

Account Holder Name		Prytanea, LLC																																																																																																																																	
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Ownership		<table border="1"> <thead> <tr> <th>Name</th> <th>Account Holder</th> <th>Member ≥ 25%</th> <th>Member &lt; 25%</th> <th>Managing Member</th> <th>Other Signatory</th> <th>Source of Wealth</th> <th>TIN/SSN/Identifying#</th> <th>DOB</th> <th>Street Address</th> <th>Photo ID</th> <th>FiccoSoft</th> <th>RDC</th> <th>BIS</th> <th>Google/Internet Search</th> </tr> </thead> <tbody> <tr> <td>Prytanea, LLC</td> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td>X</td> <td>X</td> <td></td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>Southern Trust Company, Inc (50% owner of Prytanea, LLC)</td> <td></td> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td>X</td> <td>X</td> <td></td> <td>X</td> <td>X</td> <td>X</td> <td></td> </tr> <tr> <td>The Pierre Trust (50% owner of Prytanea, LLC)</td> <td></td> <td>X</td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td>X</td> <td>X</td> <td></td> <td>X</td> <td>X</td> <td>X</td> <td></td> </tr> <tr> <td>Etienne Pierre Jean Binant</td> <td></td> <td></td> <td></td> <td>X</td> <td>X</td> <td></td> <td>X</td> <td>X</td> <td>X</td> <td>1</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>Jeffrey Epstein (UBO as sole shareholder of Southern Trust Company, Inc)</td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td></td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>Caroline Sophie Camille Lang (UBO as Grantor/Trustee/Beneficiary of The Pierre Trust)</td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> <td>1</td> <td>X</td> <td>X</td> <td>X</td> <td>X</td> </tr> <tr> <td>Darren Indyke (Signatory)</td> <td></td> <td></td> <td></td> <td></td> <td>X</td> <td></td> <td>X</td> <td>X</td> <td>X</td> <td>1</td> <td>X</td> <td>X</td> <td>X</td> <td></td> </tr> </tbody> </table>										Name	Account Holder	Member ≥ 25%	Member < 25%	Managing Member	Other Signatory	Source of Wealth	TIN/SSN/Identifying#	DOB	Street Address	Photo ID	FiccoSoft	RDC	BIS	Google/Internet Search	Prytanea, LLC	X						X	X	X		X	X	X	X	Southern Trust Company, Inc (50% owner of Prytanea, LLC)		X					X	X	X		X	X	X		The Pierre Trust (50% owner of Prytanea, LLC)		X					X	X	X		X	X	X		Etienne Pierre Jean Binant				X	X		X	X	X	1	X	X	X	X	Jeffrey Epstein (UBO as sole shareholder of Southern Trust Company, Inc)					X	X	X	X	X		X	X	X	X	Caroline Sophie Camille Lang (UBO as Grantor/Trustee/Beneficiary of The Pierre Trust)					X	X	X	X	X	1	X	X	X	X	Darren Indyke (Signatory)					X		X	X	X	1	X	X	X	
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- Required Approvals/Documents include but not limited to:**
- ABR Approval: non-US clients with indicia of US status (non-US client changing status to become a US person/US client changing status to become a Non-US person/POA or authorized signatory is non-U.S. but has a U.S. address)
  - AFC Reputational Risk Approval (gambling nexus)
  - AML Compliance & BRM Approval for US persons with an offshore PIC
  - Client and/or UBO from EU (refer to Tab 3 - EU Country List) - add note to client profile
  - Client Risk Program (CRP) Form for all new loans (CRP forms are required at KYC stage because loans do not go through India - NON US CLIENTS ONLY.
  - Cross Border Approval
  - CRP Escalation Body Approval - Exceptions to local exit country list permitted. **NO EXCEPTIONS** for Global exit countries
  - [YES] Evidence of source of wealth
  - Evidence of source of funds
  - ExCo Approval (High Risk KYCs For New Clients **AND** clients downgraded from low/medium to HIGH AND all Event Driven Reviews)
  - [YES] FinCEN's CDD Rule Form
  - German Bank Separation Act (GBSA) Questionnaire - required for ALL new clients (GBSA determination made for clients existing as of 6/30/17 - But NEEDS to be requested for their 50%+ indirect owners) and any in between entities that indirectly own 50% or more of client
  - [YES] Google/Internet searches: Client and UBO - at a minimum
  - Group Sustainability Approval (environmental/social risk)
  - [YES] ICIJ Offshore Leaks Database (ensure client, UBO, in-between entities, signatories are not listed in the Panama Papers database)
  - Industry Rep Risk Escalation (<https://nra.risk.intranet.db.com/ars/app/App.html>) - defense industry
  - MD Approval (New adoptions Only - all risk ratings)
  - Non-target market Approval
  - PEP/negative media escalation Approvals - Head WM AML Compliance
  - Venezuela: Line of business Approval to commence KYC adoption process
- [YES] RATIONALE MEMO stating basis for approving KYC

1. See KYC 1704382