	15
13	Please tell us which countries the funds will be received and/or transferred from.	China	0
14	Let us know what your level of experience is with cryptocurrency trading. Please select one:	Beginner	0
15	How many years of experience do you have in crypto trading?	1 - 3 years	0
16	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	No	0

### Comment

Add a comment...

Add Comment

DATE & TIME

FULL NAME

ROLE

COMMENT

2/2/2021 8:24:36 AM

Based on the KYC responses, the Customer is Medium Risk considering the following risk factors:

- Chinese Citizenship per China ID (31)
- The occupation is technology and communications-information technology (5)
- Customer chose Crypto Trading, Long term investment, Participate in Initial Exchange Offering, Crypto payment as the services he plan to use (5)
- Customer told us the funds will be received and/or transferred from China (15)

So, the total risk rating score is 31+5+5+15=56.

After checking, the name customer inputted in system is matched with his China ID. The original status "full name differ" can be discounted.

Screening is performed against the Customer. There is no hit against the searched Chinese name.

Overall, KYC Onboarding Analyst [REDACTED] is of the view that the initial AML, CTF assessment result is consistent with the Customer's profile and does not oppose the decision to onboard the Customer with Medium Risk [Risk score 56].

[illegible][illegible]

Comment	Rating	Rating Comment	Entry Code	File Name	Size	Category

[illegible][illegible]

INTERNAL ID  
MANUALRISKSCORE  
TOTAL RISK SCORE  
RISK LEVEL  
COMPLYADVANTAGE  
HITS  
COMPLYADVANTAGE LINK  
VERIFICATION  
APPLICATION STATUS  
CATEGORY  
NUMBER OF ATTEMPT TO  
JUMBO

C85085D  
0  
36  
Medium  
2  
[ComplyAdvantage Link](#)  
Approved  
Approved By Compliance  
1  
Reset

Save & Inform User

KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
1	Place of birth	China	0
2	Citizenship on the document	China	31
3	Please tell us about your current employment status.	Employed	0
4	Please tell us about your occupation or business activity.		0
5	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	0
6	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	No	0
7	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10% (none or little of my turnover is in cash)	0
8	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	0-10% (none or little of my turnover is in cryptocurrency)	0
9	Please tell us about your source(s) of income: funds. Select more than one box if necessary.	工资	0
10	Please select the service(s) you plan to use. Select more than one box if necessary.	Employment Income	0
11	How much do you plan to deposit per year (USD and crypto combined)?	Crypto Trading, Long term investment, Crypto payment	5
12	Please tell us which countries the funds will be received and/or transferred from.	< 10,000	0
13	Let us know what your level of experience is with cryptocurrency trading? Please select one:	Singapore	0
14	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	Beginner	0
15		< 1 Year	0

Comment

Add a comment...

Add Comment

DATE & TIME	FULL NAME	ROLE	COMMENT
-------------	-----------	------	---------

1/10/2021 10:39:28 AM

Based on the KYC responses, the Customer is Medium Risk considering the following risk factors:

1. Chinese citizenship per PIC Passport
2. Selected services include Crypto Trading & Crypto Payment

Screening is performed against the Customer. There are 2 hits against the searched English name. There are 4 hits against the searched Chinese name.

All hits are discounted as NAME MISMATCH, DOB MISMATCH, ADVERSE MEDIA UNRELATED TO ANL, CTF.

Overall, Senior KYC Onboarding Analyst: [REDACTED] is of the view that the initial ANL/CTF assessment result is consistent with the Customer's profile and does not oppose the decision to onboard the Customer with Medium Risk [36].



Profile Balances Ledger Deposits Deposit Addresses Withdrawals Redemption Limits Withdrawal Addresses Bank Accounts Active Orders Completed Orders Trades Tiers Mail Queue Notifications Activity Error Log Exploit Attempts Referrals Referral Bonuses

Whitelisted IP: Risk Scoring Transaction Monitoring Security Question Supporting Documents

INTERNAL ID	KGCHVN
MANUAL RISK SCORE	0
TOTAL RISK SCORE	45
RISK LEVEL	Medium
COMPLY ADVANTAGE	0
HTS	0
COMPLY ADVANTAGE LINK	<a href="#">Comply Advantage Link</a>
VERIFICATION APPLICATION STATUS	Auto-Approved
CATEGORY	Bank & Inform User
NUMBER OF ATTEMPT TO	1
RESET	Reset

### Risk Score Update History

DATE & TIME	FULL NAME	ROLE	RISK SCORE	RISK LEVEL
3/15/2023 3:05:41 PM	Auto (System)	Auto (System)	45	Medium

### KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
10	Place of birth	China	0
11	Citizenship on the document	China	25
12	Please tell us about your current employment status.	Employed	0
13	Please tell us about your occupation or business activity.	加密货币	0
14	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	0
15	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	No	0
16	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10K (none or little of my turnover is in cash)	0
17	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	0-10K (none or little of my turnover is in cryptocurrency)	0
18	Please tell us about your source(s) of income/funds. Select more than one box if necessary.	Salary / business income	0
19	Please tell us about your source(s) of wealth. Select more than one box if necessary.	Employment income	0
20	Please select the service(s) you plan to use. Select more than one box if necessary.	Crypto Trading, Long term investment, Crypto payment	5
21	How much do you plan to deposit per year (USD and crypto combined)?	10 000 100 000	0
22	Please tell us which countries the funds will be received and/or transferred from.	China	15
23	Let us know what your level of experience is with cryptocurrency trading? Please select one:	Beginner	0
24	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	< 1 Year	0
25		No	0

### Comment

350 8 COMMENTS...

Add Comment



INTERNAL ID  
MANUALRISKSCORE  
TOTAL RISK SCORE  
RISK LEVEL  
COMPLYADVANTAGE  
HITS  
COMPLYADVANTAGE LINK  
VERIFICATION  
APPLICATION STATUS  
CATEGORY  
NUMBER OF ATTEMPT TO  
JUMIO

CNF1PAS  
0  
5  
Low  
0  
Compliance Link  
Auto-Approved  
Save & Inform User  
2  
Reset

KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
10	Place of Birth	Hong Kong	0
11	Citizenship on the document	United Kingdom	0
12	Please tell us about your current employment status.	Employed	0
13	Please tell us about your occupation or business activity.	Trade - Trade in means of transport	5
14	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	0
15	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	No	0
16	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10k (none or little of my turnover is in cash)	0
17	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	0-10k (none or little of my turnover is in cryptocurrency)	0
18	Please tell us about your sources of income/funds. Select more than one box if necessary.	Salary / business income	0
19	Please tell us about your sources of wealth? Select more than one box if necessary.	Employment income	0
20	Please select the service(s) you plan to use. Select more than one box if necessary.	Long term investment	0
21	How much do you plan to deposit per year (USD and crypto combined)?	< 10 000	0
22	Please tell us which countries the funds will be received and/or transferred from.	United Kingdom	0
23	Let us know what your level of experience is with cryptocurrency trading? Please select one.	Beginner	0
24	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	< 1 Year	0
25		No	0

Comment

Add a comment...

Add Comment



INTERNAL ID:

MANUAL RISK SCORE:

TOTAL RISK SCORE: 13

RISK LEVEL: Low

COMPLIANCE ADVANTAGE: 0

HTS: 0

COMPLIANCE ADVANTAGE LINK: [\(Click to view advantage link\)](#)

VERIFICATION LINK: [\(Click to view verification link\)](#)

APPLICATION STATUS: Auto-Approved

CATEGORY:

NUMBER OF ATTEMPTS TO JOINT: 2

Reset

Send a follow up

Risk Score Update History

DATE & TIME	DATE & TIME	FULL NAME	NOTE	RISK SCORE	RISK LEVEL
7/14/2023 10:19:12 AM		Auto (System)		13	Low

KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
10	Place of birth	China	0
11	Citizenship on the document	China	0
12	Please tell us about your current employment status.	Employed	0
13	Please tell us about your occupation or business activity.	Self-employed	0
14	Please tell us about business you may conduct in other country(ies) besides where you are registered for tax purposes?	No	0
15	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	No	0
16	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10% (none or little of my turnover is in cash)	0
17	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	0-10% (none or little of my turnover is in cryptocurrency)	0
18	Please tell us about your source(s) of income funds. Select more than one box if necessary.	Salary / business income	0
19	Please tell us about your source(s) of wealth. Select more than one box if necessary.	Employment income	0
20	Please select this service(s) you plan to use. Select more than one box if necessary.	Crypto Trading, Long term investment, Participate in Initial Exchange Offering, Crypto payment	6
21	How much do you plan to deposit per year (USD and crypto combined)?	10 000 100 000	0
22	Please tell us which countries the funds will be received and/or transferred from.	China	0
23	Let us know what your level of experience is with cryptocurrency trading? Please select one.	Beginner	0
24	How many years of experience do you have in crypto trading?	< 1 Year	0
25	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	No	0

Comment

Add a comment...

Add Comment

TRANSACTION MONITORING: KYC Questionnaire

MANUAL REVIEW: 12/20/23

TOTAL RISK SCORE: 70

RISK LEVEL: Medium

COMPLIANCE ADVANTAGE: 0

HTS: 0

COUNTRY ADVANTAGE: 0

VERIFICATION: Approved

APPLICATION STATUS: Approved

CATEGORY: Approved

NUMBER OF ATTEMPTS TO JUMBO: 5

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
11	Please tell us about your current employment status.	China	0
12	Please tell us about your current employment status.	China	0
13	Please tell us about your occupation or business activity.	Employed	0
14	Please tell us about your occupation or business activity.	Employed	0
15	Please tell us about your occupation or business activity.	Employed	0
16	Please tell us about your occupation or business activity.	Employed	0
17	Please tell us about your occupation or business activity.	Employed	0
18	Please tell us about your occupation or business activity.	Employed	0
19	Please tell us about your occupation or business activity.	Employed	0
20	Please tell us about your occupation or business activity.	Employed	0
21	Please tell us about your occupation or business activity.	Employed	0
22	Please tell us about your occupation or business activity.	Employed	0
23	Please tell us about your occupation or business activity.	Employed	0
24	Please tell us about your occupation or business activity.	Employed	0
25	Please tell us about your occupation or business activity.	Employed	0

Comment

DATE TYPE	FULL NAME	RISK
-----------	-----------	------

10/12/2023 4:45:31 PM

8/1/2023 3:15:32 PM

5/25/2023 4:46:07 PM

5/25/2023 2:32:46 PM

5/24/2023 2:31:31 PM

5/24/2023 9:35:32 AM

NFC Onboarding Analysis: [REDACTED] agrees with analyst's assessment.

The risk factors are below:

- Client's citizenship is China and residing in Cambodia (50)
- The services he planned to use are Crypto Trading, Long term investment and Crypto payment (5)
- Country he lived and he resided and/or resided from Cambodia (10)

The risk level remains the same as High (70).

This and the review was triggered by periodic review.

As per client's signed NFC Onboarding form, customer declared that his existing profile has no changes.

When screening is performed against customer and there is no hit against the searched names.

Customer accumulated deposit is below USD 100K as of today which matched with the expected annual deposit amount, no suspicious was noted at this stage.

Since the risk score calculation method is enhanced, we re-evaluated client's risk score. Based on existing information, Compliance officer [REDACTED] is of the view that the risk score calculation is consistent with the Customer's profile and the risk level will be changed from High (70) to Ultra-high (98). Score added (70-21-25-28) due to client's current residency. This should be excluded for a next review.

[REDACTED] has no further comments to Compliance Analyst's assessment and does not oppose the decision to onboard the Customer with high risk.

Based on the NFC responses, the Customer is high risk considering the following risk factors

- He is a China national residing in Cambodia (50)
- He planned to use include crypto trading, long term investment and crypto payment (5)
- His origin of funds include Cambodia (5)

Screening is performed against the Customer's Chinese and English name. There is no hit against the searched names.

It is recommended to obtain more information regarding the source of income wealth after deposits more than 100K in a calendar month and crypto payments.

Overall, NFC Onboarding Analysis: [REDACTED] is of the view that the initial risk score assessment result is consistent with the Customer's profile and does not oppose the decision to onboard the Customer with high risk (70). The case is escalated for senior manager's approval.

Updated by NFC Onboarding Analyst: [REDACTED] The final risk score is updated as 70 (High risk) from 51 (Low risk) as customer resides in Cambodia which is a high risk country. The 25 score of High risk country is added and deducted 1 score from China. Total: 21+25+28=70.

Reviewed by NFC Onboarding Analyst: [REDACTED] (signature) was sent to Customer via email and in rejection of this name (signature).

[illegible][illegible][illegible]



QUESTIONS	ANSWERS	MARKS	ANSWERS	MARKS	QUESTIONS	ANSWERS	MARKS
1. What is the main purpose of the study?	To investigate the effect of the intervention on the outcome.	1	1. What is the main purpose of the study?	1	1. What is the main purpose of the study?	1	
2. What is the research design?	Randomized controlled trial.	1	2. What is the research design?	1	2. What is the research design?	1	
3. What is the intervention?	The intervention is the new treatment.	1	3. What is the intervention?	1	3. What is the intervention?	1	
4. What is the control?	The control is the standard treatment.	1	4. What is the control?	1	4. What is the control?	1	
5. What is the primary outcome?	The primary outcome is the time to relapse.	1	5. What is the primary outcome?	1	5. What is the primary outcome?	1	
6. What is the secondary outcome?	The secondary outcome is the quality of life.	1	6. What is the secondary outcome?	1	6. What is the secondary outcome?	1	
7. What is the sample size?	The sample size is 100.	1	7. What is the sample size?	1	7. What is the sample size?	1	
8. What is the significance level?	The significance level is 0.05.	1	8. What is the significance level?	1	8. What is the significance level?	1	
9. What is the p-value?	The p-value is 0.02.	1	9. What is the p-value?	1	9. What is the p-value?	1	
10. What is the conclusion?	The conclusion is that the intervention is effective.	1	10. What is the conclusion?	1	10. What is the conclusion?	1	
11. What is the limitation?	The limitation is the small sample size.	1	11. What is the limitation?	1	11. What is the limitation?	1	
12. What is the strength?	The strength is the randomization.	1	12. What is the strength?	1	12. What is the strength?	1	
13. What is the recommendation?	The recommendation is to use the intervention.	1	13. What is the recommendation?	1	13. What is the recommendation?	1	
14. What is the future research?	The future research is to investigate the mechanism.	1	14. What is the future research?	1	14. What is the future research?	1	
15. What is the ethical approval?	The ethical approval is granted.	1	15. What is the ethical approval?	1	15. What is the ethical approval?	1	
16. What is the funding source?	The funding source is the government.	1	16. What is the funding source?	1	16. What is the funding source?	1	
17. What is the conflict of interest?	There is no conflict of interest.	1	17. What is the conflict of interest?	1	17. What is the conflict of interest?	1	
18. What is the registration number?	The registration number is 123456.	1	18. What is the registration number?	1	18. What is the registration number?	1	
19. What is the date of publication?	The date of publication is 2023.	1	19. What is the date of publication?	1	19. What is the date of publication?	1	
20. What is the journal name?	The journal name is the Journal of Medicine.	1	20. What is the journal name?	1	20. What is the journal name?	1	

[illegible]

INTERNAL ID  
MANUALRISKSCORE  
TOTAL RISK SCORE  
RISK LEVEL  
COMPL ADVANTAGE  
HITS  
COMPL ADVANTAGE LINK  
VERIFICATION  
APPLICATION STATUS  
CATEGORY  
NUMBER OF ATTEMPT TO JUMP

0  
56  
Medium  
100  
[Compliance Link](#)  
Approved  
Approved by Compliance  
3  
Reset

See A. Inform User

KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK FACTOR
1	Place of birth	China	0
2	Citizenship on the document	China	31
3	Please tell us about your current employment status.	Employed	0
4	Please tell us about your occupation or business activity.	Technology and communications information technology	3
5	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	0
6	Please tell us about individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	0-10k (none or little of my turnover is in cash)	0
7	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10k (none or little of my turnover is in cryptocurrency)	0
8	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	Salary / business income, investments, savings	0
9	Please tell us about your source(s) of income funds. Select more than one box if necessary.	Property sale, employment income	0
10	Please select the service(s) you plan to use. Select more than one box if necessary.	Crypto trading, long term investment, participate in initial exchange offering, crypto payment	5
11	How much do you plan to deposit per year (USD and crypto combined)?	10 000 100 000	0
12	Please tell us which countries the funds will be received and or transferred from.	Australia Singapore United States	15
13	Let us know what your level of experience is with cryptocurrency trading? Please select one	Beginner	0
14	How many years of experience do you have in crypto trading?	< 1 Year	0
15	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	No	0

Comment

Add a comment...

DATE & TIME	RISK NAME	RISK	COMMENT
-------------	-----------	------	---------

Screening QA is performed against the Customer. There are 100 hits against the searched English name. There are 100 hits against the searched Chinese name. All hits are disclosed as NAME MISMATCH, DOB MISMATCH, OCCUPATIONAL BACKGROUND MISMATCH, PHOTO MISMATCH, COUNTRY OF RESIDENCE MISMATCH, ADVERSE MEDIA UNRELATED TO AML, CTF, or CORPORATES.

Senior KYC Onboarding Analyst [REDACTED] emailed the Customer clarification regarding US funds via Zensend #53673 on 18 May.

The Customer cited traveling & investment as primary justifications for transaction with US account.

Senior KYC Onboarding Analyst [REDACTED] emailed the Customer notification regarding Chinese Residence via Zensend #54066 on 18 May.

Based on the KYC responses, the Customer is Medium Risk considering the following risk factors:

1. Chinese citizenship per PRC Passport
2. Occupation of information technology
3. Selected services include Crypto Trading, Participate in Initial Exchange Offering, Crypto Payment
4. Funds received and or transferred from Australia, Singapore, US

Screening is performed against the Customer. There are 100 hits against the searched English name. There are 100 hits against the searched Chinese name.

All hits are disclosed as NAME MISMATCH, DOB MISMATCH, OCCUPATIONAL BACKGROUND MISMATCH, ADVERSE MEDIA UNRELATED TO AML, CTF, or CORPORATES.

Overall, Senior KYC Onboarding Analyst [REDACTED] is of the view that the initial AML, CTF assessment result is consistent with the Customer's profile and does not oppose the decision to onboard the Customer with Medium Risk PS.

INTERNAL ID

MANUALRISKSCORE

TOTAL RISK SCORE

RISK LEVEL

COMPLYADVANTAGE

HTS

COMPLYADVANTAGE LINK

VERIFICATION

APPLICATION STATUS

CATEGORY

NUMBER OF ATTEMPT TO

RESET

Save & Return Later

Risk Score Update History

DATE & TIME	FULL NAME	ROLE	RISK SCORE	RISK LEVEL
1/10/2021 12:57:18 PM		Auto (System)	30	Low

KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK FACTOR
0	Place of birth	China	0
1	Citizenship on the document	Singapore	25
2	Please tell us about your current employment status.	Employed	0
3	Please tell us about your occupation or business activity.	Water supply	0
4	Please tell us about business you may conduct in other country(ies) besides where you are registered for tax purposes?	No	0
5	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	No	0
6	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	90-100k (all or almost all of my turnover is in cash)	0
7	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	0-100k (none or little of my turnover is in cryptocurrency)	0
8	Please tell us about your sources of income. Funds. Select more than one box if necessary.	Salary / Business income	0
9	Please select the service(s) you plan to use. Select more than one box if necessary.	Employment income	0
10	How much do you plan to deposit per year (USD and crypto combined)?	Crypto Trading, Long term investment, Crypto payment	5
11	Please tell us which countries the funds will be received and/or transferred from.	10 000 100 000	0
12	Let us know what your level of experience is with cryptocurrency trading? Please select one:	Singapore	0
13	How many years of experience do you have in crypto trading?	Beginner	0
14	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	< 1 Year	0
15		No	0

Comment

Add a comment...

Add Comment

Profile Balances Ledger Deposits Deposit Addresses Withdrawals Redemption Limits Withdrawal Addresses Bank Accounts Active Orders Completed Orders Trades Tiers Mail Queue Notifications Activity Error Log Export Attempts Referrals Referral Bonuses Whitelisted IP's **Risk Scoring**

INTERNAL ID WCAUHQD  
MANUAL RISK SCORE 51  
TOTAL RISK SCORE 51  
RISK LEVEL Medium  
COMPLY/ADVANTAGE 0  
HTS  
COMPLY/ADVANTAGE LINK  
LINK  
VERIFICATION Approved  
APPLICATION STATUS Approved  
CATEGORY Approved By: Compliance  
NUMBER OF ATTEMPT TO 1  
JUMBO Revert

Save & Return Later

### KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
10	Place of birth	China	0
11	Citizenship on the document	China	31
12	Please tell us about your current employment status.	Unemployed	0
14	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	0
15	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	No	0
16	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10k (none or little of my turnover is in cash)	0
17	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	0-10k (none or little of my turnover is in cryptocurrency)	0
18	Please tell us about your source(s) of income (funds). Select more than one box if necessary.	Investments	0
19	Please tell us about your source(s) of wealth. Select more than one box if necessary.	Property sale	0
20	Please select the service(s) you plan to use. Select more than one box if necessary.	Crypto Trading, Long term investment, Participate in initial exchange offering, Crypto payment	5
21	How much do you plan to deposit per year (USD and crypto combined)?	< 10 000	0
22	Please tell us which countries the funds will be received and/or transferred from.	Russia	15
23	Let us know what your level of experience is with cryptocurrency trading? Please select one:	Beginner	0
24	How many years of experience do you have in crypto trading?	< 1 Year	0
25	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	No	0

### Comment

ADD A COMMENT...

