

ATTACHMENT FOR CYPRUS (Revised April 2026)

1. QI is subject to the following laws and regulations of Cyprus, governing the requirements of QI to obtain documentation confirming the identity of QI's account holders.
 - i. The Prevention and Suppression of Money Laundering and Terrorist Financing Law of 2007 and subsequent amendments.
 - ii. CySEC Directive for the Prevention and Suppression of Money Laundering and Terrorist Financing (CySEC AML Directive) (10 May 2019) and subsequent amendments.
 - iii. CySEC Directive on the Register of Beneficial Owners of Express Trusts and Similar Legal Arrangements of 2021 and subsequent amendments.
 - iv. CySEC Policy Statement on the Enhancement of the Non-Face-to-Face Customer Onboarding Process with Electronic Methods (CySEC PS-01-2024) (6 August 2024).

2. QI represents that the laws identified above are enforced by the following enforcement bodies, and QI shall provide the IRS with an English translation of any reports or other documentation issued by these enforcement bodies that are relevant to QI's functions as a qualified intermediary.
 - i. The Central Bank of Cyprus - supervisory authority for anti-money laundering purposes with the mandate covering credit institutions, branches of foreign credit institutions, electronic money institutions, including branches and agents of foreign electronic money institutions, and payment institutions, including branches and agents.
 - ii. The Securities and Exchange Commission - supervisory authority for anti-money laundering purposes of investment firms, collective investment undertakings, companies providing administrative services and related matters, fund management companies, and crypto asset service providers.
 - iii. Insurance Companies Control Service (ICCS) - supervisory authority for anti-money laundering purposes of the activities determined by the Insurance and Reinsurance Business and Other Related Issues Law, as amended or replaced.
 - iv. Institute of Certified Public Accountants of Cyprus (ICPAC) - supervisory authority for anti-money laundering purposes for Certified Public Accountants of Cyprus and partnerships or limited liability companies, whose majority general partners or shareholders and directors are members of the ICPAC.
 - v. The Cyprus Bar Association - supervisory authority for anti-money laundering purposes of the professional activities of lawyers and companies of lawyers, as well as partnerships whose general partners are lawyers or limited liability companies of lawyers.
 - vi. The Real Estate Registry Board - supervisory authority for anti-money laundering purposes of the professional activities of real estate agents.
 - vii. The National Betting Authority - supervisory authority for anti-money laundering purposes of the activities of the betting sector.
 - viii. The National Authority of Gambling and Casino Supervision - supervisory authority for anti-money laundering purposes of casino gambling and casino financial activities

and transactions which are related to casino gambling within the Republic of Cyprus.

- ix. The Tax Commissioner - supervisory authority including but not limited to persons trading or acting as intermediaries primarily in relation to tax compliance and intermediaries from a fiscal and reporting perspective.
 - x. The Customs and Excise Department - supervisory authority including but not limited to persons trading or acting as intermediaries focused on trade-related activities, customs supervision, and enforcement of duties and excise obligations.
 - xi. The Unit for Combating Money Laundering - law enforcement authority under the provisions of the Prevention and Suppression of Money Laundering Activities Laws of 2007 as amended up to the Law 141(I)/2024.
3. QI represents that the following penalties apply for failure to obtain, maintain, and evaluate documentation obtained under the laws and regulations identified in item 1 above.
- i. To require the supervised person to take such measures within a specified time frame as may be set by the Supervisory Authority in order to remedy the situation.
 - ii. To impose an administrative fine of up to one million euro (€1.000.000) having first given the opportunity to the supervised person to be heard; and in the event that the culpable offender derived a benefit from the breach in which the benefit exceeds the administrative fine above, an administrative fine of up to an amount of at least twice the amount of the benefit derived from the breach; and in the event that the breach continues, an administrative fine of up to one thousand euro (€1.000) for each day the breach continues.
 - iii. To amend, suspend, or withdraw the license of operation of the supervised person, and in the case of a crypto assets service provider which is supervised by CySEC, to amend or suspend its registration in the register or delete it from the register.
 - iv. To impose a temporary ban against any person discharging managerial responsibilities in an obliged entity, or any other natural person, held responsible for the breach from exercising managerial functions in an obliged entity.
 - v. To impose an administrative fine referred to in 3(ii) above to a person discharging managerial responsibilities in an obliged entity or to any other person, whenever it is established that the failure to comply was due to their fault, intentional omission, or negligence.
 - vi. To require the natural or legal person responsible for the breach to cease its conduct and to desist from a repetition of that conduct. Where the obliged entity concerned is a credit institution or financial institution, the competent Supervisory Authority may, in addition to the administrative fines set out above, apply the following sanctions:
 - a. In the case of a legal person, maximum administrative pecuniary sanctions of five million euro (€5.000.000) or ten percent (10%) of the total annual turnover according to the latest available consolidated accounts approved by the management body of the legal person or their parent undertaking. Provided that where the obliged entity is a parent undertaking or a subsidiary of a parent undertaking which is required to prepare consolidated financial accounts in accordance with Article 22 of Directive 2013/34/EU, the relevant total annual turnover shall be the total annual turnover or the corresponding type of income in accordance with the relevant accounting Directives according to the last available consolidated accounts approved by the management body of the ultimate parent undertaking; and

