

Citi Non-Employee Regulatory Questionnaire Financial Industry Regulatory Authority (FINRA)

U.S. securities laws and FINRA's rules provide that no FINRA member firm may associate with a person (including persons located outside the U.S.) engaged in its investment banking or securities business that is, or becomes subject to any "statutory disqualification," as such term is defined in Section 3(a)(39) of the Securities Exchange Act of 1934 (the "Exchange Act"). As set forth in Section 3(a)(39) of the Exchange Act, certain criminal, regulatory events and findings or sanctions imposed by financial regulators will subject a person to statutory disqualification. This questionnaire is designed to assist the Firm and its U.S. broker-dealers in fulfilling their regulatory requirements under applicable U.S. securities laws and FINRA rules in identifying and screening its associated persons for statutory disqualifying events.

PLEASE READ THESE INSTRUCTIONS CAREFULLY BEFORE COMPLETING THIS QUESTIONNAIRE.

1. Your completion of this questionnaire is required due to your supporting one of more of Citi's U.S. broker-dealers and pursuant to the Securities Exchange Act of 1934 and rules and regulations promulgated thereunder. 15 U.S.C. § 78a et. Seq., and/or as part of the onboarding protocols of Citi.
2. For any matter that requires a "Yes" answer, you may be required to provide further details to a Citi Compliance and/or Legal contact upon inquiry.
3. Answer all questions completely and accurately. If you are unsure about how to answer a particular question, answer "Yes" to the question and then provide further detail to Citi Compliance and/or Legal upon inquiry.
4. All criminal matters must be disclosed, even if there was a pardon, conditional discharge, post-conviction dismissal after successful completion of a sentence or completion of diversion program, the judgment was vacated, or if the record has been expunged, sealed, expunged, vacated or set aside and even if the matter was a youth or juvenile offense.
 - a. **Note that individuals located in the following listed countries DO NOT complete the Criminal Disclosures section:** Australia, Bangladesh, Belgium, Brazil, Finland, Hong Kong, India, Ireland, Israel, Japan, Kazakhstan, The Republic of Korea, Mauritius, Mexico, Philippines, Poland, Qatar, Russian Federation, Singapore, Spain, Sri Lanka, Taiwan, Thailand, and Uruguay.
5. Underlined words in this questionnaire are defined terms. Their meanings are listed in the Appendix. In addition, whenever the questionnaire discusses "courts," presume the term to include U.S., non-U.S., and military courts.
6. If the information you have provided on this questionnaire changes or is no longer accurate, or a matter that would have required disclosure on this questionnaire occurs after you complete it, new information must be promptly submitted to the Citi Non-Employee Staffing Office partner for appropriate escalation and review.
7. Please contact the Citi Non-Employee Staffing Office if you have any questions concerning the questionnaire.

Please read the definitions for terminology included in the Appendix.

For all questions where you have responded “Yes”, please be prepared to provide full details of any action taken against you and disposition of any matter or proceeding upon inquiry from Citi.

SECTION 1: Regulatory Actions			
#1	Has any domestic or foreign court, any Regulatory Agency ever:		
a	Found you or an entity of which you were a <u>Principal</u> at the time the activities occurred, to have violated or otherwise been involved in a violation of any financial services-related statutes, rules, or regulations or been dishonest, unfair or unethical?	Yes ☐	No ☒
b	Found you, or an entity of which you were a Principal at the time the activities occurred, to have violated or been involved in a violation of any statute, rule, regulation, or order involving embezzlement, theft, extortion, fraud, fraudulent conversion, misappropriation of funds, securities, or property, forgery, counterfeiting, false pretenses, bribery, gambling, or fraudulent, manipulative, deceptive, dishonest or unfair conduct, or found you to have been unable to comply with any provision of such statute, rule or regulation?	Yes ☐	No ☒
c	Found you, or an entity of which you were a Principal at the time the activities occurred, to have assisted, aided, abetted, induced, procured, counseled, or commanded <i>another person who violated any financial services-related statutes, rules, or regulations?</i>	Yes ☐	No ☒
d	Found you, or an entity of which you were a Principal at the time the activities occurred, to have failed reasonably to supervise another person subject to your supervision and such person was involved in a <i>violation of any financial services-related statutes, rules, or regulations?</i>	Yes ☐	No ☒
e	Found you, or an entity of which you were a Principal at the time the activities occurred, to have assisted, aided, abetted, induced, procured, counseled, or commanded another person who was involved in a civil violation involving embezzlement, theft, extortion, fraud, fraudulent conversion, misappropriation of funds, securities, or property, forgery, counterfeiting, false pretenses, bribery, gambling, or fraudulent, manipulative, deceptive, dishonest or unfair conduct?	Yes ☐	No ☒
f	Found you, or an entity of which you were a Principal at the time the activities occurred, to have failed reasonably to supervise another person subject to your supervision and such person was involved in a civil violation involving embezzlement, theft, extortion, fraud, fraudulent conversion, misappropriation of funds, securities, or property, forgery, counterfeiting, false pretenses, bribery, gambling, or fraudulent, manipulative, deceptive, dishonest or unfair conduct?.	Yes ☐	No ☒
g	Found you to have made or caused to be made a false or misleading statement or omission of fact, or been dishonest, unfair or unethical, in connection with any financial services-related activity including, but not limited to, in any (i) application (or any update thereto) for membership or participation in, or to become associated with a financial services-related entity or a Self-Regulatory Organization, or (ii) report required under federal or State securities laws or substantially equivalent foreign laws or the rules of any Self-Regulatory Organization, or (iii) proceeding before the U.S. Securities and Exchange Commission, U.S. Commodity and Futures Trading Commission, any Self-Regulatory Organization, any foreign financial regulatory authority, or any domestic or foreign court, concerning a financial services-related matter?	Yes ☐	No ☒
h	Found you to be the cause of any disciplinary action, including suspension, expulsion, revocation or an order barring or otherwise restricting or limiting the ability to engage in any financial services-related activities, taken against another person or entity?	Yes ☐	No ☒