DATE & TIME	FULL NAME	RISK	COMMENT
6/23/2021 10:50:39 AM			There is 3 hit against the searched born for English and Chinese name. All discount as crime mismatch based on the KYC responses, the Customer is Medium Risk considering the following risk factors:

5/20/2021 4:23:18 PM

1. Chinese citizenship per RUC passport [31]  
2. Selected services include Crypto Trading, Long Term Investment, Participate in initial Exchange Offering, Crypto payment [5]  
3. Funds received and/or transferred from Russia [15]  
Screening is performed against the Customer.  
There is 0 hit against the searched born for English and Chinese name.  
Overall, KYC Onboarding Analyst [REDACTED] is of the view that the initial AML CTF assessment result is consistent with the Customer's profile and does not oppose the decision to onboard the Customer with Medium Risk [51].

7/1/2022 10:47:15 AM

INTERNAL ID	FILECAT #	Issue
MANUALDISCSCORE	90	
TOTAL RISK SCORE	90	
RISK LEVEL	Low-Medium	
COMPLIANCE ADVANTAGE	0	
MTS		
COMPLIANCE ADVANTAGE LINK	<a href="#">Compliance Advantage Link</a>	
VERIFICATION	Approved	
APPLICATION STATUS		
CATEGORY	Approved By Compliance	
NUMBERS OF ATTEND TO	Reset	
JUNIO		

Place of birth
0

4	Please tell us about your current employment status.	Unemployed	0
5	Please tell us about business you have conducted in either country(s) besides where you are registered for tax purposes?	No	0
6	Is your individual activity or business registered or conducted in preferred tax zone for instance, free economic zone, offshore jurisdiction?	No	0
7	Please tell us about your annual turnover, is individual or business activity, which is handled in cash.	0-100 euros or less of my turnover is in cash	0
8	Please tell us about your sources of income funds, which is handled in cryptocurrencies.	0-100 euros or less of my turnover is in cryptocurrencies	0
9	Please tell us about your sources of income funds, select more than one box if necessary.	Salary, Business income, Dividend, Loan, Credit	0
10	Please tell us about your sources of wealth/Select more than one box if necessary.	Property sale, Employment income, Business profits	0
11	Please select the services you plan to use, select more than one box if necessary.	Crypto Trading, Long term investment, Arbitrage Trading, Crypto payment	0
12	How much do you plan to deposit per year (USD and crypto combined)?	0 to 1000 to 100 000	0
13	Please tell us which countries the funds will be received and or transferred from.	Australia	20
14	Let us know what your level of experience is with cryptocurrencies trading? Please select one	China	0
15	How many years of experience do you have in crypto trading?	More than 5 years	0
16	day yes, an immediate family member or a close associate, extended, or have been employed, with prominent public functions in any country or international institution This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	Extensive	0
17		< 1 Year	0
18		No	0

1997-1998

Add Comment			
DATE & TIME	URL NAME	URL	COMMENT
This table contains web resources for general review.			

This ad hoc review was triggered by periodic reviews.

As per client's signed KDC Questionnaire form, customer declared that client's existing profile has no changes.

Name steering is performed against customer and there is no hit against the searched names.

Customer accumulated deposits a below USD 100K as of today, which matched with the expected annual deposit amount; no suspicious was noted at this stage.

*Scores will be changed from 96 to 93.*

*Notification email has been sent to the Customer due to his country of residency in China.*

due to previous guidelines from committees regarding similar profiles and will onboard customer with or more additional evidence should be requested on Scf and Scfh.

1. Citizenship on the document is China [31]

3. Selected services include Crypto Trading, Long term investment, Always Trading, Crypto payment [5].

4. Funds will be received and/or transferred from Australia, China, Philippines & Hong Kong [20]

According to the AIC Questionnaire, the Customer will deposit funds from Australia, China, Philippines & Hong Kong, he has declared deposit volume is below USD 100K per annum, it is recommended to substantiate his source of wealth if the deposits more than USD 100K in future.

Screening is performed against the Customer. There is no hit against the searched names.

years old, the accumulated income from his previous employment and the revenue from his property sale can match with the declared deposit volume. The assessed source of wealth is commensurate with the Customer's profile.

Overall, KYC Onboarding Analyst [REDACTED] is of the view that the initial AML/CFT assessment result is consistent with the Customer's profile as USA-  
High risk (FIRIX SCORE: 9). This should be escalated to New Business Committee for approval.



INTERNAL ID PHUB20

MANUAL RISK SCORE 0 [See](#)

TOTAL RISK SCORE 15

RISK LEVEL Low

COMPLY ADVANTAGE 0

HTS

COMPLY ADVANTAGE LINK [Comply Advantage Link](#)

VERIFICATION

APPLICATION STATUS Auto-Approved [See & Inform User](#)

CATEGORY

NUMBER OF ATTEMPT TO 2 [Reset](#)

JUMBO

KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
10	Place of birth	China	0
11	Citizenship on the document	Australia	0
12	Please tell us about your current employment status.	Owner of legal entity	5
13	Please tell us about your occupation or business activity.	Technology and communications-information technology	5
14	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	0
15	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	No	0
16	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10k income or little of my turnover is in cash	0
17	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	0-10k income or little of my turnover is in cryptocurrency	0
18	Please tell us about your source(s) of income/funds. Select more than one box if necessary.	Salary / business income	0
19	Please tell us about your source(s) of wealth. Select more than one box if necessary.	Employment income, business profits	0
20	Please select the service(s) you plan to use. Select more than one box if necessary.	Crypto Trading, Participate in Initial Exchange Offering, Crypto payment	5
21	How much do you plan to deposit per year (USD and crypto combined)?	10 000 100 000	0
22	Please tell us which countries the funds will be received and / or transferred from.	Australia	0
23	Let us know what your level of experience is with cryptocurrency trading? Please select one	Beginner	0
24	How many years of experience do you have in crypto trading?	< 1 Year	0
25	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	No	0

Comment

Add a comment...

Add Comment

QUESTION SORT ORDER

QUESTION SORT ORDER

QUESTION SORT ORDER

Add a comment...

Profile Balances Ledger Deposits Deposit Addresses Withdrawals Redemption Limits Withdrawal Addresses Bank Accounts Active Orders Completed Orders Trades Tiers Mail Queue Notifications Activity Error Log Export Attempts Referrals Referral Bonuses Whitelisted IPs **Risk Scoring**

Transaction Monitoring Security Question Supporting Documents

INTERNAL ID KYORCL  
MANUAL RISK SCORE 41  
TOTAL RISK SCORE 41  
RISK LEVEL Medium  
COMPLY ADVANTAGE 0  
HITS 0  
COMPLY ADVANTAGE LINK [Comply Advantage Link](#)

VERIFICATION Approved  
APPLICATION STATUS Approved By Compliance  
CATEGORY Approved By Compliance  
NUMBER OF ATTEMPT TO 7 Reset

STATUS: [View & Inform User](#)

### KYC Questionnaire

QUESTION ID	QUESTION	ANSWER	RISK RATING
10	Place of Birth	China	0
11	Citizenship on the document	China	31
12	Please tell us about your current employment status.	Self-employed	5
13	Please tell us about your occupation or business activity.	Services- Tourism and travel agencies activities	5
14	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	0
15	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	No	0
16	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10k (none or little of my turnover is in cash)	0
17	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	0-10k (none or little of my turnover is in cryptocurrency)	0
18	Please tell us about your source(s) of income / funds. Select more than one box if necessary.	Salary / business income	0
19	Please select the service(s) you plan to use. Select more than one box if necessary.	Business profits	0
20	How much do you plan to deposit per year (USD and crypto combined)?	Long term investment	0
21	Please tell us about your source(s) of income / funds. Select more than one box if necessary.	10 000-100 000	0
22	Please tell us about your source(s) of income / funds. Select more than one box if necessary.	Australia	0
23	Let us know what your level of experience is with cryptocurrency trading? Please select one	Beginner	0
24	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role of a senior military position, at home or overseas.	< 1 Year	0
25		No	0

### Comment

Add a comment...

Add Comment

DATE & TIME FULL NAME RISK

COMMENT

Based on the KYC responses, the Customer is Medium Risk considering the following risk factors:

1. Chinese Citizenship as per inputted by the customer [31]
2. Self-employed status [5]
3. Business activity is Services-Tourism and travel agencies activities [5]

Screening is performed against the Customer. There are 3 hits against the searched names. All hits can be discounted due to the Name Mismatch.

Overall, KYC Onboarding Analyst [REDACTED] is of the view that the initial AML CTR assessment result is consistent with the Customer's profile and does not oppose the decision to onboard the Customer with Medium Risk (Risk Score: 41).

Profile Balances Ledger Deposits Deposit Addresses Withdrawals Redemption Limits Withdrawal Addresses Bank Accounts Active Orders Completed Orders Trades Tiers Mail Queue Notifications Activity Error Log Exploit Attempts Referrals Referral Bonuses Whitelisted IPs **Risk Scoring**

Transaction Monitoring Security Question Supporting Documents

INTERNAL ID	72417NF8
MANUAL SCORE	51
TOTAL RISK SCORE	51
RISK LEVEL	Medium
COMPLY ADVANTAGE	100
HITS	
COMPLY ADVANTAGE LINK	<a href="#">ComplyAdvantage Link</a>
VERIFICATION	Approved
APPLICATION STATUS	Approved
CATEGORY	Approved By Compliance
NUMBER OF ATTEMPT TO	3
JUDG	Repeat

### KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK RATING
10	Place of Birth	China	0
11	Citizenship on the document	China	31
12	Please tell us about your current employment status.	Employed	0
13	Please tell us about your occupation or business activity.	Editor	0
14	Please tell us about businesses you may conduct in other country(s) besides where you are registered for tax purposes?	No	0
15	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	No	0
16	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10k (income or little of my turnover is in cash)	0
17	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	0-10k (income or little of my turnover is in cryptocurrency)	0
18	Please tell us about your sources of income funds. Select more than one box if necessary.	Salary / business income, investments, savings	0
19	Please tell us about your sources of wealth? Select more than one box if necessary.	Property sale, Employment income, Business profits	0
20	Please select the service(s) you plan to use. Select more than one box if necessary.	Crypto Trading, Long term investment, Arbitrage Trading, Participate in Initial Exchange Offering, Crypto payment	5
21	How much do you plan to deposit per year (USD and crypto combined)?	10 000 100 000	0
22	Please tell us which countries the funds will be received and / or transferred from.	China	15
23	Let us know what your level of experience is with cryptocurrency trading? Please select one:	Beginner	0
24	How many years of experience do you have in crypto trading?	< 1 Year	0
25	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	No	0

### Comment

Add a comment...

ADD COMMENT	DATE & TIME	FULL NAME	NOTE	COMMENT
-------------	-------------	-----------	------	---------

5/11/2021 10:12:55 AM

Based on this KYC response, the Customer is Medium Risk considering the following risk factors:

(3) Citizenship: China

(17) funds will be received and / or transferred from: China

(21) services you plan to use - Crypto Trading, Long term investment, Arbitrage Trading, Participate in Initial Exchange Offering, Crypto payment

Screening is performed against the Customer. There are 100 hits against the searched names. 98 hits are discounted due to name mismatch. 2 hits are discounted because there were no related result by using name and ID to search in the database provided in the link.

Notification email has been sent to the Customer due to his country of residency in China.

Overall, KYC Onboarding Analyst: [REDACTED] is of the view that the initial AML, CTF assessment result is consistent with the Customer's profile and does not oppose the decision to onboard the Customer with Medium Risk 51.

Profile Balances Ledger Deposits Deposit Addresses Withdrawals Redemption Limits Withdrawal Addresses Bank Accounts Active Orders Completed Orders Trades Test Mail Queue Notifications Activity Error Log Export Attempts Referrals Referral Bonuses Whitelisted IPs **Risk Scoring**

INTERNAL ID	SCORE
MANUALRISKSCORE	0
TOTAL RISK SCORE	25
RISK LEVEL	Low
COMPLIANCE ADVANTAGE	0
HITS	
COMPLIANCE ADVANTAGE LINK	<a href="#">Compliance Advantage Link</a>
VERIFICATION	Auto-approved
APPLICATION STATUS	
CATEGORY	
NUMBER OF ATTEMPT TO	4
STATUS	Reset

### Risk Score Update History

DATE & TIME	FULL NAME	ROLE	RISK SCORE	RISK LEVEL
1/26/2022 1:30:17 PM	Auto (System)	Auto (System)	25	Low
1/26/2022 1:29:57 PM	Auto (System)	Auto (System)	25	Low
1/26/2022 1:29:11 PM	Auto (System)	Auto (System)	25	Low
1/26/2022 1:28:25 PM	Auto (System)	Auto (System)	25	Low

### KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK SCORE	RISK LEVEL
10	Place of birth	China	0	
11	Citizenship on the document	China	25	
12	Please tell us about your current employment status.	Employed	0	
13	Please tell us about your occupation or business activity.		0	
14	Please tell us about your business you may conduct in other country(ies) besides where you are registered for tax purposes?	No	0	
15	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	No	0	
16	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	90-100k (all or almost all of my turnover is in cash)	0	
17	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	0-10k (none or little of my turnover is in cryptocurrency)	0	
18	Please tell us about your source(s) of income/funds. Select more than one box if necessary.	TRADE	0	
19	Please tell us about your source(s) of wealth. Select more than one box if necessary.	Employment income	0	
20	Please select the service(s) you plan to use. Select more than one box if necessary.	Crypto Trading, Long term investment	0	
21	How much do you plan to deposit per year (USD and crypto combined)?	< 10,000	0	
22	Please tell us which countries the funds will be received and/or transferred from.	Korea (South)	0	
23	Let us know what your level of experience is with cryptocurrency trading? Please select one.	Beginner	0	
24	How many years of experience do you have in crypto trading?	< 1 Year	0	
25	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government job, a regulatory role or a senior military position, at home or overseas.	No	0	

### Comment

Add a comment...

Add Comment

DATE & TIME	FULL NAME	ROLE	COMMENT
1/26/2023 10:20:28 AM			Full name mismatch with ID, Customer input: [REDACTED]



INTERNAL ID  
MANUALRISKSCORE  
TOTAL RISK SCORE  
RISK LEVEL  
COMPLYADVANTAGE  
HTS

MC08631  
6  
Low  
0  
HTS

LINK  
VERIFICATION  
APPLICATION STATUS  
CATEGORY  
NUMBER OF ATTEMPT TO

[Crypto Advantage Link](#)  
Auto-Approved  
Auto-Approved  
JIMMO  
2

DATE & TIME

3/1/2023 4:40:08 PM  
3/1/2023 4:38:28 PM  
3/1/2023 4:37:45 PM

Full Name

Auto (System)  
Auto (System)  
Auto (System)

ROLE

Auto (System)  
Auto (System)  
Auto (System)

RISK SCORE

6  
0  
0

RISK LEVEL

Low  
Low  
Low

Risk Score Update History

KYC Questionnaire

QUESTION SCORE ORDER	QUESTION	ANSWER	RISK SCORE	RISK LEVEL	RISK RATING
12	Please tell us about your current employment status.	Self-employed			0
13	Please tell us about your occupation or business activity.				0
18	Please tell us about your sources of income. funds. Select more than one box if necessary.	Salary, business income			0
19	Please tell us about your sources of wealth. Select more than one box if necessary.	Employment income			0
20	Please select the service(s) you plan to use. Select more than one box if necessary.	Crypto Trading, Long term investment, Participate in Initial Exchange Offering, Crypto Payment			6
21	How much do you plan to deposit per year (USD and crypto combined)?	< 10,000			0
22	Please tell us which countries the funds will be received and/or transferred from.	Hong Kong			0
25	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	No			0

Comment

Add a comment...

Add Comment

INTERNAL ID  
MANUAL SCORE  
TOTAL RISK SCORE  
RISK LEVEL  
COMPLIANCE ADVANTAGE  
LINK  
VERIFICATION  
APPLICATION STATUS  
CATEGORY  
NUMBER OF ATTEMPT TO

CODE22P  
0  
3  
Low  
60  
[Compliance Advantage Link](#)  
Approved  
Approved By Compliance  
1  
Report

▼ Save & Return Later

QUESTION (DON'T ORDER)		QUESTION	ANSWER	RISK RATING
10	Place of Birth		China	0
11	Citizenship on the document		Australia	0
12	Please tell us about your current employment status.		Employed	0
13	Please tell us about your occupation or business activity.		Health and wellness-Health care	5
14	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?		No	0
15	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?		No	0
16	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.		0-10k (none or little of my turnover is in cash)	0
17	Please tell us about your source(s) of income/ funds, select more than one box if necessary.		0-10k (none or little of my turnover is in cryptocurrency)	0
18	Please tell us about your source(s) of income/ funds, select more than one box if necessary.		Salary / business income	0
19	Please select the service(s) you plan to use. Select more than one box if necessary.		Employment income	0
20	How much do you plan to deposit per year (USD and crypto combined)?		Long term investment	0
21	Please tell us which countries the funds will be received and/or transferred from.		< 10 000	0
22	Let us know what your level of experience is with cryptocurrency trading? Please select one.		Australia	0
23	How many years of experience do you have in crypto trading?		Beginner	0
24	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.		< 1 Year	0
25			No	0

Comment

Add a comment...

Add Comment

DATE & TIME

FULL NAME

ROLE

COMMENT

5/12/2021 9:33 31 AM

Based on the KYC response, the Customer is considered Low Risk. Screening is performed against the Customer with 53 hits. 02 are discounted due to name mismatch. 1 hit is discounted by using name and ID number to search in the link provided, no relevant result is shown.  
Overall, KYC Onboarding Analysis is of the view that the initial AML, CTF assessment result is consistent with the Customer's profile and does not oppose the decision to onboard the Customer with Low Risk 5.

INTERNAL ID	SOCITE
MANUAL BSR CODE	0
TOTAL BSR SCORE	55
BSR LEVEL	Medium
CORRECTION/ADVANCE	99
LINE	<a href="#">Complete strategy link</a>
VERIFICATION	Approved
APPLICATION STATUS	Approved for Completion
CATEGORY	
NUMBERS OF ATTEMPT TO	5
JUMBO	Revised

### Risk Score Update History

DATE	TIME	TEST NAME	ECG	HR SCORE	PRC LEVEL
12. 6. 2021	4:10:44 PM	Auto System)	Auto System)	55	Medium
12. 6. 2021	4:10:10 PM	Auto System)	Auto System)	55	Medium
12. 6. 2021	4:10:59 PM	Auto System)	Auto System)	55	Medium
12. 6. 2021	4:10:42 PM	Auto System)	Auto System)	55	Medium
12. 6. 2021	4:18:57 PM	Auto System)	Auto System)	-40	Medium
12. 6. 2021	4:18:04 PM	Auto System)	Auto System)	-40	Medium
12. 6. 2021	4:17:32 PM	Auto System)	Auto System)	35	Medium
12. 6. 2021	4:16:38 PM	Auto System)	Auto System)	35	Medium
12. 6. 2021	4:16:11 PM	Auto System)	Auto System)	35	Medium
12. 6. 2021	4:15:30 PM	Auto System)	Auto System)	35	Medium
12. 6. 2021	4:15:21 PM	Auto System)	Auto System)	35	Medium
12. 6. 2021	4:15:03 PM	Auto System)	Auto System)	35	Medium
12. 6. 2021	4:13:55 PM	Auto System)	Auto System)	30	Low
12. 6. 2021	4:13:23 PM	Auto System)	Auto System)	25	Low
12. 6. 2021	4:13:07 PM	Auto System)	Auto System)	0	Low

## KYC Questionnaire

QUESTION NUMBER	QUESTION SHORT CODES	COUNTRY	ANSWER	DISC. RATE
10	Place of birth	China	0	
11	Citizenship of the document	China	25	
12	Please tell us about your current employment status.	Self-employed	5	
13	Please tell us about your occupation or business activity.	Services/Tourism and travel agencies activities	5	
14	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	0	
15	Is your individual activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	No	0	
16	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10K (none or little of my turnover is in cash)	0	
17	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	0-10K (none or little of my turnover is in cryptocurrency)	0	
18	Please tell us about your source(s) of income funds, select more than one box if necessary.	Salary/ Business Income	0	
19	Please select the source(s) of income funds, select more than one box if necessary.	Employment income, Business profits	0	
20	Please select the service(s) you plan to use, select more than one box if necessary.	Crypto trading, Long term investment, Arbitrage Trading, Crypto payment	5	
21	How much do you plan to deposit per year USD and crypto combined?	10 000 100 000	0	
22	Please tell us which countries the funds will be received and/or transferred from.	China	15	
23	Let us know what your level of experience is with cryptocurrency trading? Please select one	Beginner	0	
24	How many years of experience do you have in crypto trading?	< 1 Year	0	
25	Are you an immediate family member or a close associate, affiliated, or have been affiliated, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	No	0	

### Comment

### Also in Current Issues

ADD COMMENT	DATE & TIME	FILE NAME	ROLE	COMMENT
	12/17/2021 8:10:15 PM			<p>a. Full Name matches with Jumbo record</p> <p>b. DOB matches with Jumbo record</p> <p>c. Full address provided</p> <p>d. Origin of funds from US/Canada/Japan - N/A</p> <p>e. No adverse findings from screening</p> <p>f. Discouraging of Screening Rtc - zero English and Chinese name search hit.</p> <p>Based upon Business Committee's guidance on Oct 1, 2021, it is agreed to onboard the Customer with China residency with medium risk (\$35).</p>

INTERNAL ID  
MANUALRISKSCORE  
TOTAL RISK SCORE  
RISK LEVEL  
COMPLYADVANTAGE  
HITS  
COMPLYADVANTAGE LINK  
VERIFICATION  
APPLICATION STATUS  
CATEGORY  
NUMBER OF ATTEMPT TO JUMBO

LO7DOLW  
5  
Low  
1  
ComplyAdvantage Link  
Approved  
Approved By Compliance  
3 x 6 Month View  
1  
Reset

Risk Score Update History

DATE & TIME	FULL NAME	RISK	RISK SCORE	RISK LEVEL
3/13/2022 12:29:17 PM	Auto (System)	Auto (System)	5	Low

KYC Questionnaire

QUESTION SORT ORDER	QUESTION	ANSWER	RISK MATCH
10	Place of Birth	China	0
11	Citizenship on the document	Australia	0
12	Please tell us about your current employment status.	Employed	0
13	Please tell us about your occupation or business activity.	real estate agent	0
14	Please tell us about business you may conduct in other country(s) besides where you are registered for tax purposes?	No	0
15	Is your residential activity or business registered or conducted in preferential tax zone (for instance, free economic zone, offshore jurisdiction)?	No	0
16	Please tell us about your annual turnover, in individual or business activity, which is handled in cash.	0-10k (more or little of my turnover is in cash)	0
17	Please tell us about your annual turnover, in individual or business activity, which is handled in cryptocurrency.	0-10k (more or little of my turnover is in cryptocurrency)	0
18	Please tell us about your source(s) of income. Select more than one box if necessary.	Salary / Business income, Investments	0
19	Please tell us about your source(s) of wealth. Select more than one box if necessary.	Property sale	0
20	Please select the service(s) you plan to use. Select more than one box if necessary.	Crypto Trading, Long term investment, Arbitrage Trading, Participate in Initial Exchange Offering, Crypto payment	5
21	How much do you plan to deposit per year USD and crypto combined?	10 000-100 000	0
22	Please tell us which countries the funds will be received and/or transferred from.	Australia	0
23	Let us know what your level of experience is with cryptocurrency trading? Please select one.	Beginner	0
24	How many years of experience do you have in crypto trading?	< 1 Year	0
25	Are you, an immediate family member or a close associate, entrusted, or have been entrusted, with prominent public functions in any country or international institution? This could be a public office, a government role, a regulatory role or a senior military position, at home or overseas.	No	0

Comment

Add 8 Comments...