- Beneficiaries, or where the individual benefiting from the legal arrangement or legal entity have yet to be determined, the class of persons in whose main interest the legal arrangement or entity is set up or operates, and
 - Natural persons exercising ultimate control over the trust by means of direct or indirect ownership or by other means.
- iv. For legal entities, such as foundations:
- a. Founding act or deed of foundation;
 - b. Statutes or constitutional documents (if separate);
 - c. Certificate of registration or official document confirming the establishment of the foundation;
 - d. Registered address certificate or other proof of the foundation's registered office;
 - e. Excerpt from the beneficial ownership information held in the relevant central Register of Beneficial Owners, where the foundation is subject to such registration;
 - f. List of governing body members (administrators, council members, commissioners, board);
 - g. Appointment document for authorised signatories;
 - h. Beneficial ownership declaration (aligned with Cyprus AML requirements);
 - i. Identification documents as specified in section 4(i) above for:
 - Administrators/controllers,
 - Authorised signatories,
 - Beneficiaries (where identifiable), and
 - Natural persons exercising ultimate control;
 - j. Statement of the foundation's purpose and intended activities;
 - k. Expected account activity profile (transaction types, jurisdictions, volumes);
 - l. Source of funds documentation for initial and ongoing funding;
 - m. Source of wealth documentation for founders/contributors (where applicable);
 - n. Recent financial statements or financial information for active foundations;
 - o. Activity plan or financial projections (if required) for newly formed foundations;
 - p. Legal-entity bank account application form;
 - q. KYC/AML questionnaires (including FATCA/CRS self-certification);
 - r. Any additional documents required by the bank under its risk-based approach.
5. QI shall follow the procedures set forth below (and also any procedures added by an amendment to this item 5 as agreed to by the IRS) to confirm the identity of account holders that do not open accounts in person or who provide new documentation for existing accounts other than in person. In the case of a foreign person, QI may, instead, use a Form W-8 in accordance with section 5 of this Agreement. Either QI, or a banking or securities association in Cyprus, may request an amendment to this item 5.
- i. QI shall not open an account by any means other than by establishing in person the identity of a customer through the account holder's own identity documents, except as permitted in (ii), (iii), (iv), and (v) below.
 - ii. QI may obtain by mail or otherwise a copy that is an exact reproduction of the specific documentary evidence listed in item 4 above from another person that is subject to know-your-customer rules that have been approved by the IRS for purposes of qualified intermediary agreements, provided that the laws and regulations listed in item 1 permit QI to rely on the other person to identify the account holder.
 - iii. QI may obtain a photocopy of the specific documentary evidence listed in item 4 by mail or otherwise remotely from the account holder or a person acting on behalf of the account holder, provided that the photocopy has been certified as a true and correct copy by a person whose authority to make such certification appears on the photocopy, and provided that the laws and regulations listed in item 1 permit QI to rely on the certified photocopy to identify

the account holder.

- iv. QI may obtain by mail or otherwise a copy that is an exact reproduction of the specific documentary evidence listed in item 4 from an affiliate of QI or a correspondent bank of QI, provided that the affiliate or correspondent bank has established in person the identity of the account holder and the laws and regulations listed in item 1 permit QI to rely on documentation provided by that affiliate or correspondent bank to identify the account holder.
- v. QI is permitted to onboard account holders remotely in accordance with CySEC AML Directive and CySEC PS-01-2024, provided that the requirements of the CySEC policy statement for systems, policies, procedures, controls, and measures for the remote onboarding are met with respect to the quality, completeness, accuracy and adequacy of data collected during the NFTF customer onboarding process. The CySEC PS-01-2024 sets out CySEC's binding supervisory expectations on the application of the AML law and the CySEC AML Directive in the context of remote onboarding. The policy statement builds upon Consultation Paper CP-02-2020, the EBA Guidelines on Remote Customer Onboarding, and amendments to the CySEC AML Directive. QI applies CySEC PS-01-2024 to ensure that all remote onboarding procedures comply with CySEC's supervisory standards and the applicable legal and regulatory framework. At the minimum, the following requirements should be met:
 - a. The information obtained through the Remote Customer Onboarding Systems (RCOS) is up-to-date and adequate to meet the applicable legal and regulatory standards for initial customer due diligence;
 - b. Any images, video, sound and data are captured in a readable format and with sufficient quality so that the customer is unambiguously recognisable;
 - c. The identification process does not continue if technical shortcomings or unexpected connection interruptions are detected;
 - d. Liveness detection is required for unattended solutions, i.e. where the customer does not interact with an employee to perform the verification process;
 - e. RCOS used for KYC should be either in the scope of the EU eIDAS Regulation, or conform to the additional specific safeguards listed in CySEC PS-01-2024;
 - f. The use of the RCOS for on-boarding NFTF customers is possible for natural persons and also for legal entities, including natural persons acting on their behalf.