



Anti-Money Laundering (AML) and Combating the Financing of Terrorism (CFT) Questionnaire

Your cooperation on this matter will assist us to simplify and digitize this process for future screenings of your accounts.

Important Notice: This questionnaire must be signed by the designated Compliance Officer responsible for the overall Anti-Money Laundering /Countering the Financing of Terrorism (AML/CFT) Program or a senior member of the Management Board.

What is AML/CFT and why is it important to Binance?

Anti-Money Laundering (AML) refers to the legal controls put in place to prevent, detect and report money laundering activities, where illegally obtained funds are disguised as legitimate income. Countering the Financing of Terrorism (CFT) refers to the legal controls put in place to prevent, detect and report the solicitation, collection or provision of funds with the intention that they may be used to support terrorist acts or organizations. For convenience, this document refers below to AML/CFT collectively as “anti-money laundering.” As a financial institution, Binance has an obligation and a legal responsibility to prevent and detect money laundering. To achieve this, Binance has implemented a risk-based AML program to comply with laws and regulations where the firm is active. The firm has also established Sanctions Program in accordance with the Office of Foreign Assets Control (OFAC) and does not provide services to individuals and companies subject to certain sanctions regimes from around the world. It is our policy to deal only with customers that share our commitment.

What do we need from you?

Binance needs to know what strategies and policies your company has in place to prevent, detect and report suspected money laundering (including the use of the platform for fraudulent or other criminal purposes) and terrorist financing activities. This enables us to understand how your firm assists to combat money laundering and terrorist financing, identify illegal activities, ongoing controls and preventive measures.

Please be as detailed as possible especially if you conduct manual reviews and risk management on your customers.

I. General Information	
Full Legal Name	DMME HK LIMITED
Legal Form (e.g. Private / Public)	Limited Liability Company
Country of incorporation	Hong Kong (香港)
Full Legal (Registered) Street Address	8/F., CHINA HONG KONG TOWER, 8-12 HENNESSY ROAD, WAN CHAI HONG KONG, HONG KONG, Hong Kong (香港)
Address of Principal Place of Business (e.g. operating address)	8/F., CHINA HONG KONG TOWER, 8-12 HENNESSY ROAD, WAN CHAI HONG KONG, HONG KONG, Hong Kong (香港)
Business Webpage (URL)	https://it-dem.com/
Main Business Activities and countries in which customers are located	Armenia. kazakhstan. uzbekistan . Franc . Hong kong . Chian
Industry	Retail Trade - Others



II. General Anti-Money Laundering Practices and Procedures				
	Yes	No	N/A	Comments
<p>a. Is your company subject to the supervision of any prudential regulatory authority, in any jurisdiction?</p> <p>If yes, please provide the name of the supervisory / regulatory authority or authorities and indicate whether they supervise your compliance with AML/CFT requirements.</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
<p>b. Identify the AML/CFT laws to which you are subject and with which you comply.</p>				
<p>c. Does your company have a designated Compliance Officer responsible for the overall AML/CFT program and for coordinating and overseeing the AML/CFT program on a day-to-day basis?</p> <p>If yes, please provide:</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
Full Name				
Position				
Contact Number				
Email				
<p>d. Does your company have any written AML/CFT compliance program?</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	



	Yes	No	N/A	Comments
e. How often do you update the AML/CFT program?				
f. Does your company have branches / outlets outside of your home country? If yes, please indicate the exact countries? If not, please move on the question 2.g.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
g. Are you required to report to the supervisory / regulatory authorities of your home country if you operate in high risk countries? For the definition of high risk countries, Binance relies on the list shared by FATF and European Commission.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
h. How do you ensure that current AML/CFT regulations are respected within your policies and procedures? For instance, do you conduct compliance testing?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
i. In addition to inspection by government supervisors / regulations, is your company's program independently reviewed by an independent third party (e.g. external auditors,) that assess AML/CFT practices and procedures on a periodic or annual basis? If yes, please list the names of the party that conducted the independent review and the date of the most recent report. If no, please move to question 2.j.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	



	Yes	No	N/A	Comments
<p>j. Were there any significant adverse findings identified in the independent testing of government examinations within these reports? Have the issues been remediated?</p> <p>If significant adverse findings were identified, please provide a detailed statement.</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
<p>k. Does your company have procedures in place to prevent you from entering into a relationship with shell bank / organisation?</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	

III. Transaction Monitoring				
	Yes	No	N/A	Comments
<p>a. Does your company have a transaction monitoring system to detect any unusual and/or suspicious transactions?</p> <p>If yes, please provide the name of the system and indicate in-house if this is an inhouse system.</p> <p>If no, please provide information on how transactions are monitored in your Company including if your Company performs manual transaction monitoring and if your employees are trained and required to escalate unusual or suspicious activity?</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	