Add Comment

DATE & TIME	FULL NAME	ROLE	COMMENT
3/14/2022 3:05:08 PM			Based on the KYC responses, the Customer is considered Low Risk. Screening is performed against the Customer with 8 hits. All hits can be discounted due to name mismatch. Overall, KYC Onboarding Analyst [REDACTED] is of the view that the initial AML CTF assessment result is consistent with the Customer's profile and does not oppose the decision to onboard the Customer with Low Risk [RISK SCORE 5].



Client	HID	Redemption	Number of redemptions
1	5S89KBQ	71,100.00	2
2	34DUM6K	18,788.00	1
3	A4UZ1UA	120,090.00	3
4	J8AWCBB	1,270.00	1
5	C85O85D	9,527.39	3
6	CNF1PAS	29,880.00	2
7	UIZ8G2I	12,650.00	7
8	KY08VGL	11,480.00	2
			21

**Note**

The bank statements for clients' redemptions were provided separately. When cross checked the redemption from the bank statement, it has to exclude the fee \$100 to come up with the net redemption amount.

**Client 1 - 5S89KBQ**

Redemption	Redemption amount	Fee	Net amount	Application date	Approval date	Bank Name	Comments
1	40,000.00	100.00	39,900.00	08/01/2022	11/01/2022	FV Bank	
2	31,100.00	100.00	31,000.00	20/05/2022	20/05/2022	FV Bank	
	71,100.00	200.00	70,900.00				

**Client 2 - 34DUM6K**

Redemption	Redemption amount	Fee	Net amount	Application date	Approval date	Bank Name	Comments
1	18,788.00	100.00	18,688.00	20/11/2021	23/11/2021	FV Bank	
	18,788.00	100.00	18,688.00				

**Client 3 - A4UZ1UA**

Redemption	Redemption amount	Fee	Net amount	Application date	Approval date	Bank Name	Comments
1	99,990.00	100.00	99,890.00	17/11/2021	22/11/2021	FV Bank	
2	10,100.00	100.00	10,000.00	10/08/2022	11/08/2022	Mercantile Bank	
3	10,000.00	100.00	9,900.00	15/09/2022	16/09/2022	Mercantile Bank	
	120,090.00	300.00	119,790.00				

**Client 4 - J8AWCBB**

Redemption	Redemption amount	Fee	Net amount	Application date	Approval date	Bank Name	Comments
1	1,270.00	100.00	1,170.00	23/01/2022	24/01/2022	FV Bank	
	1,270.00	100.00	1,170.00				

**Client 5 - C85O85D**

Redemption	Redemption amount	Fee	Net amount	Application date	Approval date	Bank Name	Comments
1	3,718.81	100.00	3,618.81	07/01/2022	14/01/2022	FV Bank	
2	2,833.58	100.00	2,733.58	13/01/2022	17/01/2022	FV Bank	Date on bank statement is 14/01/2022 due to the weekend
3	2,975.00	100.00	2,875.00	27/01/2022	28/01/2022	FV Bank	
	9,527.39	300.00	9,227.39				

**Client 6 - CNF1PAS**

Redemption	Redemption amount	Fee	Net amount	Application date	Approval date	Bank Name	Comments
1	17,100.00	100.00	17,000.00	03/02/2022	04/02/2022	FV Bank	
2	12,780.00	100.00	12,680.00	12/05/2022	13/05/2022	FV Bank	
	29,880.00	200.00	29,680.00				

**Client 7 - UIZ8G2I**

Redemption	Redemption amount	Fee	Net amount	Application date	Approval date	Bank Name	Comments
1	1,900.00	100.00	1,800.00	22/11/2021	23/11/2021	FV Bank	
2	2,000.00	100.00	1,900.00	08/03/2022	09/03/2022	FV Bank	
3	2,000.00	100.00	1,900.00	05/04/2022	06/04/2022	FV Bank	
4	2,000.00	100.00	1,900.00	14/05/2022	16/05/2022	FV Bank	
5	2,100.00	100.00	2,000.00	21/06/2022	22/06/2022	FV Bank	
6	1,500.00	100.00	1,400.00	14/07/2022	15/07/2022	FV Bank	
7	1,150.00	100.00	1,050.00	24/08/2022	25/08/2022	FV Bank	
	12,650.00	700.00	11,950.00				

**Client 8 - KY08VGL**

Redemption	Redemption amount	Fee	Net amount	Application date	Approval date	Bank Name	Comments
1	1,500.00	100.00	1,400.00	14/11/2021	23/11/2021	FV Bank	
2	9,980.00	100.00	9,880.00	04/01/2022	04/01/2022	FV Bank	
	11,480.00	200.00	11,280.00				







**FV Bank International Inc.**  
270 Avenida Munoz Rivera Suite 1102  
San Juan, Puerto Rico, 00918  
Phone +1 917- 737-0577

Himalaya International Clearing Ltd  
1, Commerce House, Wickhams Cay  
Road Town, Tortola, P.O Box 3140  
British Virgin Islands

Account type:                      **Account (USD)**  
Account number:                **7801000254**  
Period:                              **01-01-2022 to 01-31-2022**

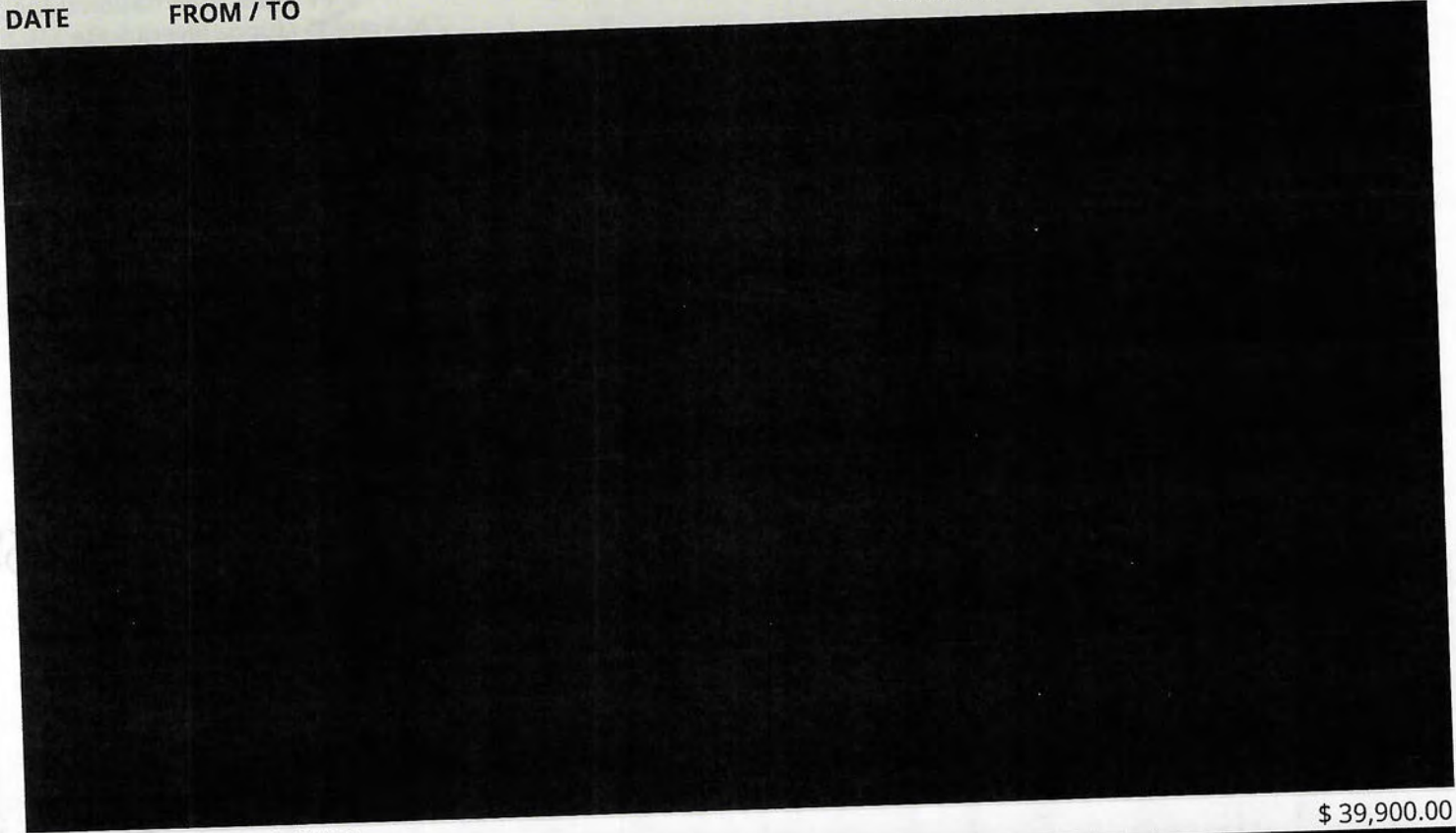
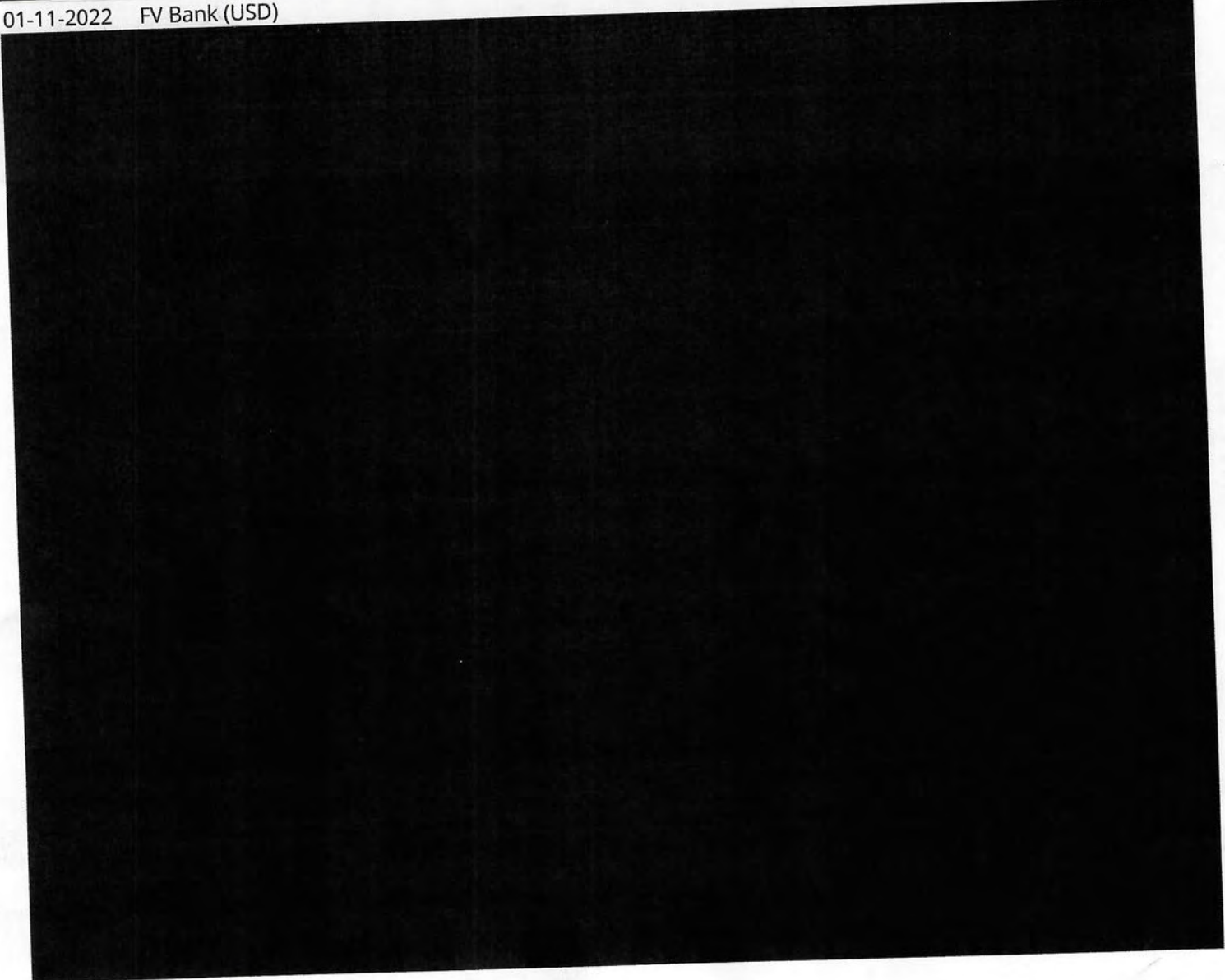
### ACCOUNT SUMMARY

Balance at begin of period: [REDACTED]  
Total received: [REDACTED]

Balance at end of period: [REDACTED]  
Total paid: [REDACTED]

DATE	FROM / TO	DEPOSIT	WITHDRAWAL
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[REDACTED]			
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DATE	FROM / TO	DEPOSIT	WITHDRAWAL
			
01-11-2022	FV Bank (USD)		\$ 39,900.00
			





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**FV Bank International Inc.**  
270 Avenida Munoz Rivera Suite 1102  
San Juan, Puerto Rico, 00918  
Phone +1 917- 737-0577

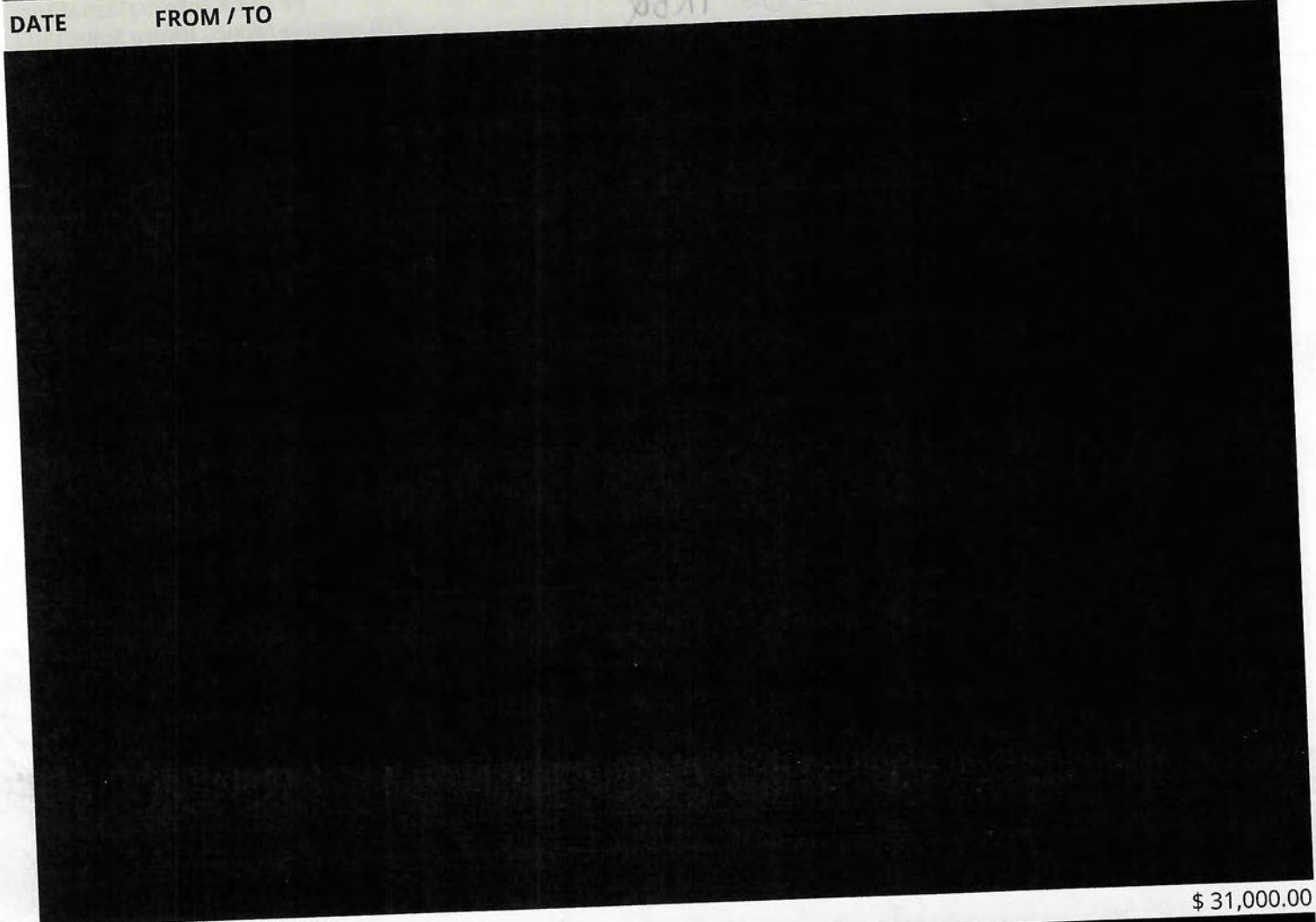
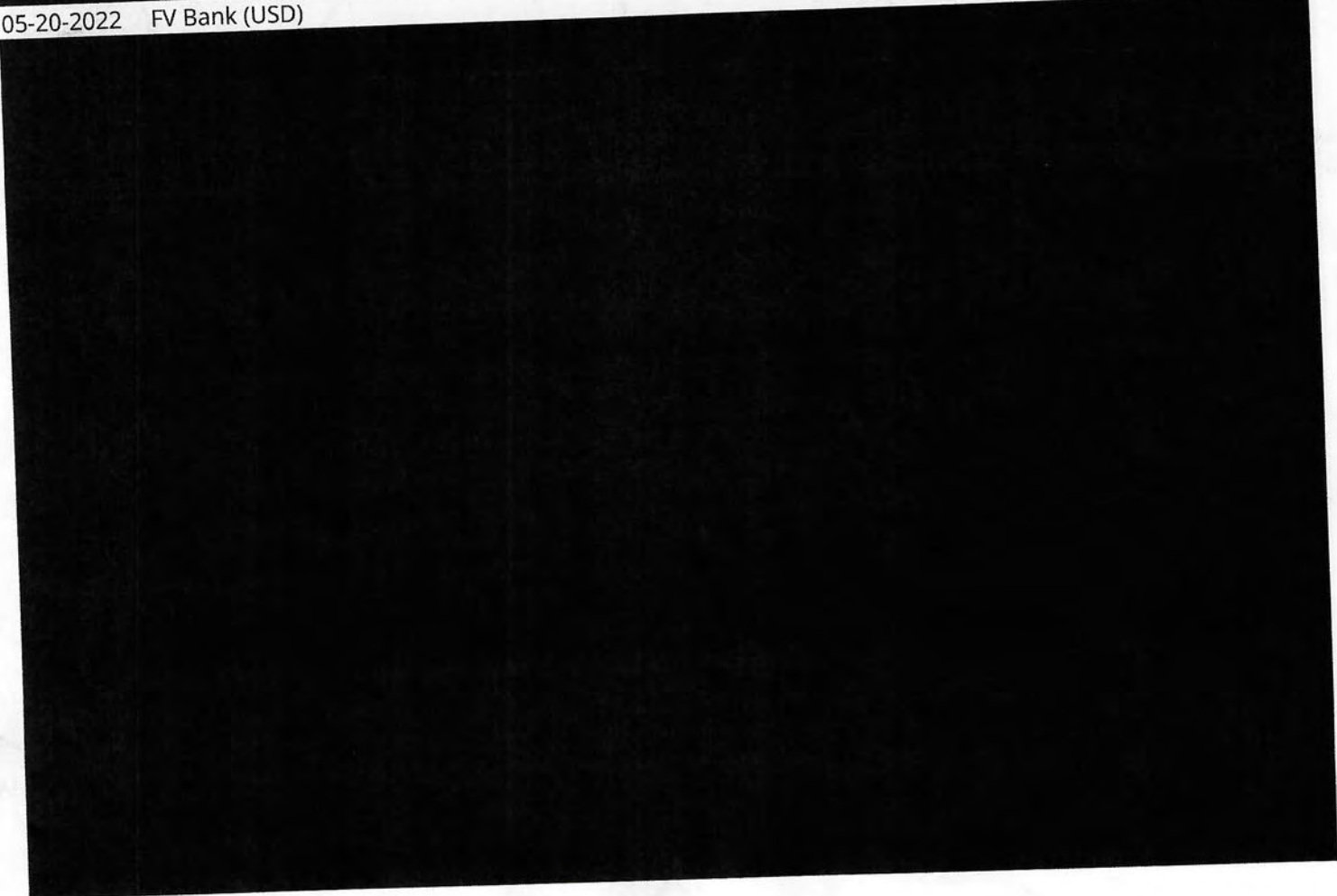
Himalaya International Clearing Ltd  
1, Commerce House, Wickhams Cay  
Road Town, Tortola, P.O Box 3140  
British Virgin Islands

