

Due Diligence Questionnaire

I. Entity & Ownership

1	Full Legal Name?	MEROS EQUITY GLOBAL MANAGEMENT s.r.o.
2	Append a list of branches which are covered by this questionnaire?	NO
3	Full Legal (Registered) Address?	Bílková 855/19 , Staré Město , 11000 , Praha 1
4	Full Primary Business Address (if different from above)?	
5	Date of Entity incorporation / establishment?	29.11.2017
6	Does the Entity, or any of its branches, operate under an Offshore Banking License (OBL)?	<input type="checkbox"/> Yes <input checked="" type="checkbox"/> No
A	If Yes, provide the name of the relevant branch/es which operate under an OBL	

2. Aml, Ctf & Sanctions Programme

1	Does the Entity have a programme that sets minimum AML, CTF and Sanctions standards regarding the following components?		
A	Appointed Officer with sufficient experience / expertise?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
B	Cash Reporting?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
C	CDD?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
D	EDD?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
E	Beneficial Ownership?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

F	Independent Testing?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
G	Periodic Review?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
H	Policies and Procedures?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
I	Risk Assessment?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
J	Sanctions?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
K	PEP Screening Adverse Information Screening?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
L	Suspicious Activity Reporting?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
M	Training and Education?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
N	Transaction Monitoring?	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

3. Abc, Aml, Ctf & Sanctions Regulation Policies and Procedures

1	Has the Entity documented policies and procedures consistent with applicable ABC regulations and requirements to [reasonably] prevent, detect and report bribery and corruption?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
2	Does the Entity's internal audit function or other independent third-party cover ABC Policies and Procedures?	<input type="checkbox"/> Yes	<input checked="" type="checkbox"/> No
3	Has the Entity documented policies and procedures consistent with applicable AML, CTF & Sanctions regulations and requirements to reasonably prevent, detect and report:		
A	Money laundering	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
B	Terrorist financing	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No
C	Sanction violation	<input checked="" type="checkbox"/> Yes	<input type="checkbox"/> No

4 Does the Entity have policies and procedures that?

A Prohibit the opening and keeping of anonymous and fictitious named accounts Yes No

B Prohibit the opening and keeping of accounts for unlicensed banks and / or NBFIs Yes No

C Prohibit dealing with other entities that provide banking services to unlicensed banks Yes No

D Prohibit accounts / relationships with shell banks Yes No

E Prohibit dealing with another Entity that provides services to shell banks Yes No

F Prohibit opening and keeping of accounts for any of unlicensed / unregulated remittance agents, exchanges houses, casa de Cambio, bureaux de change or money transfer agents Yes No

G Assess the risks of relationships with PEPs, including their family and close associates Yes No

5 Do the Entity's policies and procedures set out when CDD must be completed, e.g. at the time of onboarding or within 30 days Yes No

6 Which of the following does the Entity gather and retain when conducting CDD? Select all that apply

A Ownership structure Yes No

B Customer identification Yes No

C Expected activity Yes No

D Nature of business / employment Yes No

E Purpose and nature of relationship Yes No

F	Source of funds	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
G	Source of wealth	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
7	Are each of the following identified				
A	Ultimate beneficial ownership	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
I	Are ultimate beneficial owner verified?	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
B	Authorised signatories (where applicable)	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
C	Key controllers	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
D	Other relevant parties	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
8	Does the due diligence process result in customers receiving a risk classification	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
9	Does the Entity have a risk-based approach to screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
10	Does the Entity have policies, procedures and processes to review and escalate potential matches from screening customers and connected parties to determine whether they are PEPs, or controlled by PEPs	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
11	Does the Entity have a process to review and update customer information based on				
A	KYC renewal	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
B	Trigger event	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
12	Has the FI implemented processes for the identification of those customers on whose behalf it maintains or operates accounts or conducts transactions	<input checked="" type="checkbox"/>	Yes	<input type="checkbox"/>	No
13	Does the FI assess its FI customers' AML policies or practices	<input type="checkbox"/>	Yes	<input checked="" type="checkbox"/>	No

14 Does the FI have procedures to establish a record for each new customer noting their respective identification documents and 'Know Your Customer' information Yes No

15 Does the FI complete a risk-based assessment to understand the normal and expected transactions of its customers Yes No

4. Reportable Transactions and Prevention and Detection of Transactions with Illegally Obtained Funds

1 Does the FI have policies or practices for the identification and reporting of transactions that are required to be reported to the authorities Yes No

2 Where cash transaction reporting is mandatory, does the FI have procedures to identify transactions structured to avoid such obligations Yes No

3 Does the FI screen customers and transactions against lists of persons, entities or countries issued by government/competent authorities Yes No

5. Transaction Monitoring

1 Does the FI have a monitoring program for unusual and potentially suspicious activity that covers funds transfers and monetary instruments such as traveller's checks, money orders, etc Yes No

2 Does the FI have policies, procedures and processes to [reasonably] comply with and have controls in place to ensure compliance with

A FATF Recommendation 16 (Transparency) Yes No

B Local Regulations (including EU regulatory basis)
Specify the regulation Yes No

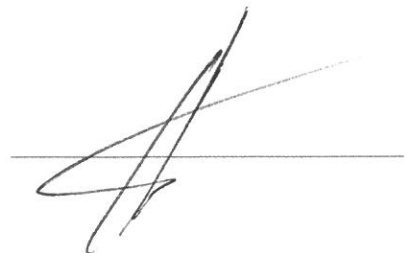
C If No, explain

Full Name ANDRII VYKHOREV

Date

17.05.21

Signature

A handwritten signature in black ink, consisting of several overlapping loops and a long horizontal stroke, positioned above a thin horizontal line.