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| **Question** | **Response** |
| **General** | |
| 1. Ref the FSCom AML Compliance Audit (April 2024), can you evidence that you have closed off all the open items? In particular:    1. Is the SAR backlog now clear? |  |
| 1. Fraud and APP were excluded from the report - have any audits covering these areas been undertaken previously? |  |
| 1. How many active accounts do you have open? |  |
| 1. How much client money do you currently hold? |  |
| 1. How many employees do you have? |  |
| 1. How many people are in the risk team? Please can you share a legible structure chart as well as LinkedIn profiles of the key personnel? |  |
| 1. How many people are there in the transaction monitoring team? |  |
| 1. Please can you confirm the names and provide LinkedIn profiles for the following key personnel:    1. Chief Compliance Officer    2. MLRO    3. Chief Risk Officer    4. Board Director responsible for risk and compliance |  |
| 1. Can you provide further details with regards to APP fraud risk that you money is exposed to? |  |
| **Audit specific** | |
| 1. Do you have any plans to incorporate APP into individuals’ performance targets? |  |
| 1. How will you build upon existing customer educational content and proactive communications to further raise awareness on identifying and preventing APP fraud? |  |
| 1. Please can you confirm the approach taken to sort code management? |  |
| 1. Do you plan to create a Fraud Reimbursement Policy? If so, please can you confirm timelines for completion. |  |
| 1. How will you ensure that APP fraud prevention activities are sufficiently resourced across the business? |  |
| 1. How will you ensure that the sales and marketing team are sufficiently aware of and alert to signs of potential APP fraud? |  |
| 1. Please can you provide a copy of your fraud training plan including details of the business areas and frequency of training? How are completion rates monitored? |  |
| 1. How do you ensure that the sales team are reporting suspicions of potential fraudsters in accordance with your fraud reporting policy and procedures? |  |