Account type:      **Account (USD)**  
Account number:    **7801000254**  
Period:                **05-01-2022 to 05-31-2022**

### ACCOUNT SUMMARY

Balance at begin of period:		Balance at end of period:	
Total received:		Total paid:	

DATE	FROM / TO	DEPOSIT	WITHDRAWAL

DATE	FROM / TO	DEPOSIT	WITHDRAWAL
			
05-20-2022	FV Bank (USD)		\$ 31,000.00
			



34 DUM6K



**FV Bank International Inc.**  
270 Avenida Munoz Rivera Suite 1102  
San Juan, Puerto Rico, 00918  
Phone +1 917- 737-0577

Himalaya International Clearing Ltd  
1, Commerce House, Wickhams Cay  
Road Town, Tortola, P.O Box 3140  
British Virgin Islands

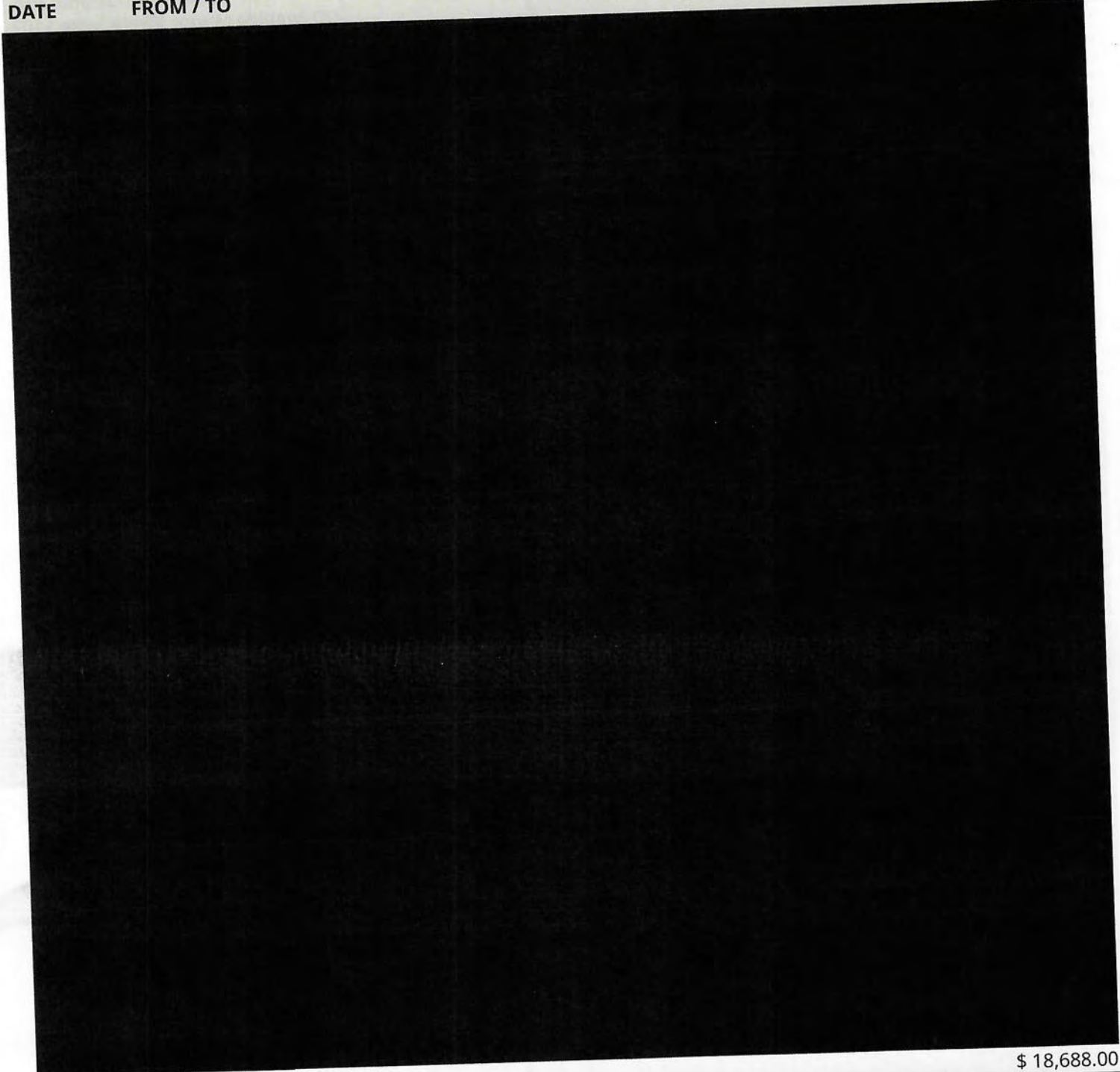
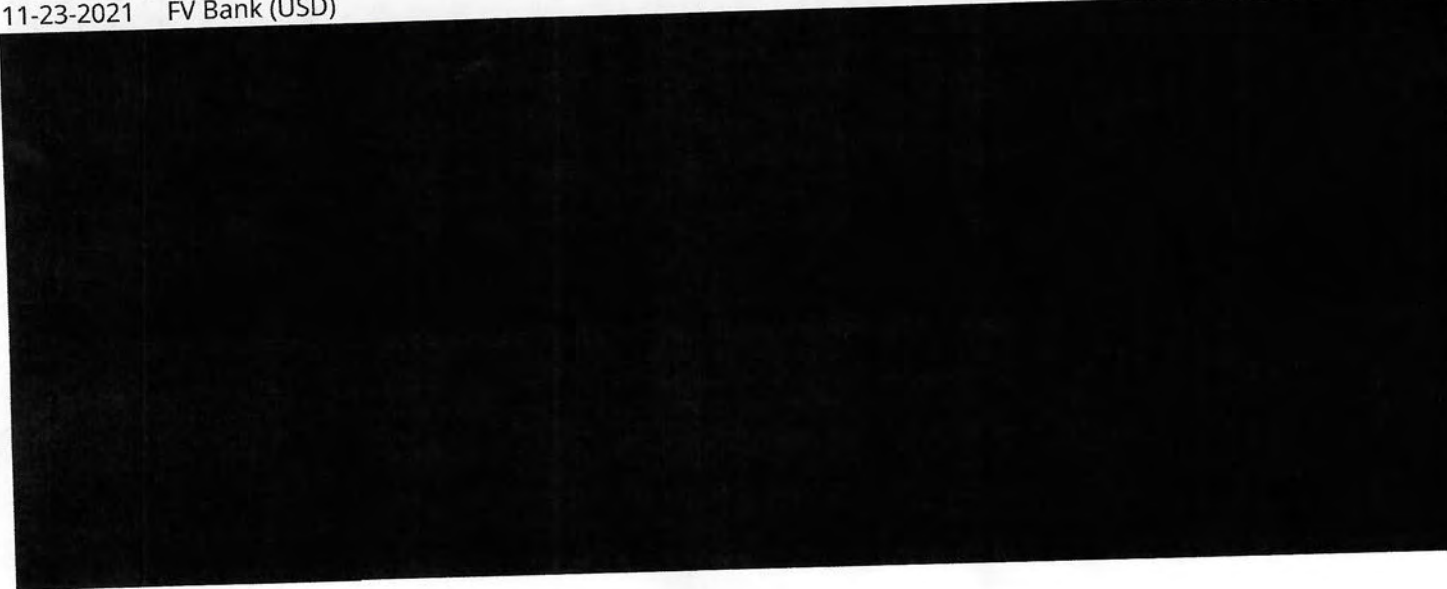
Account type: Account (USD)  
Account number: 7801000254  
Period: 11-01-2021 to 11-30-2021

### ACCOUNT SUMMARY

Balance at begin of period:  
Total received:

Balance at end of period:  
Total paid:

DATE	FROM / TO	DEPOSIT	WITHDRAWAL
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DATE	FROM / TO	DEPOSIT	WITHDRAWAL
			
11-23-2021	FV Bank (USD)	\$ 18,688.00	

A4UZ1UA



**FV Bank International Inc.**  
270 Avenida Munoz Rivera Suite 1102  
San Juan, Puerto Rico, 00918  
Phone +1 917- 737-0577

Himalaya International Clearing Ltd  
1, Commerce House, Wickhams Cay  
Road Town, Tortola, P.O Box 3140  
British Virgin Islands

Account type: **Account (USD)**  
Account number: **7801000254**  
Period: **11-01-2021 to 11-30-2021**



### ACCOUNT SUMMARY

Balance at begin of period:  
Total received:

Balance at end of period:  
Total paid:

DATE	FROM / TO	DEPOSIT	WITHDRAWAL
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DATE	FROM / TO	DEPOSIT	WITHDRAWAL
			
11-22-2021	FV Bank (USD)		\$ 99,890.00
			

A4UZ1UA



Mercantile Bank  
International

August 2022

# Bank Monthly Statement

Mon, Sep 05, 06:05:48 EDT

**MBI10133-0000** / ACCOUNT

**Himalaya International Clearing Ltd.** / LEGAL ENTITY

Commerce House, , Road Town,  
Tortola,, Tortola VG1110 Virgin Islands (British)

Monthly Statement for an account

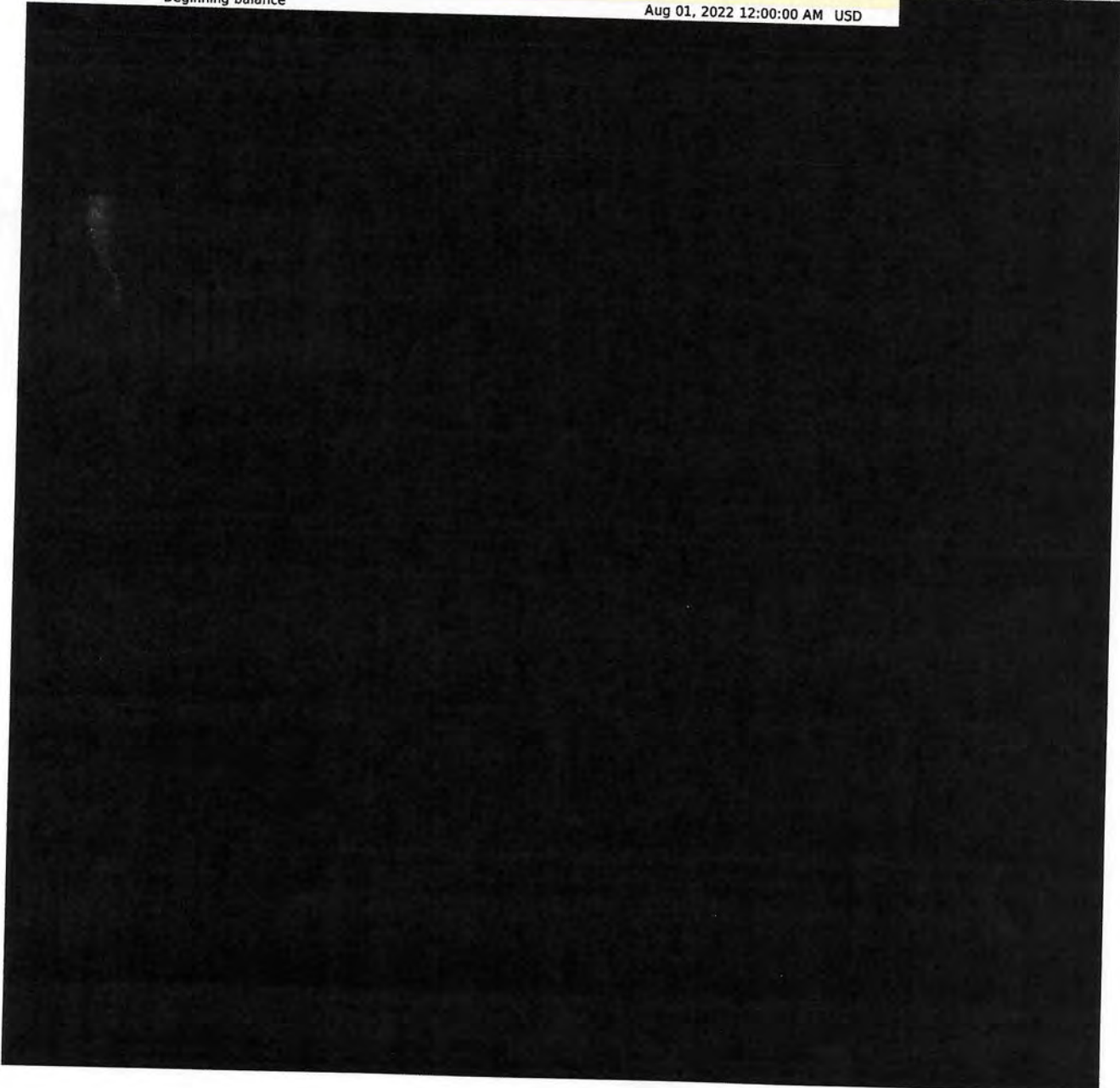
Account	Statement Begin Date	Statement End Date	Report Run Date
MBI10133-0000	Aug 01, 2022 12:00:00 AM	Aug 31, 2022 11:59:59 PM	Sep 05, 2022 06:05:48 AM

## MBI10133-0000 Balance Summary

Product	Beginning Balance	Deposits	Withdrawals	Allocations	Fees	Settlement	Other	Ending Balance
USD								

## MBI10133-0000 Transactions

Transaction Id	Transaction Type	Counter Party	Transaction Date	Product	Amount	Balance
USD	Beginning balance		Aug 01, 2022 12:00:00 AM	USD		





43352 Withdrawal

Aug 11, 2022 12:06:21 PM USD

-10,000.00

A4UZ1UA

Ending balance

Aug 31, 2022 11:59:59 PM USD

## Disclaimer

## IMPORTANT ACCOUNT INFORMATION

Custody asset administration and settlement services are offered by the Mercantile Bank International Corporation, a Puerto Rico corporation licensed to conduct business as an international financial entity pursuant to the provisions of Puerto Rico's Act No. 273-2012 (as amended) and supervised by the Office of the Commissioner of Financial Institutions in Puerto Rico. Order routing technology licensing and services are provided by the San Juan Mercantile Exchange, a Delaware corporation under common ownership with MBI. For additional details on the services provided by these affiliated, but separate legal entities, and the fees reflected on this account statement, please consult the MBI Client Agreement and Terms of Service along with the SJMX Technology License & User Agreement and Terms of Service.

MBI IS NOT FEDERALLY INSURED. IF MBI FAILS, THE FEDERAL GOVERNMENT DOES NOT GUARANTEE THAT YOU WILL GET YOUR MONEY BACK. MBI IS ALSO NOT GUARANTEED BY ANY STATE SPONSORED INSURANCE SCHEME IN PUERTO RICO. Fiat currency held at MBI may be eligible in certain circumstances for FDIC "pass through" insurance through MBI's correspondents. Digital assets may be privately insured in amounts determined by MBI's digital assets sub-custodians and/or by MBI, in its discretion. Please refer to the relevant sections of your MBI Client Agreement and MBI Terms of Service for additional information on the eligibility of assets held by MBI for insurance.

Summaries of balances and transaction activity rendered by MBI and SJMX from time to time shall be conclusively deemed correct and final unless Client immediately gives notice of any purported error. CLIENTS ARE RESPONSIBLE FOR PROMPTLY EXAMING THESE STATEMENTS FOR POTENTIAL ERRORS AND NOTIFYING MBI/SJMX. IF A CLIENT DOES NOT NOTIFY MBI/SJMX OF THE EXISTENCE OF POTENTIAL OR PURPORTED ERRORS WITHIN TEN (10) DAYS' OF THE DATE THIS STATEMENT WAS FIRST PROVIDED TO CLIENT, THE STATEMENT SHALL BE DEEMED ACCEPTED BY CLIENT.

Please reach out to [operations@mercantile-bank.com](mailto:operations@mercantile-bank.com) with any questions pertaining to this document.



Mercantile Bank  
International

Tue, Oct 11, 09:22:02 EDT

September 2022

## Bank Monthly Statement

**MBI10133-0000** / ACCOUNT

**Himalaya International Clearing Ltd.** / LEGAL ENTITY

Commerce House, Road Town  
Tortola, Tortola VG1110 Virgin Islands (British)

Monthly Statement for an account

Account	Statement Begin Date	Statement End Date	Report Run Date
MBI10133-0000	Sep 01, 2022 12:00:00 AM	Sep 30, 2022 11:59:59 PM	Oct 11, 2022 09:22:02 AM

### MBI10133-0000 Balance Summary

Product	Beginning Balance	Deposits	Withdrawals	Allocations	Fees	Settlement	Other	Ending Balance
USD								

### MBI10133-0000 Transactions

Transaction Id	Transaction Type	Counter Party	Transaction Date	Product	Amount	Balance
USD	Beginning balance		Sep 01, 2022 12:00:00 AM	USD		

A4UZ1UA

46582 Withdrawal

Sep 16, 2022 10:38:47 AM USD

-9,900.00



Ending balance

Sep 30, 2022 11:59:59 PM USD

## Disclaimer

## IMPORTANT ACCOUNT INFORMATION

Custody asset administration and settlement services are offered by the Mercantile Bank International Corporation, a Puerto Rico corporation licensed to conduct business as an international financial entity pursuant to the provisions of Puerto Rico's Act No. 273-2012 (as amended) and supervised by the Office of the Commissioner of Financial Institutions in Puerto Rico. Order routing technology licensing and services are provided by the San Juan Mercantile Exchange, a Delaware corporation under common ownership with MBI. For additional details on the services provided by these affiliated, but separate legal entities, and the fees reflected on this account statement, please consult the MBI Client Agreement and Terms of Service along with the SJMX Technology License & User Agreement and Terms of Service.

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Summaries of balances and transaction activity rendered by MBI and SJMX from time to time shall be conclusively deemed correct and final unless Client immediately gives notice of any purported error. CLIENTS ARE RESPONSIBLE FOR PROMPTLY EXAMINING THESE STATEMENTS FOR POTENTIAL ERRORS AND NOTIFYING MBI/SJMX. IF A CLIENT DOES NOT NOTIFY MBI/SJMX OF THE EXISTENCE OF POTENTIAL OR PURPORTED ERRORS WITHIN TEN (10) DAYS' OF THE DATE THIS STATEMENT WAS FIRST PROVIDED TO CLIENT, THE STATEMENT SHALL BE DEEMED ACCEPTED BY CLIENT.

Please reach out to [operations@mercantile-bank.com](mailto:operations@mercantile-bank.com) with any questions pertaining to this document.





