

| M. Case Comments | | |
|------------------|-------------------|--|
| Created By | Date | Comments |
| Kshitij Golani | 9/25/118 10:04 AM | <p>This KYC serves as a high risk update for the below listed clients (together "acountholders") –</p> <ol style="list-style-type: none"> 1. ██████████ & Karyna Shuliak 2. Butterfly Trust 3. Neptune LLC <p>Below are the reasons why we are comfortable with approving this KYC:</p> <ul style="list-style-type: none"> • Information and supporting documents required by our AML Policy were provided and reviewed; and as a result, we have an understanding of the structure of the acountholders, their purpose, the purpose of the accounts and expected transaction activity. • There are a few risk factors associated with the acountholders – SOW: The UBO (Jeffrey Epstein) is the founder of Southern Trust Company Inc, which manages client's assets. SOW verification was obtained. In addition, Karyna Shuliak is an employee at JSC Interiors. We have her pay stubs under KYC – 1790724. Negative Media & PEP: There is some negative media against Mr Epstein and he is also maintains a close relationship with Bill Clinton and Prince Andrew. Please see risk calculator for more information. Appropriate approval was obtained. • Our review did not identify any red flags and thus there was no need to escalate this case further. • We performed due diligence searches on all parties and did not find the names searched to be on any sanctions lists. |
| Mayur Rathod | 9/3/118 3:17 AM | No material changes confirmation "email" attached in the case. |

| ONSHORE APPROVALS | | | |
|-----------------------------------|------------------|---------------------------------|-----------|
| Client Facing Professional (CFP): | Stewart Oldfield | (Signature) Stewart Oldfield | 9/5/2018 |
| Office Director/Business Head: | Steven Mattus | (Signature) Steven Mattus | 9/6/2018 |
| Regional Office Director: | | (Signature) | |
| AML Business Risk: | | (Signature) | |
| AML Compliance: | Kshitij Golani | (Signature) Kshitij Golani | 9/25/2018 |

| LATAM/INTERNATIONAL APPROVALS | | | |
|---|--|-------------|--|
| Client Facing Professional (CFP): | | (Signature) | |
| Account Manager: | | (Signature) | |
| Global Market Team Head (GMTH)/Sub-Market Team Head (SMTH): | | (Signature) | |
| AML Business Risk: | | (Signature) | |