

Enhanced Due Diligence ("EDD")(1) Questionnaire for Foreign Accounts

The EDD questionnaire is required to be completed by Registered Representatives seeking to establish a customer account(s), which is domiciled in a region of "high risk". The completed form and all supporting documentation must be submitted and approved by the AMLCO prior to account opening.

Client's Name: _____

Rep Name: _____

Country of Residence: _____

Rep Code: _____

1. How did you meet this client? (Please provide an explanation as to length of the relationship, how you were introduced and the name of the person who made the introduction if applicable, are they an expatriate? if so, of what country)

2. Client background (Please be specific, provide details from your client account application interview process)

a. Occupation:

--

b. How long have they been in that field?

--

c. If the prospective client is retired, please provide details of their prior employment.

--

d. Investment Experience - Provide number of years and previous specific type of investments.

--

e. Source of Funds (Bank reference, Investment account, business account; how will funds be remitted to the account – check, wire or ACAT transfer; Please be specific. If a foreign account, country from which funds will be sent, expected amount & frequency).

--

f. Will the client want to engage in receiving and sending third party transactions (wires, journals, securities)? If yes, please provide details.

--

(1) Section 352 of the USA Patriot Act

(2) PEP is an individual (i.e. individual account holder or ultimate beneficial owner, shareholder, director, partner and authorized person for corporate entity) who is or has been entrusted with a prominent public function. This includes the PEP themselves, their spouse, partner, child, parent and a close associate.

g. Does this prospective client have other brokerage accounts, in the U.S. or elsewhere?

3. What are the individual(s) or entities sources of wealth/income? (i.e. inheritance, etc. Please be specific.)

a. How did you verify source of wealth for this prospective client? (i.e. search, discussion with the client)

4. What is the anticipated type of activity that the account will engage? (Stocks, Options, Debt Instruments, Structured Products, new issues, etc. Is there a specific strategy to be used?)

5. Is the potential customer a Senior Foreign Political Official or Politically Exposed Person²? If so, state the relevant affiliation. How did you verify this information? (Search etc.) Please identify.

6. Does the individual(s) maintain any other types of accounts with the firm? If so, please identify the account number.

*Please provide/attach copies of Internet searches containing information on this prospective client, including an Internet search with the terms "Politically Exposed Person"⁽²⁾ following the client's name.

I affirm the above information is correct to the best of my knowledge, and that I have sufficient knowledge about the client within the meaning of "Know Your Customer" rule.

Registered Representative:	Date
Branch Manager	Date
AMLCO Review	Date

(1) Section 352 of the USA Patriot Act

(2) PEP is an individual (i.e. individual account holder or ultimate beneficial owner, shareholder, director, partner and authorized person for corporate entity) who is or has been entrusted with a prominent public function. This includes the PEP themselves, their spouse, partner, child, parent and a close associate.