**F BANK**

**FV Bank International Inc.**  
270 Avenida Munoz Rivera Suite 1102  
San Juan, Puerto Rico, 00918  
Phone +1 917- 737-0577

**Himalaya International Clearing Ltd**  
1, Commerce House, Wickhams Cay  
Road Town, Tortola, P.O. Box 3140  
British Virgin Islands

Account type: **Account (USD)**  
Account number: **7801000254**  
Period: **01-01-2022 to 01-31-2022**

## ACCOUNT SUMMARY

Balance at begin of period:  
Total received:

Balance at end of period:  
Total paid:

DATE	FROM / TO	DEPOSIT	WITHDRAWAL
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DATE	FROM / TO	DEPOSIT	WITHDRAWAL
[REDACTED]			
01-24-2022	FV Bank (USD)		\$ 1,170.00
[REDACTED]			



Account type: **Account (USD)**  
Account number: **7801000254**  
Period: **01-01-2022 to 01-31-2022**

Balance at begin of period:  
Total received:

Balance at end of period:  
Total paid:

DATE	FROM / TO	DEPOSIT	WITHDRAWAL
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[illegible]



DATE	FROM / TO	DEPOSIT	WITHDRAWAL
[REDACTED]			
01-28-2022	FV Bank (USD)		\$ 2,875.00
[REDACTED]			



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DATE	FROM / TO	DEPOSIT	WITHDRAWAL
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01-14-2022	FV Bank (USD)		
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\$ 2,733.58

DATE	FROM / TO	DEPOSIT	WITHDRAWAL
01-14-2022	FV Bank (USD)		\$ 3,618.81

[illegible]



DATE	FROM / TO	DEPOSIT	WITHDRAWAL
02-04-2022	FV Bank (USD)		\$ 17,000.00



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**FV Bank International Inc.**  
270 Avenida Munoz Rivera Suite 1102  
San Juan, Puerto Rico, 00918  
Phone +1 917- 737-0577

**Himalaya International Clearing Ltd**  
1, Commerce House, Wickhams Cay  
Road Town, Tortola, P.O Box 3140  
British Virgin Islands

Account type:                      **Account (USD)**  
Account number:                **7801000254**  
Period:                              **05-01-2022 to 05-31-2022**

### ACCOUNT SUMMARY

Balance at begin of period:  
Total received:

[REDACTED]

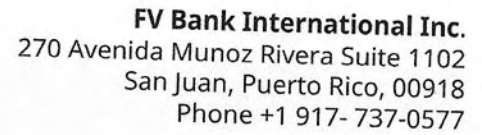
Balance at end of period:  
Total paid:

[REDACTED]

DATE	FROM / TO	DEPOSIT	WITHDRAWAL
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[REDACTED]			
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DATE	FROM / TO	DEPOSIT	WITHDRAWAL
[REDACTED]			
05-13-2022	FV Bank (USD)		\$ 12,680.00
[REDACTED]			



Account type: **Account (USD)**  
Account number: **7801000254**  
Period: **11-01-2021 to 11-30-2021**

Balance at begin of period:  
Total received:

Balance at end of period:  
Total paid:

DATE	FROM / TO	DEPOSIT	WITHDRAWAL
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DATE	FROM / TO	DEPOSIT	WITHDRAWAL
[REDACTED]			
11-23-2021	FV Bank (USD)		\$ 1,800.00
[REDACTED]			



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**FV Bank International Inc.**  
270 Avenida Munoz Rivera Suite 1102  
San Juan, Puerto Rico, 00918  
Phone +1 917- 737-0577

Himalaya International Clearing Ltd  
1, Commerce House, Wickhams Cay  
Road Town, Tortola, P.O Box 3140  
British Virgin Islands

Account type:                      **Account (USD)**  
Account number:                **7801000254**  
Period:                              **03-01-2022 to 03-31-2022**

### ACCOUNT SUMMARY

Balance at begin of period:  
Total received:

[REDACTED]

Balance at end of period:  
Total paid:

[REDACTED]

DATE	FROM / TO	DEPOSIT	WITHDRAWAL
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[REDACTED]			
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DATE	FROM / TO	DEPOSIT	WITHDRAWAL
[REDACTED]			
03-09-2022	FV Bank (USD)		\$ 1,900.00

[REDACTED]			
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UJZ8G21



**FV Bank International Inc.**  
270 Avenida Munoz Rivera Suite 1102  
San Juan, Puerto Rico, 00918  
Phone +1 917- 737-0577

**Himalaya International Clearing Ltd**  
1, Commerce House, Wickhams Cay  
Road Town, Tortola, P.O Box 3140  
British Virgin Islands

Account type: **Account (USD)**  
Account number: **7801000254**  
Period: **04-01-2022 to 04-30-2022**

## ACCOUNT SUMMARY

Balance at begin of period:  
Total received:

Balance at end of period:  
Total paid:

DATE	FROM / TO	DEPOSIT	WITHDRAWAL
------	-----------	---------	------------



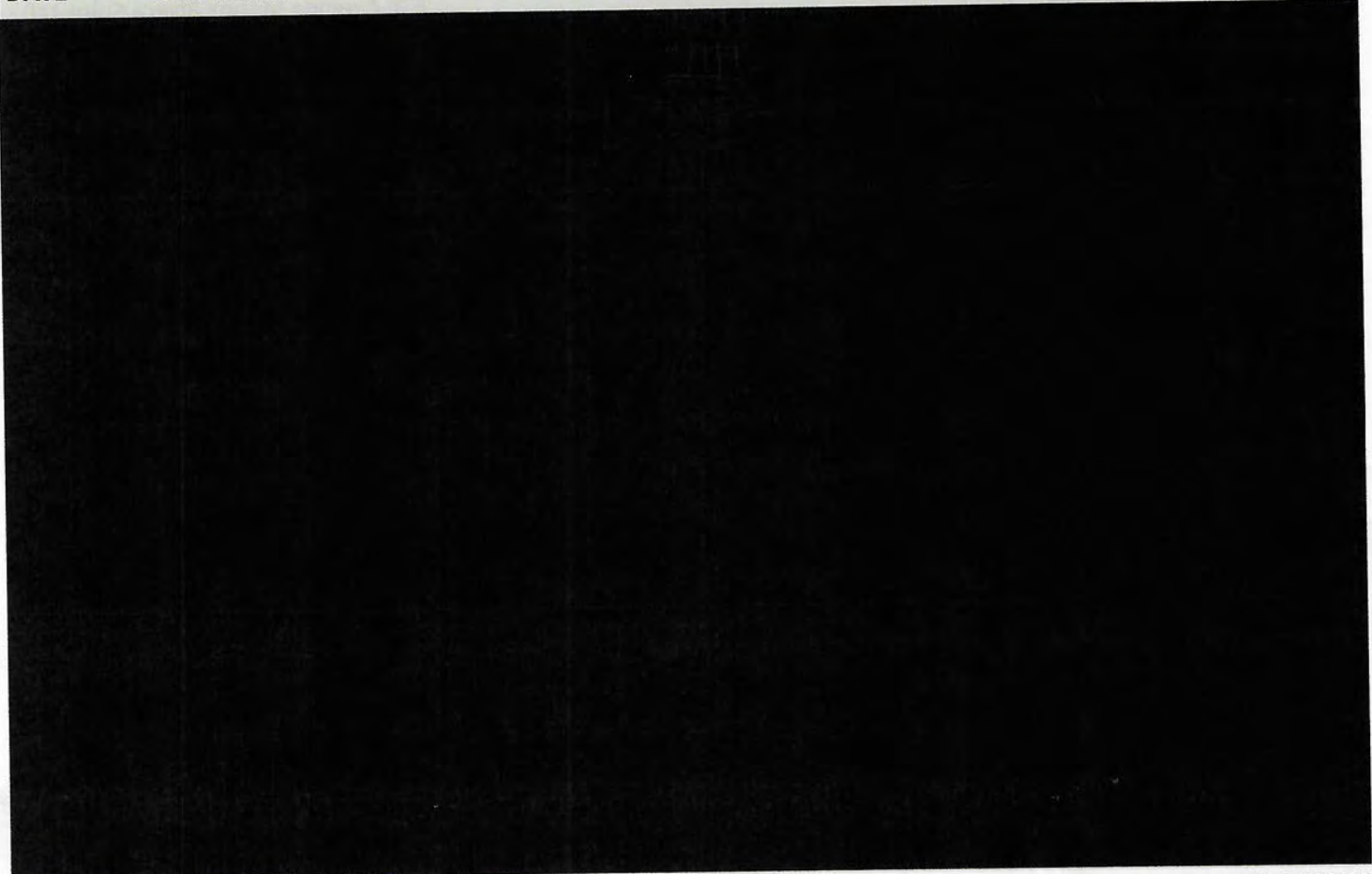

DATE	FROM / TO	DEPOSIT	WITHDRAWAL
[REDACTED]			
04-06-2022	FV Bank (USD)		\$ 1,900.00
[REDACTED]			



UJZ8G21  
Account

05-01-2022 to 05-31-2022

## This image appears to be a scan of a document page that is either blank or has been severely underexposed. The entire frame is filled with a dark, grainy texture, with no legible text or identifiable figures visible. A small, faint white speck is present near the top left corner.

DATE	FROM / TO	DEPOSIT	WITHDRAWAL
			
05-16-2022	FV Bank (USD)		\$ 1,900.00
			



**FV Bank International Inc.**  
270 Avenida Munoz Rivera Suite 1102  
San Juan, Puerto Rico, 00918  
Phone +1 917- 737-0577

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UJ28G21

**Himalaya International Clearing Ltd**  
1, Commerce House, Wickhams Cay  
Road Town, Tortola, P.O Box 3140  
British Virgin Islands

Account type: **Account (USD)**  
Account number: **7801000254**  
Period: **06-01-2022 to 06-30-2022**

### ACCOUNT SUMMARY

Balance at begin of period:  
Total received:

Balance at end of period:  
Total paid:

DATE	FROM / TO	DEPOSIT	WITHDRAWAL
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DATE	FROM / TO	DEPOSIT	WITHDRAWAL
<div></div>			
06-22-2022	<div></div>		\$ 2,000.00
<div></div>			



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UJZ8G21

The image shows a dark, textured surface, likely the cover or endpaper of an old book. The texture is grainy and uneven, with subtle variations in tone from deep black to dark grey. A vertical strip of lighter, off-white material is visible along the right edge, suggesting the hinge or spine area of the book. The overall appearance is aged and worn.

DATE	FROM / TO	DEPOSIT	WITHDRAWAL
07-15-2022			\$ 1,400.00



**FV Bank International Inc.**  
270 Avenida Munoz Rivera Suite 1102  
San Juan, Puerto Rico, 00918  
Phone +1 917- 737-0577

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UJZ8G21

Himalaya International Clearing Ltd  
1, Commerce House, Wickhams Cay  
Road Town, Tortola, P.O Box 3140  
British Virgin Islands

Account type: Account (USD)  
Account number: 7801000254  
Period: 08-01-2022 to 08-31-2022

#### ACCOUNT SUMMARY

Balance at begin of period:  
Total received:

Balance at end of period:  
Total paid:

DATE	FROM / TO	DEPOSIT	WITHDRAWAL
------	-----------	---------	------------



DATE	FROM / TO	DEPOSIT	WITHDRAWAL

08-25-2022

\$ 1,050.00





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KY08VGL

**FV Bank International Inc.**  
270 Avenida Munoz Rivera Suite 1102  
San Juan, Puerto Rico, 00918  
Phone +1 917- 737-0577

**Himalaya International Clearing Ltd**  
1, Commerce House, Wickhams Cay  
Road Town, Tortola, P.O Box 3140  
British Virgin Islands

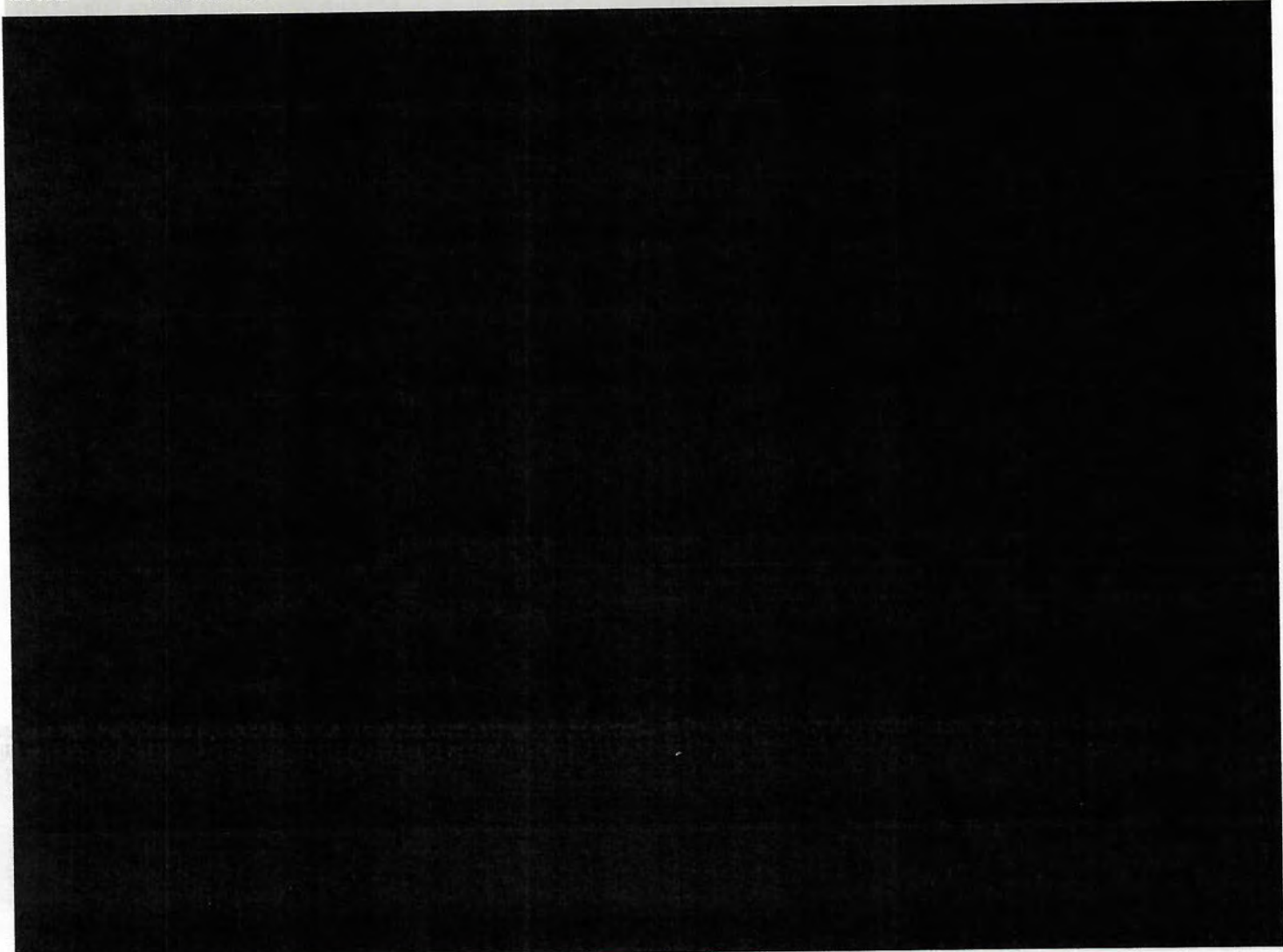
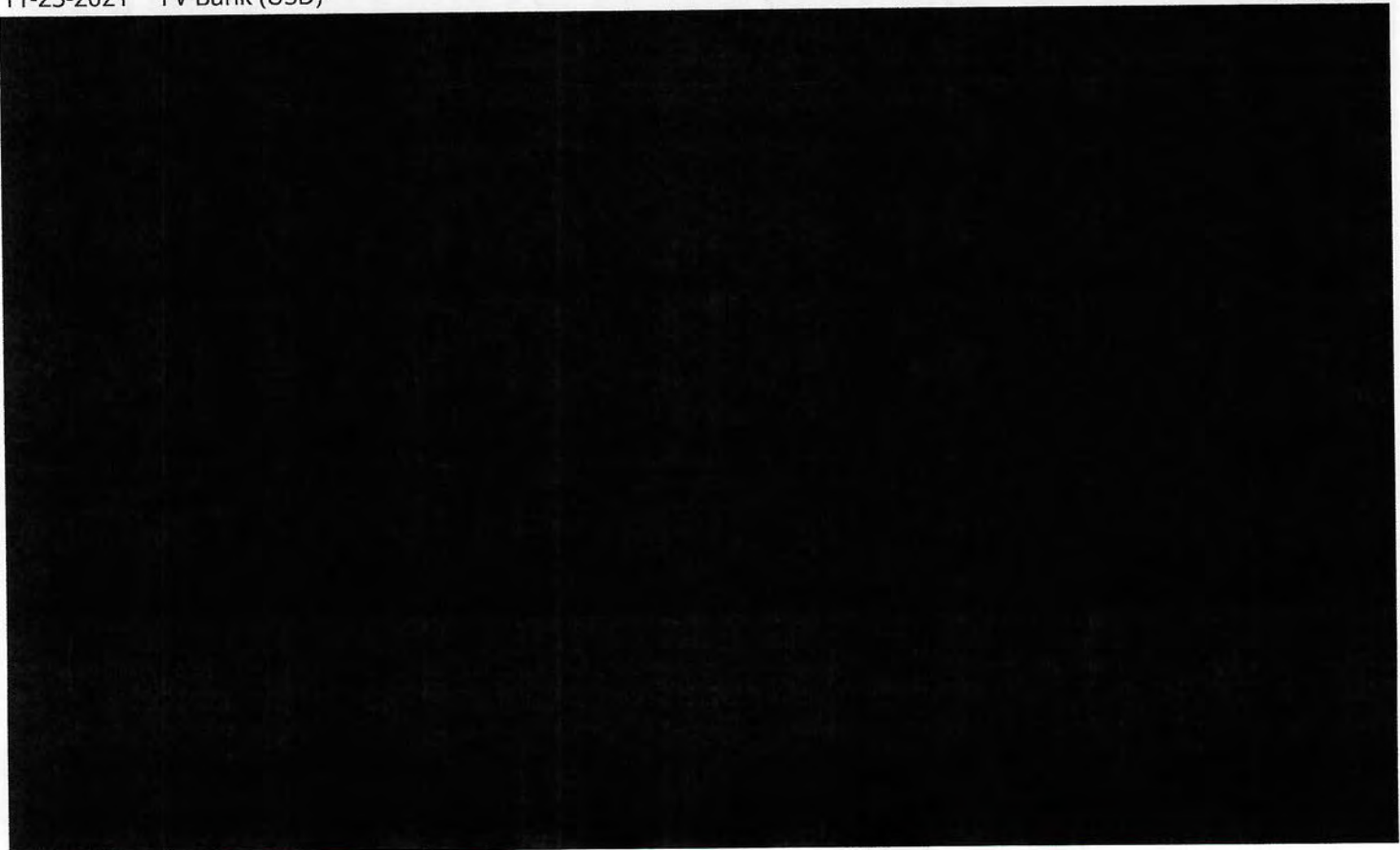
Account type: **Account (USD)**  
Account number: **7801000254**  
Period: **11-01-2021 to 11-30-2021**

#### ACCOUNT SUMMARY

Balance at begin of period:  
Total received:

Balance at end of period:  
Total paid:

DATE	FROM / TO	DEPOSIT	WITHDRAWAL
------	-----------	---------	------------

DATE	FROM / TO	DEPOSIT	WITHDRAWAL
			
11-23-2021	FV Bank (USD)		\$ 1,400.00
			

HID  
KY08VGL

DEPOSIT WITHDRAWAL



DATE	FROM / TO	DEPOSIT	WITHDRAWAL
01-04-2022	FV Bank (USD)		\$ 9,880.00



# **MERCANTILE BANK INTERNATIONAL CORP.**

## **ONLINE CUSTODY & BANKING SERVICES AGREEMENT**

ALL CLIENTS OF MERCANTILE BANK INTERNATIONAL CORP. ("MBI") THAT OPEN ACCOUNTS SHALL BE SUBJECT TO, AND SHALL BE BOUND BY, THIS ONLINE CUSTODY & BANKING SERVICES AGREEMENT.

THIS ONLINE CUSTODY & BANKING SERVICES AGREEMENT IS SUBJECT TO MODIFICATION BY MBI AT ANY TIME. REVISED TERMS SHALL BE EFFECTIVE IMMEDIATELY UPON PUBLICATION IN ELECTRONIC FORM ON MBI'S WEBSITE OR RECEIPT BY CLIENT VIA EMAIL.

VERSION 2022-09  
LAST REVISED: 2020-06

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- 2.2. INFORMATION YOU GIVE US AT ACCOUNT OPENING
- 2.3. ACCOUNT INFORMATION
- 2.4. NOT FDIC INSURED
- 2.5. CHANGES TO THIS AGREEMENT
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11.11. MISCELLANEOUS

**SCHEDULE OF FEES**

## 1. DEFINITIONS

The following terms and definitions apply when used in this Online Custody & Banking Services Agreement. Terms used but not defined below shall have the meaning assigned to them in the Uniform Commercial Code. References to the Uniform Commercial Code are to the Uniform Commercial Code in the State of New York.

**“ACH”** means the Automated Clearing House electronic funds transfer network.

**“Affiliates”** means, with respect to any specified Person any other Person that controls, is controlled by, or is under common control with such specified Person. As used herein, the term “control” means, with respect to any Person, the power, directly or indirectly, to direct or cause the direction of the management and policies of such Person, whether through the ability to exercise voting power, by contract or otherwise.

**“Agreement”** means this Online Custody & Banking Services Agreement, as amended, modified and supplemented from time to time.

**“Authorized Persons”** means any Person authorized in writing by a Client of MBI pursuant to this Agreement to act as an agent on the Client’s behalf in dealing with MBI.

