

**BitMart Institutional Account**

**Anti-Money Laundering Questionnaire**

**Application Date**:

**Entity Name:**

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

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| Question | | Yes | No | Note (if any) |
| General AML/KYC Policy | | | | |
| 1 | Does your company have a AML/KYC policy? | Y | N |  |
| 2 | Is the AML/KYC policy approved by the company’s board or a senior committee? |  |  |  |
| 3 | Does the company have a designated officer that is responsible for coordinating and overseeing the AML/KYC framework? |  |  |  |
| 4 | Has the company developed written policies documenting the processes have in place to prevent, detect and report suspicious transactions? |  |  |  |
| 5 | In addition to inspections by the government  supervisors/regulators, is the company’s AML/KYC policy reviewed by auditors or independent third parties on a regular basis? |  |  |  |
| 6 | Does the company have a policy prohibiting accounts/relationships with shell banks? (A shell bank is defined as a bank incorporated in a jurisdiction in which it has no physical presence and which is unaffiliated with a regulated financial group.) |  |  |  |
| 7 | Does the company have policies covering relationships with Politically Exposed Persons (PEP’s), their family and close associates? |  |  |  |
| 8 | Does the company have record retention procedures that comply with applicable law? |  |  |  |
| Risk Assessment | | | | |
| 9 | Does the company have a risk-based assessment of its customer base and their transactions? |  |  |  |
| 10 | Does the company determine the appropriate level of enhanced due diligence necessary for those categories of customers and transactions that the company has reason to believe pose a heightened risk of illicit activities at or through the company? |  |  |  |
| Know Your Customer | | | | |
| 11 | Has the company implemented processes for the identification of customers on whose behalf it maintains or operates accounts or conducts transactions? |  |  |  |
| 12 | Does the company have a requirement to collect information regarding its customers’ business activities? |  |  |  |
| 13 | Does the company have a process to review and, where appropriate, update customer information relating to high-risk client information? |  |  |  |
| 14 | Does the company have procedures to establish a record for each new customer noting their respective identification documents and ‘Know Your Customer’ information? |  |  |  |
| 15 | Does the company complete a risk-based assessment to understand the normal and expected transactions of its customers? |  |  |  |
| Reportable Transactions and Prevention and  Detection of Transactions with Illegally Obtained Funds | | | | |
|  | | | | |
| 16 | Does the company have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities? |  |  |  |
| 17 | Does the company screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities? For example, the SDN lists of OFAC, U.S. |  |  |  |
| 18 | Does the company have a monitoring program for unusual and potentially suspicious activities that cover funds transfers and monetary instruments such as travelers checks, money orders, etc? |  |  |  |
| AML/KYC Training | | | | |
| 19 | Does the company provide AML/KYC trainings to relevant employees that include:  § Identification and reporting of transactions that must be reported to government authorities.  § Examples of different forms of money laundering involving the company’s products and services.  § Internal policies to prevent money laundering. |  |  |  |
| 20 | Does the company have record retention procedures for such training and training records? |  |  |  |

**Certification**: I hereby certify that all information provided above are true and correct to the best of my knowledge. I understand and agree that BitMart has the sole discretion to determine whether to open the corporate account, which will be subject to BitMart’s Terms of Use, Privacy Policy, AML/KYC Policy and additional covenants, which may be updated and modified from time to time at the sole discretion of BitMart.

Name:

Title:

Signature