	Yes	No	N/A	Comments
b. Does your company have processes in place to prevent and detect any unusual and/or suspicious transactions?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
c. Do you risk rate your customers and conduct due diligence on them based on risk?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	
d. Does your company have self-assessment procedures (compliance testing) as part of your internal control environment to assure compliance with applicable AML/CFT laws and internal policies and procedures?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	
e. Does your company have procedures in place in relation to reporting suspicious transactions to relevant authorities? If Yes, please explain the procedures. If No, please provide an explanation as to why this is the case.	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	
f. Are these processes documented?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	
g. What is the name of the authorities to which you report suspicious activity?				
h. How long are relevant records retained of investigations of suspicious activity and decisions to file or not to file reports of suspicious activity?				



IV. Know Your Customers & Enhanced Due Diligence				
	Yes	No	N/A	Comments
a. Does your company have procedures in place in relation to Know Your Customer, Customer Due Diligence, and Enhanced Due Diligence (EDD)?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
b. Do you document and verify your customers' identity? What information is verified? If yes, please provide an example.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
Do you obtain and verify the location of your customers? If yes, please describe the information obtained and the verification methods used.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
What methods do you use to prevent use of the Binance platform by customers located in jurisdictions that are prohibited by the Binance terms of use?				



	Yes	No	N/A	Comments
<p>c. Does your company use documentary or non-documentary processes for identity verification?</p> <p>If yes, please describe the methods used.</p> <p>If the identity cannot be verified do you decline the relationship?</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
<p>d. Does your company conduct ongoing due diligence throughout the relationship with your customer to ensure that files are up-to-date? Do you periodically update information on a risk basis? What is the schedule? Do you conduct updated reviews upon the happening of certain risk events?</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
<p>e. Does your company conduct Enhanced Due Diligence (EDD) on higher risk customers? What does that entail?</p>	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
<p>f. Which of your customers do you consider High Risk and how is that determined? Are certain categories considered High Risk and /or is there risk scoring?</p>				



	Yes	No	N/A	Comments
g. Does your company have procedures in place to determine the expected transactions profile of customers?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
h. Does your company have procedures regarding the identification, verification and monitoring of Politically Exposed Persons (PEPs), their family and close associates and entities owned or controlled by them?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	

V. Watchlist screenings				
	Yes	No	N/A	Comments
a. Does your company have automated systems to screen all transactions against sanctions lists of persons, entities or countries issued by government/company authorities? If yes, which tool/database is used for this purpose? If no, please explain why	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
b. Please specify which of the following are part of your program?	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
OFAC	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
United Nations	<input type="radio"/>	<input type="radio"/>	<input type="radio"/>	
European Union	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
Other Local regulation	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	



	Yes	No	N/A	Comments
c. Does your company screen new customers against sanctions lists issued by the government / competent authorities before transactions are authorised / processed?	<input checked="" type="radio"/>	<input type="radio"/>	<input type="radio"/>	
d. Does your company also screen new customers against other lists (e.g. regulatory and law enforcement list)	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
e. Are customers re-screened against sanctions lists when there is a change in their corporate ownership structure?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
f. How often do you monitor that existing customers do not appear on a restricted list?				

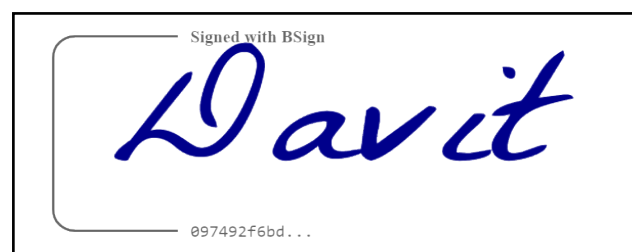
VI. Training				
	Yes	No	N/A	Comments
a. Does your company provide AML/CFT training to relevant employees that include:	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
Identification and reporting of transactions that must be reported to government authorities	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
Examples of different forms of money laundering / terrorist financing involving your products / services.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
Information on internal policies to prevent money laundering / terrorist financing and escalate suspicious activity and red flags.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	



	Yes	No	N/A	Comments
b. Does your company retain records of its training session, including attendance records and relevant materials used.	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	
c. Does your company communicate new AML/CFT related laws or changes to existing AML/CFT related policies or practices to relevant employees?	<input type="radio"/>	<input checked="" type="radio"/>	<input type="radio"/>	

Comments	
If you wish to state any relevant facts or clarify any matters regarding your answers to this questionnaire, please do so here.	

Sign:



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Date: 2024 - 11 - 01