**“Available Account Balance”** means, the balance of funds in your Account available for transfer to an External Account subject to the limitations described in this Agreement. The Available Account Balance may be more or less than the amount of your posted balance. Please consult Section 8 of this Agreement for additional information on how we calculate the Available Account Balance.

**“Business Day”** means any day in which financial institutions of the United States are open for business, unless otherwise specified.

**“Cash Equivalents”** means (a) securities issued, or directly, unconditionally and fully guaranteed or insured, by the United States or any agency or instrumentality thereof (provided that the full faith and credit of the United States is pledged in support thereof) having maturities of not more than one year from the date of acquisition; (b) time deposits and certificates of deposit of any commercial bank having, or which is the principal banking subsidiary of a bank holding company organized under the laws of the United States, any state or province thereof or the District of Columbia having, capital and surplus aggregating in excess of \$500,000,000 and a rating of “A” (or such other similar equivalent rating) or higher by at least one nationally recognized statistical rating organization with maturities of not more than one year from the date of acquisition; (c) repurchase obligations with a term of not more than 30 days for underlying securities of the types described in clause (a) above entered into with any bank meeting the qualifications specified in clause (b) above, which repurchase obligations are secured by a valid perfected security interest in the underlying securities; (d) commercial paper issued by any Person incorporated in the United States rated at least A-1 or the equivalent thereof by Standard & Poor’s Rating Service or at least P-1 or the equivalent thereof by Moody’s Investors Service Inc., and in each case maturing not more than one year after the date of acquisition; and, (e) investments in money market funds substantially all of whose assets are comprised of securities of the types described in clauses (a) through (d) above.

**“Client”** means, at any time, a Person who is recorded in the books and records of MBI as the owner of an active Custody Account.

**“Client Data”** means, with respect to any Client, (i) data from or about such Client, and (ii) data about such Client’s use of the Services.

**“Custodian”** means MBI in the capacity of Client’s appointed Custodian pursuant to this Agreement.

**“Custody Account”** or **“Account”** means the record maintained on the books and records of Custodian of the Fiat Currencies and Digital Assets that Client has placed into the custody and possession of Custodian pursuant to the terms and conditions of this Agreement subject to the direction of the Client and/or its Authorized Persons.

**“Custody Account Statements”** means, with respect to any Client, statements of account for such Client’s Custody Account.

**“Custodial Funds”** has the meaning given to such term in Section 6.2.

**“Digital Assets”** means any virtual currency, token or other digital asset approved by MBI for deposit into Custody Accounts and as identified on MBI’s website or as otherwise notified to Client as “approved” pursuant to this Agreement.



“**Domestic Person**” has the meaning given to such term in Section 2.1.

“**E-SIGN Disclosure and Consent Agreement**” has the meaning given to such term in Section 3.

“**External Client Account**” means, with respect to any Client, any account maintained by such Client at a third party that is approved by MBI as a source or destination for transfers of Fiat Currencies or Digital Assets.

“**Fedwire**” has the meaning given to such term in Section 7.1.

“**Fiat Currencies**” means U.S. dollars and any other government-backed fiat currencies approved by MBI for deposit into Custody Accounts and as identified on MBI’s website or as otherwise notified to Client.

“**MBI**” means Mercantile Bank International Corp., a Puerto Rico corporation, and its successors and permitted assigns.

“**Omnibus Account**” has the meaning given to such term in Section 6.3.

“**Law**” means any applicable constitutional provision, statute, act, code (including the Code), law, regulation, rule, ordinance, order, decree, ruling, proclamation, resolution, judgment, decision, declaration, writ, injunction, arbitral award or interpretative or advisory opinion or letter of any Governmental Authority.

“**Patriot Act**” has the meaning given to such term in Section 11.2.

“**Person**” means any individual, company, corporation (including a non-profit corporation), sole proprietorship, general or limited partnership, limited liability company, joint venture, syndicate, estate, trust, association, organization, Governmental Authority, or other entity.

“**Posted Balance**” means the balance of funds in an Account based solely on items that have been posted as credits or debits. Unlike the available balance, the posted balance does not reflect any holds placed on the Account. The posted balance may be more or less than the amount of your Available Balance.

“**Services**” has the meaning given to such term in Section 2.

“**SWIFT Payment**” has the meaning given to such term in Section 8.1.

“**Subcustodians**” has the meaning given to it in Section 6.2.

The words “**we**,” “**our**,” and “**us**” mean Mercantile Bank International Corp., affiliates, successors, and assigns.

The words “**you**” and “**your**” mean each applicant, account owner and anyone else with access to the account. If there is more than one owner, then these words mean each account owner separately, and all account owners jointly.

## 2. OVERVIEW OF ONLINE CUSTODY AND BANKING SERVICES

Thank you for choosing to work with MBI to meet your online custodial, trust, and banking needs. MBI is an International Financial Entity headquartered in San Juan, Puerto Rico, a territory of the United States of America, and supervised by the Office of the Commissioner of Financial Institutions of Puerto Rico. **MBI IS NOT A MEMBER OF THE FDIC AT THIS TIME, AND AMOUNTS HELD AT MBI ARE NOT ELIGIBLE FOR U.S. FEDERAL DEPOSIT INSURANCE**

This Agreement between you and MBI applies to your use of MBI online custody and banking services described herein. By opening or maintaining an Account with us, you accept and agree to be bound by the terms and conditions of this Agreement and terms of services described herein. The term “**Services**” as used in this Agreement means any service provided by MBI pursuant to this Agreement, including, but not limited to, Custody Account and transfer services, or any other financial product or service made available to you by MBI through its website or by other means.

This Agreement includes the following disclosures applicable to the Services that MBI may agree to provide to you, including: (1) Account features and fees; (2) privacy policies; (3) E-SIGN consent; (4) electronic fund transfer services; (5) funds availability and transaction posting policies; and (6) additional disclosures regarding your Account(s). Fees mentioned throughout this Agreement can be found on [www.mercantile-bank.com](http://www.mercantile-bank.com).

MBI, in its sole discretion, may from time to time choose to work with third-party financial institutions or other service providers. You acknowledge and agree that additional terms may apply to your use of MBI's Services if we offer them in connection with services provided by third-party service providers. You acknowledge and agree that additional terms will apply to your use of MBI's Services if you choose to access them in conjunction with an independent relationship of yours with a third-party with whom we work.

MBI, in its sole discretion, may provide you with a foreign-language translation of this Agreement, and any related agreements, in order to help you better understand the material terms and conditions pursuant to which we offer the Services as well as your obligations hereunder. Foreign-language translations provided by MBI are provided for your convenience, only. In the event of a discrepancy between this English-language Agreement and any foreign-language translation of it, whether provided to you by MBI or otherwise, this English-language Agreement shall control.

## 2.1 Account Application and Approval

In order to open an Account at MBI, eligible persons are required to (i) complete an application by providing such information as MBI may require, in its discretion, to comply with applicable BSA/AML Requirements (as defined in Section 11.2, below), and (ii) if such Account application is approved by MBI, enter into one or more agreements with MBI on terms acceptable to MBI, including this Agreement. MBI may reject any application and MBI may decline to enter into an Agreement with any person, for any reason.

Persons that meet the definition of "domestic person" under Section 2(j) of the International Financial Center Regulatory Act of Puerto Rico are not legally permitted to become a client of MBI. "**Domestic Person**" means any natural person who is a resident of Puerto Rico, or a person incorporated or organized under the laws of Puerto Rico, or a person whose principal place of business is located in Puerto Rico, or a foreign corporation with offices, in accordance with the provisions of the Puerto Rico Internal Revenue Code, considered to be doing business in Puerto Rico, and the Government of Puerto Rico and the agencies, instrumentalities, political subdivision, and public corporations thereof or other entities of the Government of Puerto Rico.

## 2.2. Information You Give Us at Account Opening

**USA Patriot Act Notice.** To help the government fight the funding of terrorism and money laundering activities, the federal laws of the United States of America, including the USA PATRIOT Act, require all financial institutions to obtain, verify and record information that identifies each person or business that opens an account with a financial institution. What this means for you: When you use our services, we will ask for your name, address, date of birth, and other information that will allow us to identify you. For all applicants, we will ask to see a form of identification with your photograph, and we may also ask to see other identifying documents, such as a social security card, if applicable, passport, driver's license or other government-issued form of identification. Clients from non-US jurisdictions may be asked for different or additional identification information, in the discretion of MBI.

**Business Accounts.** When you apply for an Account as a business, we will ask for your business name, address, Tax Identification Number (TIN), and information about the business's beneficial owners. We will also ask for the name, address, date of birth and social security number or similar documents sufficient for us, in our sole discretion, to establish the identity of the natural Person(s) opening the Account as well as the beneficial owners and/or officers of the legal entity. We may seek to validate the information you provide to us using third-party services or other means to ensure we have a reasonable belief of your identity and your business. If we are not able to verify your identity or the identity of the business to our satisfaction, we may decline your application or we may close the Account if it was previously opened.

**Verification of Your Information.** You understand and agree that we may share any information you submit to us in connection with your Account with our affiliates, subsidiaries or other third parties for the purposes of verifying your identity, verifying other information in your application, or for on-going account monitoring. You understand and agree that we may also seek to obtain a credit report in connection with your application, or any other of our Services that your request to receive. Sharing this information is necessary to evaluating your application and providing transaction-related services in compliance with MBI's BSA/AML Requirements.

**False Information.** You understand and acknowledge that the submission of false information at account opening, or failure to timely update us with respect to material changes, may expose MBI to liability because of its BSA/AML Requirements, among other potential sources of legal and regulatory liability. You understand further that your willful or negligent submission of false information at account opening, or any time after becoming a Client, may result in costs to MBI in any form, including, but not

limited to, the costs of defending MBI against legal or regulatory actions brought by competent authorities, or civil and/or criminal monetary penalties. To the fullest extent of the law, you agree to indemnify against such costs as are demonstrably and directly incurred by MBI as a result of your willful or negligent submission of information at account opening or at any time after becoming a Client of MBI. You may also be billed in advance for legal and compliance costs that we reasonably believe may be incurred in connection with government inquiries relating to any Account you control with us. Advance billing for legal and compliance costs shall not exceed 50% of your Account value at the time we receive notice of legal or regulatory actions. Monthly summary invoices shall be provided to you of costs actually incurred by MBI. If you believe that the amounts billed to your Account are in error, you agree that your exclusive remedy is to seek arbitration of your dispute pursuant to the dispute resolution provisions contained in Section 11.8 of this Agreement.

### 2.3. Account Information

*In General.* MBI shall make available information about a Client's Account to the Client through MBI's website, including the current balance and a summary of recent transactions.

*Account Statements.* MBI shall provide or make available to Clients statements summarizing the balances and transaction activity in their Accounts on a monthly basis exclusively by Electronic Means (as defined in Section 3). Account Statements for a Client account shall reflect all activities involving the Account during the preceding calendar month, including posted and pending transfers. Clients are responsible for promptly examining each Account Statement and notifying MBI of any potential errors discrepancies. **MBI WILL NOT BE RESPONSIBLE FOR ERRORS OF WHICH YOU DO NOT NOTIFY US WITHIN THIRTY (30) DAYS AFTER THE DATE OF THE ACCOUNT STATEMENT.**

### 2.4. Not FDIC Insured.

Your Custody Account with MBI is **NOT INSURED** by the U.S. Federal Deposit Insurance Corporation nor by any government-sponsored or non-government sponsored insurance scheme or product in the United States of America, Puerto Rico or any other jurisdiction.

### 2.5. Changes to This Agreement

We may change this Agreement at any time. We may add new terms, delete or amend existing terms, or add new types of accounts and services and discontinue existing types of accounts or services. We may convert existing accounts and services into new accounts and services. We will give you reasonable notice in writing or by any method permitted by law of an adverse change to you in this Agreement. However, we may make changes without prior notice unless otherwise required by law. We may, but do not have to, notify you of changes that we make for security reasons or that we believe are either beneficial or not adverse to you.

When we change this Agreement, the then-current version of this Agreement supersedes all prior versions and governs your Account. If you continue to use your Account or keep it open, you are deemed to accept and agree to the change and are bound by the change. If you do not agree with a change, you may close your account as provided in Section 2.6. below.

### 2.6. Account Closures

You or we may close your Account at any time without prior advance notice. Any amounts held at MBI at the time your Account is closed will be returned to you, subject to the terms, conditions, limitations and fees outlined in this Agreement.

MBI may, in its sole discretion and without notice to you, to the extent permissible under applicable law and other governing documents applicable to your Account, decline, delay, cancel and/or reverse your orders, transactions or instructions, and/or place disbursement and other restrictions on any of your accounts. MBI may close your Account or convert your Account to another account type at its discretion. MBI need not give any advance notice of Account closure initiated by MBI for any reason.

If an account was closed and then we reopen it, the account is subject to our standard terms and fees for that type of account. Any waiver that applied before the account was closed does not apply when we reopen the account.

If your Account reaches a zero balance, or you apply for an account but never deposit funds into it, we may either keep the Account open or close the Account without notice. MBI may also charge you an inactive account fee in the amounts set forth in MBI's fee schedule if there is no activity in your account for a period of three months.

### 3. E-SIGN DISCLOSURE AND CONSENT

#### 3.1 Introduction

This E-SIGN Disclosure and Consent Agreement (the "**E-Sign Agreement**") allows us to provide you with electronic versions of important documents and notices associated with opening an Account at MBI as well as all other information that we may be required to provide to you in writing by law. **YOU MUST AGREE TO THIS E-SIGN AGREEMENT TO OPEN AN ACCOUNT WITH MBI AND USE ITS SERVICES.**

#### 3.2 Additional Definitions That Apply to This Section

"**Electronic Means**" means a form of electronic communication reasonably accessible to the Client, including, but not limited to, records and communications transmitted (i) by email, (ii) by posting to a website designated in email from MBI to you, or (iii) to the extent permissible by law, by access to a website generally designed in advance for such a purpose.

"**Records and Communications**" includes, but is not limited to, all legal and regulatory disclosures, notices or disclosures related to opening an Account at MBI or changes to its terms governing your use of its services, all notices regarding our policies, and any other information we may be required to provide you in writing by law or regulation.

#### 3.3. Records and Communications May be Provided in Electronic Form

You agree that we may provide you with Records and Communications by Electronic Means. Your agreement does not mean that we must provide Records and Communications electronically, but instead that we may deliver some or all of those documents electronically in our sole discretion.

#### 3.4. Requesting Paper Copies

Your consent to receive Records and Communications electronically means that we will not send your paper copies of any Records and Communications transmitted electronically unless you request it or we otherwise deem it appropriate to do so. To request that a paper copy of any particular electronic Records and Communications be mailed to you, please contact us at bankops@mercantile-bank.com. Please specify in your email that you are requesting a paper copy of electronically transmitted Records and Communications and state the title(s) and date(s) of the particular Records and Communications that you are requested. We may charge a fee for mailing you a paper copy of Records and Communications.

#### 3.5. System Requirements

In order to access, view and retain electronic Records and Communications, your access device must meet the following minimum hardware and software requirements:

- i. An internet browser that we support, which include Internet Explorer 10.x or higher, Safari 3.2.x or higher, Firefox 32.x or higher and Chrome 38.x or higher, Mac OSX Safari 5 and higher, Safari for iOS 6 and higher, Chrome for iOS, and Chrome for Android;
- ii. Local, electronic storage capacity to retain Records and Communications or a printer to print them;
- iii. A valid email account and software to access that email account;
- iv. An up-to-date device or devices (e.g., computer, tablet, mobile phone, etc.) suitable for connecting to the Internet and supported by MBI;
- v. An operating system capable of receiving, accessing and displaying Records and Communications from us in electronic form via text-formatted email or access to our website using a supported browser;
- vi. A printer that can interface with your devices, if you want to print paper copies of Records and Communications sent to you in Electronic Form.



By viewing this information in electronic form on any access device that meets the minimum system requirements, you are reasonably demonstrating your ability to access Records and Communications using Electronic Means.

**Please contact us at [bankops@mercantile-bank.com](mailto:bankops@mercantile-bank.com) if you have difficulties accessing or viewing documents by Electronic Means on an access device.**

### 3.6 Withdrawal of Your Consent

You may withdraw your consent to receive Records and Communications by Electronic Means at any time. To withdraw your consent prior to completing the application, simply exit this session prior to acknowledging your acceptance of this agreement. To withdraw your consent after you have submitted your application or opened an Account, please contact us at [onboarding@mercantile-bank.com](mailto:onboarding@mercantile-bank.com). Please note that withdrawal of your consent to receive Records and Communications by Electronic Means will result in the revocation of your access to MBI's services and the termination of our business relationship with you. Such termination will only take effect after a reasonable period to process your withdrawal.

### 3.7. Updating Your Information

It is important that you provide us with true, accurate and complete email address, contact and other information related to this E-Sign Agreement so that we may contact you with Records and Communications regarding your Account. You agree to maintain a valid email address and to promptly notify us of any changes to your email address, contact or other information. You may update your email address, contact and other information through our website.

### 3.8. Federal Law

You acknowledge and agree that this E-Sign Agreement is being provided to you in connection with a transaction that is subject to the federal Electronic Signatures in Global and National Commerce Act, and that you and MBI both intend that the Act apply to the fullest extent possible to validate our ability to conduct business affecting interstate commerce with you by electronic means.

### 3.9. Termination of the E-SIGN Disclosure Provision

MBI reserves the right, in its sole discretion, to discontinue the provision of electric Records and Communications, or to change the terms and condition under which we provide Records and Communications in electronic form. We will provide you with notice of any such termination or changes as required by law.

### 3.10. Consent to Receive Electronic Records

You hereby give your affirmative assent to receiving electronic Records and Communications as described in this E-Sign Agreement. You further agree your computer, mobile phone, tablet or other access device meets the system requirements specified above and that you are able to receive, retain and view electronic Records and Communications, and that you have an active and valid email address at which we may send you electronic Records and Communications.

## 4. **PRIVACY POLICY**

### 4.1. In General

In connection with providing the Services to Clients, you understand and agree that MBI may collect and use Client Data to (i) provide, operate and improve the Services; (ii) comply with any requirement of applicable Laws; (iii) respond or cooperate with requests from regulators or law enforcement about your Account; (iv) personalize the Services; and, (iv) engage in other legitimate business activities, such as sending marketing communications about products, services and offers of MBI and/or its affiliates.

#### 4.2. Third Party Disclosures

*Consumer Accounts.* Our privacy policy for consumers is described in MBI's Privacy Disclosure, which is available on MBI's <http://www.mercantile-bank.com>. We provide this Privacy Disclosure to consumers who open an Account with us for personal use. The Privacy Disclosure describes how we handle personal consumer financial information we collect in the course of our dealings with you and the circumstances under which we may disclose that information to affiliated companies. Except as noted in Section 4.1, MBI does not expect to share information collected from you during the application process with third parties, except as required to verify your identifying information or credit history. Please consult the Privacy Disclosure for more detail on the circumstances in which we may share information collected in the course of our dealings with you after opening an Account and becoming a Client.

*Business Accounts.* We may share information about our experiences with you with affiliated companies and selected third parties. We may also share information that you have provided to us on applications or that we receive from outside sources among MBI Affiliates.

#### 4.3. Anonymized Client Data

MBI will own and have the right to use the Client Data of any Client for any purpose without its consent if such Client Data is (i) combined or aggregated with information relating to other Clients or information derived from other sources, or (ii) is anonymized in a way that reasonably prevents the identification or attribution of such Client Data to such Client.

#### 4.4. Data Protection

MBI shall take commercially reasonable precautions to protect the confidentiality of all Client Data, including by implementing and maintain a written information security program that provides appropriate security measures to safeguard Client Data that is received by MBI in connection with providing Services to Clients.

### 5. **GENERAL TERMS**

#### 5.1. Account Opening and Ownership

We will rely on information you give us in order to open an Account and determine its legal and beneficial ownership. You agree and acknowledge that we may rely on the information in our books and records to determine the owner(s) of your Account.

If the Account owner is a corporation, unincorporated association, limited liability company, limited liability partnership, fiduciary, partnership, sole proprietorship or other legal entity applying in any capacity other than an individual capacity, each person signing the signature card or completing other application requirements represents and agrees that they:

- are fully authorized to execute all documents or otherwise complete our requirements in their stated capacity;
- have furnished all documents or other information necessary to demonstrate that authority; and
- will furnish other documents and complete other requirements as we may request from time to time.

We may refuse to recognize any resolution affecting the Account that is not on any form with which we provide you or that appears to us to be incomplete or improperly executed.

*Changes to Account Information.* When you ask us to make a change to this information or your Account, and we agree to the change, the change is not effective until we have had a reasonable time to act on the new information.

#### 5.2. Reliance on Information

When we process transfers to and from an Account, we may rely upon our records regarding the ownership of the Account and the terms of this Agreement at the time we process the transaction. We do not have to inquire about the source or ownership of any funds we receive or about the destination of any withdrawal from an Account. When we permit a withdrawal from an Account at the request of any signer, or the agent of any signer, in accordance with the terms of this Agreement, the withdrawal is a complete release and discharge of MBI from all claims regarding the withdrawal.

### 5.3. Management of Your Account

You agree that you are solely responsible for the security of your account password and login credentials. To the extent you share this information with an authorized agent(s), or if the integrity of your account password and login credentials is compromised due to actions outside the control of MBI, you specifically agree to assume the risk of any unauthorized acts by your authorized agent(s) or others. You specifically assume the risk of any loss, costs, or expenses caused or incurred thereby if you do not maintain adequate control of and properly manage your Account, including any failure to change or update passwords and login credentials on a reasonable and timely basis.

