



AML/CTF Questionnaire & Attestation

This questionnaire is mandatory for prospective applicants of Kraken who are engaged in providing services within the Financial Institution, Cryptocurrency Exchange, Investment Firm, Crypto ATM, Non-Bank Financial Institution, Third Party Payment Processor industries, or any other legal entity involved in offering cryptocurrency reselling services.

The purpose of this questionnaire and attestation is to ensure that our clients are compliant with the Anti-Money Laundering (AML) and Counter-Terrorist Financing (CTF) Program established and implemented by their relevant regulatory authorities or governing bodies responsible for combating money laundering and terrorist financing activities. Each question must be answered from the perspective of the legal entity, and the questionnaire does not cover more than one legal entity.

If "No" is selected to any of the questions, additional context is required at the bottom of each section. By completing this attestation, the legal entity is confirming they meet the necessary requirements and has implemented appropriate measures to prevent money laundering and terrorist financing activities.

The information collected in this questionnaire is part of the due diligence process at Kraken. Please note that this questionnaire will be used as a formal attestation, and therefore, by completing and submitting it, you acknowledge and certify the accuracy and truthfulness of the information provided.

Legal Entity Information

Legal Entity Name

Registered Address

Completed by

Completed date

Compliance Questions

Please tick the appropriate response for each question.

1. Is the company's AML, CTF and Sanctions Program approved at least annually by the Board or equivalent Senior Management committee? ☐ Yes ☐ No
2. Does the company have a designated Compliance Officer responsible for the overall AML Program and for coordinating and overseeing the AML Program on a day-to-day basis? ☐ Yes ☐ No
3. Has the company developed written policies for documenting procedures which are deployed for preventing, identifying and reporting suspicious transactions? ☐ Yes ☐ No
4. Does the company have an internal audit function or other independent third party that assesses AML policies and practices on a regular basis? ☐ Yes ☐ No
5. Does the company have customer identification policies and procedures consistent with applicable laws and regulations, with processes to review and update KYC information and, where appropriate, information about high-risk customers? ☐ Yes ☐ No
6. Does the company have policies and procedures for the identification, verification and monitoring for Politically Exposed Persons (PEPs), including their relatives and close associates (RCAs) and entities owned and controlled by them? ☐ Yes ☐ No

7. Does the company conduct enterprise-level risk assessments — covering customer risk (to determine appropriate due diligence), AML risk (across customers, products, services, transactions, and geographies), and sanctions risk (across the jurisdictions in which it operates)? ☐ Yes ☐ No
8. Does the company provide relevant employees with AML training — covering transaction identification and reporting, product/service-specific red flags, and internal AML policies — communicate updates on new AML legislation or policy/practice changes to those employees, and retain records of training sessions (including attendance lists and materials used)? ☐ Yes ☐ No
9. Does the company's list of prohibited countries include all OFAC sanctioned countries? ☐ Yes ☐ No

10. If the company performs customer screening against global and domestic sanctions lists, please check all that apply:

- ☐ Consolidated United Nations Security Council Sanctions List (UN)
- ☐ United States Department of the Treasury's Office of Foreign Assets Control (OFAC)
- ☐ Office of Financial Sanctions Implementation HMT (OFSI)
- ☐ European Union Consolidated List (EU)
- ☐ Lists maintained by other G7 member countries
- ☐ Other (please specify below)

If "Other," please specify

If any of the above questions were answered "No," please provide additional information or context below.

Certification

Certification by Compliance Officer, Member of Board or Senior Director (or equivalent). I certify that the responses provided in this questionnaire are a true and accurate reflection of the legal entity's Anti-Money Laundering/Counter-Terrorist Financing Program.

Full name

Signature

Title/position

Contact (email/phone)

Date