We may rely conclusively on the validity and binding effect of any item signed, drawn, endorsed, executed, delivered, presented, issued, or otherwise transferred by you or any authorized agent, and you are expressly estopped from denying the validity of any such item and binding effect and authorization of any such action. We shall be under no duty to investigate the authority for the execution and/or delivery of any item or document or the application of any proceeds thereof.

### 5.4. Assignment of Your Account

No pledge, assignment, or other transfer of any Account by you, whether by purchase and assumption, assignment, sale, merger, acquisition, gift or otherwise, shall be binding on us unless acknowledged by us in writing. Unless we agree otherwise in writing, the Account will remain subject to our rights of set off even after we receive notice of the transfer.

We reserve the right not to acknowledge or accept any attempted transfer of an Account. We are not required to accept or recognize an attempted assignment of your Account or any interest in it, including a notice of security interest, or deposit account control agreement, except as required by law. If you have granted to us a security interest in your Account to secure debt you owe to us, we will be deemed to have control of your Account under the Uniform Commercial Code.

## 6. CUSTODY ACCOUNT SERVICES

### 6.1 Our Relationship with You

*Appointment of Custodian.* Client hereby appoints MBI as custodian (the “**Custodian**”) of all Fiat Currency and Digital Asset amounts Client transfers to the possession of Custodian for safekeeping in the Client’s Custody Account, and MBI hereby agrees to serve as custodian of all assets held in the Client’s Custody Account. In its capacity as Custodian, MBI shall hold, possess and administer the Client’s Account in accordance with (i) the Client’s instructions; and (ii) the instructions of Client’s Authorized Persons; and, (iii) the terms of this Agreement. MBI shall identify on its books and records the Fiat Currencies and Digital Assets belonging to its Clients, whether held directly or indirectly through Subcustodians, which MBI may employ to hold Client assets in its sole discretion. Fiat Currency and Digital Asset amounts held at MBI through its Subcustodians may be subject to the terms and conditions of MBI’s agreements with such Subcustodians. MBI may, at any time, cease utilizing any Subcustodian and/or may replace a Subcustodian with a different Subcustodian.

*Standard of Care.* In performing its duties under this Agreement (other than its duties as a custodian), MBI shall exercise the degree of care of a reasonable person. In performing its duties as custodian, Custodian will exercise the degree of care that a reasonable person having responsibility for safekeeping such assets as it has been appointed to hold and possess would exercise under the circumstances.

### 6.2. Instructions Regarding Management of Custodial Funds

In furtherance of its responsibilities as Custodian, and subject to the limitations and qualifications of this Agreement, Client instructs Custodian to:

- (i) Safekeep Fiat Currency and Digital Asset amounts transferred into the Custody Account (the “**Custodial Funds**”)
- (ii) Monitor and maintain the Custodial Funds;
- (iii) Manage the Custodial Funds in accordance with Section 6.3 of this Agreement;
- (iv) Keep timely and accurate records regarding the deposit, disbursement and investment of the Custodial Funds; and,
- (v) Prepare such periodic statements regarding and access to information pertaining to the Custodial Funds in the frequency and manner contemplated in this Agreement.

### 6.3. Management of Funds Held in Custody

Unless otherwise required by applicable Laws, Fiat Currencies and Digital Assets transferred to the Custody Account shall be held (i) in a legally segregated, operationally commingled account (an “**Omnibus Account**”) at one more commercial banks or other financial institutions selected by MBI, in its sole discretion, to act as a subcustodian (each a “**Subcustodian**”). Omnibus Accounts will be in the name of MBI acting as Custodian for the benefit of Clients. Fiat Currencies transferred to a Custody Account may be held in cash or invested in Cash Equivalents. MBI is capable of identifying on its books and records the cash and Cash Equivalents held for the benefit of Clients, whether held directly or indirectly through Subcustodians, in a manner consistent with 12 C.F.R. § 330.5(a)(2).

*Management Fee.* Cash and Cash Equivalents held in Omnibus Accounts with our Subcustodians may (or may not) generate interest earnings in MBI's Subcustodial accounts. Except as otherwise provided in this Agreement, all interest earned on any Fiat Currencies held by Custodian on behalf of Client shall be payable to Custodian as consideration for the custody services provided to such Client.

### 6.4. Additional Custody Account Features

Initial Balance	The minimum balance required to open an account is \$500.00 USD, or its equivalent in other Fiat Currencies or Digital Assets.
Interest Rate	0.00%
Annual Percentage Yield	0.00%
Fees to MBI	MBI charges a management fee, as described in <u>Section 6.3</u> . Additional fees are detailed in MBI's Schedule of Fees.
Transaction Limitations	The transaction limitations for your Accounts are set forth in Section 6.2.
Additional Fee Disclosure	As noted above, you are not responsible for paying any fees to MBI for opening and maintaining this Account, although we may deduct certain interest earnings in consideration for our custodial services.

### 6.5. Not FDIC Insured

Fiat Currencies placed with MBI are **NOT INSURED** by the Federal Deposit Insurance Corporation nor by any government-sponsored or non-government sponsored insurance scheme or product in the United States or in Puerto Rico.

## 7. **TRANSFER SERVICES**

You may direct certain transfers of funds to and from your Custody Account, as described in this Section 7, subject to the limitations in Section 7. From time to time, without prior notice, MBI may add or eliminate its transfer Services, or otherwise modify the terms or features of any of its Services.

In addition to its Custody Account services, MBI currently offers the following transfer Services:

#### a. Wire Transfer Services

For transfer transactions, your request will be completed only if you have sufficient funds in the account from which you wish to transfer funds and, in the case of like-titled accounts, the accounts are linked for transfer capabilities. Dollar limitations may be set according to the account type and/or the type of online transfer service you are utilizing to transfer funds. These limitations are set for security reasons and may not be disclosed for that reason. Transfers may be delayed based on the time of transaction



and the type of transfer service you are utilizing to process the transfer. Certain types of transfers are subject to additional terms and conditions set forth below.

#### 7.1. Funding Your Account

You can fund your Account with MBI by linking an External Account and initiating a transfer. MBI accepts Society for Worldwide Interbank Telecommunications Payments ("**SWIFT Payments**") and the Federal Reserve Wire Network ("**Fedwire**") transfers for Fiat Currencies. Transfers of Fiat Currencies will not be credited to a Custody Account until the transfer of such Fiat Currency to such Custody Account has been settled, as determined by MBI.

#### 7.2. Linking External Accounts; External Account Transfers

A Client may connect or link an External Client Account to its Account for the purposes of making transfers to, and withdrawals from, such Custody Account; provided, however, that no External Client Account will be connected or linked to a Client's MBI Account unless MBI, in its sole discretion, approves the External Client Account for use in connection with transfers to and from the Custody Account. MBI may rescind its approval of any External Client Account at any time. With respect to each transfer to and from the Custody Account, Client must designate an approved External Client Account as the source of the transfer into the Custody Account or the destination for the transfer out of it.

By utilizing this transfer service, you authorize MBI to initiate ACH debits and credits on your behalf, for your convenience, in any amount you authorize. MBI may impose limits on the amounts for risk management purposes which restrict these amounts on a daily, weekly, monthly or other periodic basis. MBI may terminate this service at any time for any reason.

To revoke this authorization, delete the linked account from your MBI Account and notify us of the revocation in writing. You agree that the revocation of authorization is not effective until MBI has opportunity to receive and act on the notification. In all cases, we will consider the revocation of authorization effective upon our receipt and confirmation in writing to you of said instructions.

#### Limitations on Transfers to External Accounts

*Right to require advance notice of withdrawals.* For all amounts held in Custody Accounts, MBI reserves the right to require at least seven (7) days' prior written notice of your intent to make a withdrawal. Although we usually process withdrawals without prior notice on our Custody Accounts, doing so does not mean that we give up that right to require prior written notice of seven (7) days' or more.

*Right to limit certain types of transfers.* MBI reserves the right to impose limits on the number of certain types of transfers you can make each month from your Custody Account. Although we typically do not limit the number of certain types of transfers you can make each month, we may decline to process more than six (6) electronic transfer requests from your Custody Account to an External Account in any one 30-day period. If you exceed the transfer limits on more than an occasional basis, we may close your Account, with or without prior notice to you.

*Unfunded Transfers.* MBI does not offer or provide overdraft services and, therefore, cannot process unfunded transfers. All transfer requests to an External Account exceeding your current Available Balance will be declined without liability to MBI.

*Limitation on Liability.* We may refuse to allow any transfers without creating liability to you if we have a concern that one or more transactions in your Account may have been unauthorized or fraudulent, if there is a dispute concerning the Account that makes us uncertain regarding the instructions that have been given, the account is garnished or attached, the Account has been pledged to MBI as collateral for a debt, the availability of the funds held at MBI cannot be verified, any required documentation has not been presented, or you have failed to repay an obligation to us on time.

## 8. FUNDS AVAILABILITY

Although MBI does not offer transaction accounts, it is generally our policy to follow U.S. federal guidelines for funds availability where applicable to our Service. As described above, the only method of funds transfer accepted by MBI for its Custody Accounts at this time is wire transfer via SWIFT or Fedwire.

### 8.1. When Are Funds Available?

For determining the availability of your funds, every day is a “**business day**,” except Saturdays, Sundays, and federal holidays. If you make a deposit before 3:45 PM EST on a business day that we are open, we will consider that day to be the day of your deposit. However, if you make a deposit after 3:45 PM EST or on a day we are not open, we will consider that the deposit was made on the next business day we are open.

#### *Wire Transfers*

Funds from the following transfers to established Custody Accounts are available on the first business day after the day of your transfer:

- Wire Transfers

### 8.2. Processing Transactions

Posting transactions to your Account impacts your Account balance. Posting a credit increases your balance. Posting a debit or hold reduces your balance. Transfers into your Custody Accounts will credit your Account. Transfers out of your Custody Account will debit it. Your Account may also be debited for the payment of fees, including fees owed to MBI for its Services.

It is generally not the policy of MBI to process more than one transaction in your Account in a single day. To the extent MBI deviates from this policy, you agree that we may in our discretion determine our posting orders for the transactions, as well as the order in which we post debits and credits to your Account.

## 9. INSUFFICIENT FUNDS AND OVERDRAFT PROTECTION

We do not authorize overdrafts on your Account under any circumstances or extend credit on your behalf to cover them. All transfer requests must be fully funded by your Available Balance.

## 10. FEES & SET-OFF

Your Account is subject to the fees described in this Agreement and detailed in the Schedule of Fees, which is available at <http://www.mercantile-bank.com>. The Schedule of Fees that applies to your Account is a binding part of this Agreement. By entering this Agreement and becoming a Client, you agree to pay any fees listed in MBI’s Fee Schedule, as updated from time to time by MBI in its sole discretion and published to its website or communicated to you by Electronic Means. Client agrees to pay Account fees in a timely manner, and hereby authorizes and directs Custodian to direct a deduction from the Custodial Account in an amount equal to the value of the then-outstanding amount owed to MBI. If there are not enough funds in your account to cover the amounts you owe us, we may deduct up to the full remaining amount and close your Account, without being liable to you. If you or any of your Affiliates owe money to MBI, or to any Affiliate of MBI (including Affiliates that provide services to MBI), we reserve the right to deduct all amounts owed by you or your Affiliate from any Account you control with us. If you believe the amounts withheld from any of your Accounts are in error, you agree that your exclusive remedy is to seek arbitration of your dispute pursuant to the dispute resolution provisions contained in Section 11.8 of this Agreement.

## 11. OTHER TERMS AND CONDITIONS

### 11.1. Additional Definitions That Apply to This Section

“**Arbitration**” has the meaning given to such term in Section 11.8.

“**Arbitrator**” has the meaning given to such term in Section 11.8.

“**BSA/AML Requirements**” has the meaning given to such term in Section 11.2.

**"Consequential Damages"** means (i) consequential, incidental, punitive, exemplary damages, (ii) any loss of revenue and of loss of profit, including any loss arising from use of the Services, and (iii) any similar type of damages or losses.

**"Dispute"** means any disagreement between the Parties regarding, related to, or arising from this Agreement (including any disagreement regarding (i) any act or omission by a Party, or (ii) the interpretation or enforceability of any provision of this Agreement.

**"FinCEN"** means the Financial Crimes Enforcement Network.

**"Force Majeure Event"** means any event, condition or circumstance beyond the reasonable control of MBI, including circumstances caused, directly or indirectly, by: acts of God; wars; hurricanes, earthquakes; fires; floods; any disruption or failure of any utility; civil disturbances; pandemics; any disruption or failure of any technology; any failure or disruption of any service or service provider; or any changes in applicable Laws.

**"Governmental Authority"** means any federal, state, local or foreign governmental authority; a state, province, commonwealth, territory or district thereof; a county or parish; a city, town, township, village or other municipality; a district, ward or other subdivision of any of the foregoing; any executive, legislative or other governing body of any of the foregoing; any agency, authority, board, department, system, service, office, commission, committee, council or other administrative body of any of the foregoing; any court or other judicial body; and any officer, official or other representative of any of the foregoing.

**"Losses"** means any and all damages, fines, fees, penalties, deficiencies, liabilities, claims, losses, damages demands, judgments, settlements, obligations, costs and expenses (whether actual, special, consequential, or punitive), including interest, court costs and fees, costs of attorneys, accountants and other experts, and other expenses of litigation or other proceedings or of any claim, default or assessment.

**"OCIF"** means the Office of the Commissioner of Financial Institutions for Puerto Rico.

**"OFAC"** means the Office of Foreign Assets Control of the United States Department of the Treasury.

**"MBI Intellectual Property"** means all of the MBI Software Assets, MBI Proprietary Interests and MBI General Know-How.

**"MBI Proprietary Interests"** means all patents, copyrights, trade secrets and trademarks, whether issued or pending, and other intellectual property rights of MBI.

**"MBI Software"** means all software owned by or licensed to MBI.

**"MBI Software Assets"** means (a) the MBI Software, (b) all documents used in the design, development, operation, maintenance or installation of the MBI Software, or principally describing any MBI Software or its use, and (c) all copies of MBI Software.

## 11.2. BSA/AML/OFAC Requirements

MBI is subject to the U.S. Bank Secrecy Act, as amended by the USA Patriot Act of 2001, and its implementing regulations, as administered by FinCEN, as well as the anti-money laundering laws and regulations administered by OCIF (collectively, MBI's **"BSA/AML Requirements"**). In addition, MBI must comply with the regulations issued by OFAC (**"OFAC Requirements"**). In order to ensure that MBI provides safe and reputable Services in full compliance with its BSA/AML Requirements and OFAC Requirements, it is MBI's policy to monitor for suspicious transactions and comply with mandatory reporting of suspicious transactions to appropriate regulators in addition to collecting information at about its prospective clients during the application process.

During the application process and at all times thereafter, Clients are required to provide MBI with all information that MBI determines, in its sole discretion, is necessary to meet its obligations under its BSA/AML Requirements and OFAC Requirements. MBI reserves the right to refuse opening an Account to, or to bar transactions from or to, or terminate any relationship with, any Client for any reason (or for no reason) at any time. MBI shall have the right to suspend Client's Account and the Services where it concludes that doing so is needed to comply with its responsibilities under the BSA/AML Requirements and OFAC Requirements. Client agrees to excuse MBI from performance of its obligations relating to Client or the Custody

Account under the Client Agreement and this Agreement if MBI reasonably determines that performance might cause it to violate its obligations under the BSA/AML Requirements and OFAC Requirements.

Client acknowledges that it may be required to forfeit any and all Client Assets in its Accounts to the appropriate authorities. As part of the BSA/AML Requirements and OFAC Requirements, MBI is required to obtain, verify, and record information that identifies each Client (and the related User(s)) who opens an Account. Each new Client (and related Authorized Persons) shall be required to provide their name, physical address, mailing address, date of birth, and other information to MBI. Furthermore, MBI may require each Client (and related Authorized Persons) to provide additional information to MBI or undergo a background check prior to being authorized to open a Client Account and access the Services or at any point thereafter in accordance with applicable Laws. MBI hereby expressly reserves the right to keep and share such information and documentation with its regulators and law enforcement, even when the Account relationship is terminated or the application to open an Account has not been completed.

### 11.3. Suspension of Services

In the event of any Force Majeure Event or any other event that would make providing any Service to Clients commercially unreasonable for MBI, MBI may, in its sole discretion and without any liability to any Client, with or without notice, suspend or limit any or all of the Services provided to Clients.

In the event that any Client breaches any terms of this Agreement, MBI may, in its sole discretion and without any liability to such Client, with or without notice, suspend or limit any or all of the Services provided to such Client.

### 11.4. Investigations, Governmental Authorities and Legal Proceedings

MBI may initiate and carry out an investigation into any matter related to this Agreement or the use of any Service.

MBI may disclose any information and documents received by MBI regarding any Client, its Custody Account and its use of Services to any Governmental Authority (i) to the extent required by applicable Laws, and (ii) in connection with any investigation, request, inquiry or proceedings by such Governmental Authority.

MBI will strictly comply with any order or writ of attachment issued by any Governmental Authority (including the Treasury Department and the Internal Revenue Service). As a result, MBI could among other things be obligated to (i) freeze access to Client Assets, or (ii) deliver Client Assets to a Governmental Authority or other Person. Regardless of the terms of such attachment, garnishment, levy or other state or federal process, we have first claim to all funds in your Account. To the extent not prohibited by applicable Laws, MBI will provide a Client with prompt written notice of any order or writ of attachment or other legal process affecting any Client Assets of such Client.

MBI will be under no obligation to contest, challenge, or question the terms of such order or writ, or to raise any defense that a Client may have against the Person seeking any order or writ against any Client Assets of such Client. We may take action to comply with such legal process as we determine to be appropriate in the circumstances without liability to you, even if the legal process purports to affect the interest of only one owner of a joint account and even if any funds we may be required to pay out leaves insufficient funds to pay a transaction you have authorized. If we incur any expenses, including without limitation, reasonable attorney fees, in connection with any such legal process, we may charge any expenses and fees to your Account or any other Account you may have with us without prior notice to you, or we may bill you directly for such expenses and fees. Any garnishment or other levy against your account is subject to our right of setoff and security interest. MBI will only be obligated to release affected Client Assets when it has been served with an order that such Client Assets may be released. Presentment to MBI of any other evidence will not be sufficient for MBI to release any affected Client Assets.

If any Client Assets of any Client become subject to any actual or potential legal proceeding, MBI may refuse to honor any instructions from such Client with respect to such Client Assets until such proceeding has been resolved. MBI will not be liable to Client for amounts paid pursuant to any order, attachment, or notice of levy in any circumstances.

### 11.5 Setoff and Security Interest Rights

You hereby grant to MBI as agent and representative of its Affiliates, a security interest in all of your Accounts and all of the Custodial Funds, investment property, financial assets, securities, instruments, general intangibles, or cash and other funds that may be deposited and held in such Accounts whether now existing or hereafter arising or deposited therein in the future together



with all proceeds thereof as security for obligations now or in the future owing to MBI or its Affiliates by you or your Affiliates. These obligations include both secured and unsecured debts. We may take or set off funds in any or all of your Accounts with us for direct, indirect and acquired obligations that you or your Affiliates owe us or our Affiliates. These rights are in addition to other rights we have to take or charge funds in your Account for obligations you or your Affiliates owe us or our Affiliates. You and your Affiliates and MBI hereby agree that each item of property (whether investment property, financial asset, security, instrument, general intangible, Custodial Funds or cash) credited to an Account shall be treated as a "financial asset" within the meaning of Section 8-102(a)(9) of the Uniform Commercial Code as in effect in the State of New York from time to time (the "UCC"). MBI hereby represents and warrants and agrees that it is and will at all times be acting as a "securities intermediary" within the meaning of Section 8-102(a)(14) of the UCC and that each Account is a "securities account" within the meaning of Section 8-501 of the UCC. As used herein, the terms "Financial Asset," "Investment Property," "Proceeds," and "Security Entitlement" shall have the meanings set forth in Article 8 and 9 of the UCC. You for yourself and on behalf of your Affiliates agree that MBI as secured party for itself and its Affiliates may issue entitlement orders to MBI as securities intermediary with respect to an Account and the financial assets credited thereto and that MBI is authorized to act on such entitlement orders without your consent or the consent of your Affiliates upon the failure of you or your Affiliates to make timely payment of any obligations owed by you or your Affiliates to MBI or its Affiliates. MBI as agent and representative of its Affiliates and as secured party is entitled to exercise all remedies available under the UCC.

If the law restricts our ability to take or set off funds in your Account or the Account of your Affiliates, or if some government payments are protected from attachment, levy or legal process, to the extent that you may do so by contract, you waive those conditions and limits and authorize us to apply funds in any or all of your Accounts with us or our Affiliates to obligations you or your Affiliates owe us or our Affiliates.

Exercising these rights may result in early withdrawal penalties or may cause us to dishonor items should our action result in non-sufficient funds in your Account.

In the case of a joint account, Business Account with joint owners/authorized users we may exercise these rights against the Account and all owners. These rights exist no matter who contributed funds to the joint account. Similarly, each joint owner agrees that we may use the money in their individual accounts to satisfy obligations in their joint accounts.

#### 11.6. Limits on Liability

(a) MBI DISCLAIMS ANY AND ALL WARRANTIES AND REPRESENTATIONS, EXPRESS OR IMPLIED, REGARDING ANY SERVICE, OR TECHNOLOGY, OR THE RESULTS OBTAINED BY USE OF ANY SERVICE OR TECHNOLOGY, INCLUDING ANY WARRANTIES OF MERCHANTABILITY OR FITNESS FOR A PARTICULAR PURPOSE. CLIENT EXPRESSLY ACKNOWLEDGES AND AGREES THAT (I) ALL OF THE SERVICES AND TECHNOLOGIES ARE PROVIDED ON AN "AS IS" BASIS AND (II) MBI DOES NOT GUARANTEE THE ADEQUACY, ACCURACY, TIMELINESS OR COMPLETENESS OF ANY RESULTS OBTAINED BY OR THROUGH THE USE OF ANY SERVICE OR TECHNOLOGY.

(b) MBI DOES NOT MAKE ANY REPRESENTATION OR WARRANTY (A) THAT THE AVAILABILITY OR USE OF ANY SERVICE OR TECHNOLOGY WILL BE UNINTERRUPTED, ERROR FREE OR SECURE; (B) REGARDING ANY TECHNOLOGY OR SERVICE PROVIDED BY ANY THIRD PARTY, INCLUDING SJMX; OR (C) REGARDING THE QUALITY, ACCURACY OR COMPLETENESS OF ANY DATA OR TECHNOLOGY.

(c) INFORMATION STORED OR TRANSFERRED BY CLIENT IN CONNECTION WITH USE OF ANY SERVICE MAY BECOME IRRETRIEVABLY LOST OR CORRUPTED OR TEMPORARILY UNAVAILABLE DUE TO A VARIETY OF CAUSES, INCLUDING VIRUSES OR OTHER DESTRUCTIVE CODE, SOFTWARE FAILURES, PROTOCOL CHANGES BY THIRD PARTY PROVIDERS, INTERNET OUTAGES, A FORCE MAJEURE EVENT OR OTHER DISASTERS, SCHEDULED OR UNSCHEDULED MAINTENANCE, OR OTHER CAUSES, EITHER WITHIN OR OUTSIDE OF MBI'S CONTROL. CLIENT IS SOLELY RESPONSIBLE FOR BACKING UP AND MAINTAINING DUPLICATE COPIES OF ANY INFORMATION CLIENT STORES OR TRANSFERS THROUGH THE SERVICE.

(d) Under no circumstances shall MBI be liable for any Consequential Damages incurred or suffered by Client in connection with, or arising from, this Agreement or any use of the Services.

(e) MBI shall have no liability for any Losses arising from (i) any Force Majeure Event, (ii) any error or failure related to, or arising from, any technology, (iii) any service provided by any Third Party, or (iv) any action or omission by any Third Party. With respect to any Losses incurred by a Client as a result of the acts or the failure to act by any Third Party, MBI shall take such action as it deems appropriate after consulting with Client to recover such Losses from such Third Party; provided, however, that (x) MBI shall not be obligated to incur any costs to recover such Losses unless Client has agreed to reimburse MBI for such

costs on terms acceptable to MBI, and (y) MBI's sole responsibility and liability to Client shall be limited to amounts received from such Third Party for Client (excluding costs and expenses incurred by MBI).

(f) MBI shall have no liability for any act or omission other than liabilities arising from its fraud, gross negligence or willful misconduct.

(g) No Person (other than the Parties) shall have any liability or obligation under this Agreement, and neither Party shall allege or assert any claim regarding this Agreement or the Services against any Person (other than the other Party).

(h). Notwithstanding anything to the contrary in this Agreement, MBI's liability to Client for any and all claims made by Client against MBI regarding this Agreement, the Terms of Service and use of the Services shall be limited to the total amount of Fees (exclusive of interest generated or earned from Cash and Cash Equivalents held in Omnibus Accounts with our Subcustodians in MBI's Subcustodial accounts) paid by Client to MBI during the six (6) months preceding the first date on which any claim is asserted against the other party. These limitations apply to all causes of action in the aggregate, including, but not by way of limitation, breach of contract, breach of warranty, negligence, strict liability and other torts. You and your Affiliates waive, to the fullest extent of the law, all speculative, consequential and punitive damages whether incurred directly or indirectly.

#### 11.7 Client Responsibilities, Representations and Warranties

(a) Client will comply in all material respects with (i) the terms of this Agreement, (ii) the instructions given by MBI to Client regarding its Account and the Services, and (iii) the Laws applicable to Client regarding its Account and its use of Services.

(b) Client shall promptly provide MBI with such information and documents as may be requested by MBI regarding Client and its use of the Services to the extent deemed necessary or appropriate by MBI to determine whether or not Client is in compliance with this Agreement and all Laws applicable to Client regarding its Account and its use of Services, all of which shall be provided in such manner or format as may be reasonably requested by MBI.

(c) Client shall promptly provide MBI with written notice of any breach of this Agreement by Client or any event, circumstance or development that could reasonably be expected to result in any breach of this Agreement.

(e) Client will not use, or permit the use of, any of the Services in any manner that would (i) violate any applicable Laws, (ii) breach any contract, intellectual property right or other Third Party right to which it is a party or subject, (iii) adversely affect or interfere with the ability of MBI to provide any Service to any of its clients, (iv) create Accounts or access data (including Client or other client information) through unauthorized means, or (v) breach any of the terms of this Agreement.

(f) Client represents and warrants that: (i) it has full power and authority to execute, deliver, and perform this Agreement, (ii) if an entity, Client is duly organized and validly existing under the laws of the jurisdiction of its organization, (iii) Client has obtained all consents, authorizations, and approvals, and has made all filings and registrations and given all notices that it is required to obtain, make, or give in order to execute, deliver, and perform this Agreement, and (iv) the execution, delivery, and performance of this Agreement by Client does not breach any contract to which Client is a party nor violate any applicable Laws.

#### 11.8. Choice of Law and Dispute Resolution

(a) This Agreement and the Terms of Service shall be governed by, and construed in accordance with, the Laws of the State of New York, without regard to any conflict of law provisions. This Agreement shall be deemed to have been executed in San Juan, Puerto Rico.

(b) (i) Any Dispute among the Parties shall be determined by arbitration in San Juan, Puerto Rico (an "**Arbitration**"), which shall be administered by JAMS (or any like successor organization thereto) pursuant to its Comprehensive Arbitration Rules and Procedures and in accordance with the Expedited Procedures in those Rules or pursuant to JAMS' Streamlined Arbitration Rules and Procedures. The language used in any Arbitration shall be English.

(c) An Arbitration shall be presided over by one arbitrator (the "**Arbitrator**") who shall be mutually agreed to by the Parties. If the Parties are unable to agree upon an Arbitrator within thirty (30) days of the commencement of the Arbitration, then the Arbitrator shall be determined in accordance with the applicable rules and procedures of JAMS.

(d). The Arbitrator shall apply the Federal laws of the United States of America and the State laws of New York. Judgment on the award may be entered in any court having jurisdiction.

(e). This Section 11.8 shall not preclude the Parties from seeking provisional remedies in aid of arbitration from a court of appropriate jurisdiction. The Parties further understand and agree that the decision of the Arbitrator shall be final and binding to the fullest extent permitted by law and enforceable by any court having jurisdiction thereof.

(f). The Parties shall maintain the confidential nature of any Arbitration proceeding and the award, if any, including the privacy of the hearing, except as may be necessary to prepare for or conduct the arbitration hearing on the merits, or except as may be necessary in connection with a court application for a preliminary remedy, a judicial challenge to an award or its enforcement, or unless otherwise required by law or judicial decision.

(g) The prevailing party in any Dispute shall be entitled to be reimbursed for all reasonably costs incurred by such party in such Dispute by the non-prevailing party.

**THE REMEDIES AVAILABLE TO THE PARTIES PURSUANT TO SECTIONS 11.5 & 11.7 SHALL BE THE SOLE AND EXCLUSIVE REMEDIES AVAILABLE TO THE PARTIES WITH RESPECT TO ANY DISPUTE ARISING OUT OF OR RELATING TO THIS AGREEMENT.**

**11.9. Unreturned or Abandoned Property**

If for any reason MBI is unable to return any Client Assets to a Client's designated External Client Account, then MBI will report and remit such Client Assets in accordance with applicable unclaimed property laws, including the laws of Puerto Rico, if applicable.

**11.10. Taxes**

Each Client is solely responsible for determining what, if any, taxes apply to transactions processed by such Client through the Services, and it is each Client's responsibility to report and remit the correct tax to the appropriate tax authority. MBI will not be responsible for determining whether taxes apply to any Client's transactions or for collecting, reporting, withholding or remitting any taxes arising from any transactions.

Any failure by Client to satisfy its tax obligations that result in Losses to MBI, including legal expense relating to potential subpoenas by taxing authorities, shall be promptly reimbursed by Client upon request by MBI.

**11.11. Miscellaneous**

(a) *Entire Agreement.* This Agreement and the Terms of Service (i) contains the entire agreement among the Parties with respect to the subject matter hereof, and (ii) supersedes all prior agreements and arrangements (oral and written) among the Parties with respect to the subject matter hereof.

(b) *Amendment.* This Agreement may only be amended, modified, or supplemented pursuant to an agreement in writing that has been executed and delivered by both Parties. MBI may amend, supplement or modify the Terms of Service at any time without any consent upon giving Client written notice of such amendment, supplement or modification.

(c) *Waiver.* No Party shall be deemed to have waived any of its rights under this Agreement unless such waiver is pursuant to an agreement that has been executed and delivered by such Party, and such waiver shall be limited to the terms of such agreement. No waiver of any provision of this Agreement by any Party shall be deemed a waiver of (i) such provision in the future, or (ii) any other matter by such Party.

(d) *Severability.* The invalidity and unenforceability of any provision of this Agreement in any jurisdiction shall not affect the interpretation of (i) the other provisions of this Agreement in such jurisdiction, and this Agreement shall be construed in all respects as if such invalid or unenforceable provision were omitted, and (ii) this Agreement in any other jurisdiction. Notwithstanding the foregoing, if any provision of this Agreement is determined to be unenforceable, this Agreement shall be interpreted in a manner consistent with such provision to the fullest extent permitted by applicable Laws.

(e) *Assignment*. Client may not assign or transfer any of its rights or obligations under this Agreement without prior written consent from MBI, including by operation of law or in connection with any change of control. MBI may assign or transfer any or all of its rights under this Agreement, in whole or in part, upon providing Client prior written notice.

(f) *Intellectual Property*. MBI or its third-party licensors are and shall be the owners of the MBI Intellectual Property and Clients shall not have any ownership rights, express or implied, in the MBI Intellectual Property.

(g) *Interpretation*. Except as otherwise provided in this Agreement or the Terms of Service, this Agreement will be subject to the following clauses of interpretation: (i) the gender (or lack of gender) of all words used includes the masculine, feminine, and neuter; (ii) the meanings of all words used shall be applicable equally to the singular or plural, as applicable; (iii) the words "include" and "including" shall be without limitation; (iv) the words "based on" shall mean based on, related to, or derived from, (v) references to Sections, Annexes and Schedules refer to the Sections, Annexes and Schedules of this Agreement or the Term of Service, as applicable; (vi) references to laws refer to such laws as they may be amended from time to time, and references to particular provisions of a laws include any corresponding provisions of any succeeding laws; (vii) references to any agreement refers to such agreement as it may be amended, modified, supplemented, or replaced (including by any consent or waiver) from time to time, (viii) all headings and captions contained in this Agreement are inserted for convenience of reference only and shall not be deemed to interpret or modify the provisions of this Agreement; (ix) references to money refer to legal currency of the United States of America unless otherwise stated; and, (x) any acts or omissions of MBI pursuant to, or in connection with, this Agreement or the Terms of Service, shall be in the sole and absolute discretion of MBI.

(h) *Counterparts*. This Agreement may be executed in counterparts (including by electronic signature), each of which shall constitute an original and all of which, when taken together, shall constitute one agreement.

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Attachment	Description of Annex	Title/Relevant Citation/Page Number
Attachment A	Government response to the Motion for Return of Property (7 Dec 2023)	(ECF 188) - Case 1:23-cr-00118-AT Document 188  Page 1 and Page 2
Attachment B	Letter in reply to the trustee objections to the motion for the return of property – Brad Geyar.	n/a
Attachment C	The Debtors Motion for relief from order Appointing Luc Despins.	(DOC 561 ) - Case 22-50073 (JAM) Doc 561
Attachment D	Bankruptcy Trustee’s lawyer (Paul Hastings letter) filed on behalf of Luc Despins on 8 Dec 2023	(ECF 189) - Case 1:23-cr-00118-AT
Attachment E	Luc Despins/ Paul Hastings fees and Expenses.	Case 22-50073 Doc 2256 Pg 3 Onwards
Attachment E1	Transcript (highlighted) August 29, 2023	(ECF 151-3) Case 1:23-cr-00118-AT
Attachment F	Governments Forfeiture Bill of Particulars	(ECF 38) - Case 1:23-cr-00118-AT Document 38
Attachment G	Letter from Candey’s Solicitors  December 12, 2023	
Attachment G1	Transcript June 29, 2023	Case 22-50073 Doc 1985
Attachment H	Bankruptcy counsel representing Chapter 11 trustee Luc Despins	(ECF 2425) - Case 22-50073 Doc 2425
Attachment I	Transcript August 29, 2023	(ECF 2174) - Case 22-50073 Doc 2174  Pages 24- 29
Attachment J	Aramino Audit December 20, 2021	
Attachment K	Aramino Audit August 10, 2022	



## Business Account Application

### Business Legal Name

Himalaya International Reserves Ltd

### Authorized person completing this application

Georgette Adonis-Roberts

### As the person completing this application, I am a

Employee/Executive

**Please upload the Corporate Resolution of the company authorizing you to open and manage an account for the entity.**

### Business Address

Commerce House, Cay 1, Tortola, Tortola VG1110, Virgin Islands (British)

### Email of the authorized person completing the application

Georgette.Adonis-Roberts@Hamilton-CH.com

### Phone

07464803316

### Business Registration Number

2047670

### Business Tax ID (EIN for USA Entity)

n/a

### Date Company registered

11/9/2020

### Country of business registration

Virgin Islands (British)

## About your business

### Please describe your business and who your customers are.

The Himalaya Dollar (HDO) is an Ethereum-based ERC-1404 token that has backward compatibility to the ERC-20. Our stable coin fixed to the United States Dollar (USD) with the backing of a Reserve consisting of USD and cash-equivalent assets.

### What is the purpose of opening a bank account with FV Bank? Please describe how you will use the account.

To hold the proceeds of the sale of our Himalaya Dollar.

### Has the Applicant, its owners or principals, been subject to any regulatory investigation, penalty or enforcement in the last 5 years?

No

### Is your business involved in any of the following (check all that apply)

### Does your business have a written business plan?

No

## Expected Account Activity

**Expected amount of initial deposit**  
\$300,000,000.00

**Expected average balance**  
\$500,000,000.00

**Expected number of monthly ACH deposits**  
0

**Expected amount of monthly ACH deposits**  
\$0.00

**Expected number of monthly ACH payments**  
0

**Expected amount of monthly ACH payments**  
\$0.00

**Expected number of monthly Domestic Wire deposits**  
0

**Expected amount of monthly Domestic Wire deposits**  
\$0.00

**Expected number of monthly Domestic Wire payments**  
3

**Expected amount of monthly Domestic Wire payments**  
\$100,000,000.00

**Expected number of monthly International Wire deposits**  
3

**Expected amount of monthly International Wire deposits**  
\$1,000,000.00

**Expected number of monthly International Wire payments**  
3

**Expected amount of monthly International Wire payments**  
\$20,000,000.00

**Entity Type**  
Limited Liability Company

**Website**  
<https://himalaya.exchange/>

**Please provide any "Doing Business As " names you also operate under if any.**  
Himalaya Dollar

Please provide the name and valid identification (passport) for an individual in your organization who has significant responsibility to control, manage or direct the company? This may include an executive officer or senior manager such as a Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, President, or any other individual who regularly performs similar functions.

**Name**  
Kin Ming Je

**Role**  
President

**Controller Identity Document**  
WJ passport.pdf

How many other officers are in your organization, not including the above, such as Chief Executive Officer, Chief Financial Officer and/or Chief Operating Officer that exert control over the business? If so, please list their names. below.

**Number of additional Officers**  
1

**Name**  
Ehsan Masud

**Role**  
President

**Who are your shareholders or members who control 25% or more of the entity?**

Entities

**How many entity shareholders with 25% or more ownership?**

1

**Name of entity shareholder #1**  
Major Leaad International Limited

**Please list all shareholders who own 25% or more of the entity**

**Percentage of ownership of entity #1**  
100.00%

**How many directors does your company have?**

2

**Director #1**  
Jesse Brown

**Please upload a valid govenment issued photo ID of the Director #1**  
Jesse-Passport.pdf

**Director #2**  
Hee-Seup Shin

**Please upload a valid govenment issued photo ID of the Director #2**  
Hee-Seup Shin Passport (1).pdf

**Please upload your certificate of incorporation or equivalent**  
Cert of Incorporation - HIR.pdf

**Please upload your articles of association or operating agreement.**  
HIR M&A 908995 - 09 Nov 2020(1).pdf

**Please upload a register of shareholders, members or partners.**  
HIR Members Register REG 908997 - 18 Nov 2020.pdf

**Please upload a proof of address for the business. (Utility bill, rental contract, bank statement or similiar)**

**Please upload a source of funds, like a bank statement, trading account, invoice or contract.**

**Does Your Company deal in crypto currency?**  
Yes

**Is your company a Money Servcies Business or Money Transmitter?**  
No

**Do you require a license to operate your business model in your jurisdiction of registration?**  
No



**What type of crypto currency does your organization work with?**

Other

**Please list other cryptocurrencies offered since you selected "Other" above.**

HDO and HCN

**What is your business model in the crypto/blockchain industry?**

Other

**Please explain your crypto business model if you selected "Other" above.**

The Himalaya Dollar (HDO) is an Ethereum-based ERC-1404 token that has backward compatibility to the ERC-20. Our stable coin fixed to the United States Dollar (USD) with the backing of a Reserve consisting of USD and cash-equivalent assets.

**Who are your primary business partners involved in the crypto currency transactions (liquidity providers, OTC, Exchanges etc.)?**

Himalaya Exchange

**Does your organization have an AML/CFT Program (Policies and Procedures)?**

Yes

**Please upload your AML/CFT Program (policies and procedures).**

AML Policy\_V3.0.pdf

**Has your organization AML/CFT Compliance Program been reviewed by an independent third party?**

No

**Does your organization have a Complaints policy?**

No

**Please upload your complaints policy.**

**Does your organization have a business agreement or terms and conditions with your customer?**

Yes

**Please upload your business agreement or terms and conditions.**

Himalaya Exchange Terms & Conditions (16) New- 17.11.2021.pdf

**Do your customers have direct access to their wallet or account with your service?**

No

#### **IMPORTANT INFORMATION ABOUT PROCEDURES FOR OPENING AN ACCOUNT:**

To help the government fight the funding of terrorism and money laundering activities, federal law requires all financial institutions to obtain, verify, and record information that identifies each person who opens an account. What this means for you: When you open an account, we will ask for your company formation documents, business licenses, business address, tax identification number, and other information that will allow us to identify your business. We may ask to see your other identifying or ownership documents.

#### **Acknowledgement of Receipt**

I hereby acknowledge receipt of this Business Customer Identification Program Notice and further acknowledge that I understand its contents.

**Acknowledgement and Agreement**

I hereby acknowledge the information provided in this application is true and accurate as of the date set forth opposite my signature below. I consent to the use of information contained herein for the sole purpose of verifying the identity of my business and preventing fraud and understand that this information will not be used or shared for any other purpose with any other party. I further represent that I am an authorized representative of the business.

**Regulation GG – Unlawful Internet Gambling Disclosure**

I hereby acknowledge receipt of FV Bank International Inc's Regulation GG Unlawful Internet Gambling Disclosure. By signing below, I certify that I am not now engaged in, and during the life of the Account, shall not engage in any activity or business that is unlawful under the Unlawful Internet Gambling Enforcement Act of 2006, 31 USC 5361, et seq., (the "UIGEA"). I understand that I may not use this Account or any other service to receive any funds, transfer, credit, instrument, or proceeds that arise from a business that is unlawful under the UIGEA. I agree that if I am asked to process a transaction that I believe is restricted under the UIGEA, I am block the transaction and take any other action deemed to be reasonable under the UIGEA.

**Marijuana Related Business Disclosure**

I hereby acknowledge receipt of FV Bank International Inc's Marijuana Related Business Disclosure.

By signing below, I certify that I am not now engage in, and during the life of the Account, will not conduct any marijuana related business activity, as outlined in the Marijuana Related Business Disclosure. Failing to alert FV Bank International Inc. that a Beneficial Owner(s) own or directly control a marijuana related business or are utilizing FV Bank International, Inc. to receive, accept, hold or maintain funds derived from a directly marijuana-related business are grounds for immediate termination of all banking services.

**Signature**

A handwritten signature in black ink, appearing to read 'Georgette Adonis-Roberts', with a long horizontal line extending to the right.

**Name of Signer**

Georgette Adonis-Roberts

**Date of Application**

11/17/2021