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i	Denied, suspended, revoked, barred or refused you any privileges, memberships, licenses or registrations to engage in financial services-related activity or otherwise prevented you from associating with a financial-services related entity or restricted your financial-related activities?	Yes ☐	No ☒
j	Denied, suspended, revoked or refused an entity's privileges, memberships, licenses or registrations to engage in financial services-related activity when you were a Principal of the entity, or associated with the entity in any capacity, at the time the activities occurred?	Yes ☐	No ☒
k	Taken any disciplinary action against an entity of which you were a Principal or with which you were associated at the time, involving denial, suspension, expulsion, or revocation of any privileges, memberships, licenses or registrations?	Yes ☐	No ☒
l	Permanently or temporarily enjoined you, or an entity of which you were a Principal or with which you were associated at the time, from engaging in financial-services related activities or associating with a financial-services related entity, or from engaging in or continuing any activity where such activity involves embezzlement, theft, extortion, fraud, fraudulent conversion, misappropriation of funds, securities or property, forgery, counterfeiting, false pretenses, bribery, gambling, or racketeering?	Yes ☐	No ☒
m	Permanently or temporarily enjoined you, or an entity of which you were a Principal, or with which you were associated at the time?	Yes ☐	No ☒
n	Dismissed, pursuant to a settlement agreement, any financial services-related proceeding, including civil litigation, brought by a Regulatory Agency against you, or an entity of which you were a Principal at the time the activities occurred?	Yes ☐	No ☒
o	Taken any other disciplinary action against you?	Yes ☐	No ☒
#2	Have you, or an entity of which you were a Principal at the time the activities occurred, ever been disbarred by any federal agency from contracting with the U.S.?	Yes ☐	No ☒
#3	Have you ever had your authorization to act as an attorney, accountant or federal contractor revoked or suspended?	Yes ☐	No ☒
SECTION 2: Pending Investigations or Proceedings by Regulatory Agencies			
#1	Have you been notified in writing that you, or an entity of which you were a Principal at the time the activities occurred, are presently the subject of any investigation by a Regulatory Agency?	Yes ☐	No ☒
#2	Have you been notified in writing that you, or an entity of which you were a Principal at the time the activities occurred, are presently the subject of any regulatory complaint or proceeding by a Regulatory Agency?	Yes ☐	No ☒
#3	Are you, or an entity of which you were a Principal at the time the activities occurred, presently the subject of any pending financial services-related investigations or proceedings, including civil litigations that could result in you being enjoined from engaging in any financial services-related or a finding that you were involved in a violation of any financial services-related statute, rule or regulation, or deceptive, dishonest or unfair conduct?	Yes ☐	No ☒

SECTION 3: Bonding and Financial Disclosures			
#1	Has a bonding company ever denied, paid out on, or revoked a bond for you?	Yes ☐	No ☒
SECTION 4: Additional Disclosures			
For all questions below where you have responded "YES", please be prepared to describe the details of the event, including parties involved, circumstances, case number, allegations/charges, plea, sentencing information and the final disposition to Citi upon inquiry. It may be necessary for you to produce court documentation that details the allegations; charges; classification of the offense (e.g., felony, misdemeanor); the plea, sentencing and probation information, as applicable; and the final disposition.			
#1	Are you personally involved in an issue (such as a party to any action or the subject of pending charges) the resolution of which could result in a "Yes" answer to any of the above questions	Yes ☐	No ☒
#2	Have you willfully made any materially false or misleading statement or willfully omitted to state any material fact in any application or report to the <u>Commission</u> , in any proceeding before the <u>Commission</u> or in any registration disqualification proceeding?	Yes ☐	No ☒
#3	Have you ever had a hearing before the <u>Commission</u> concerning any matter disclosed herein?	Yes ☐	No ☒
SECTION 5: Criminal Disclosures			
Note that individuals located in the following listed countries DO NOT complete the Criminal Disclosures section: Australia, Bangladesh, Belgium, Brazil, Finland, Hong Kong, India, Ireland, Israel, Japan, Kazakhstan, The Republic of Korea, Mauritius, Mexico, Philippines, Poland, Qatar, Russian Federation, Singapore, Spain, Sri Lanka, Taiwan, Thailand, and Uruguay In responding to the questions below, DO NOT include any information on juvenile convictions			
#1	Have you personally ever pled guilty, or "no contest" to, or been convicted, or <u>found</u> guilty of any <u>felony</u> ?	Yes ☐	No ☐

#2	Have you personally ever pled guilty, or been convicted, or found guilty of any <u>misdemeanor</u> in any court which: i. Arises out of conduct related to acting as a futures commission merchant, introducing broker, floor broker, floor trader, commodity trading advisor, commodity pool operator, associated person of any <u>Commission</u> registrant, securities broker, securities dealer, municipal securities broker, municipal securities dealer, transfer agent, clearing agency, securities information processor, investment adviser, investment company or an affiliated person or employee of any of the foregoing; ii. Involves embezzlement, theft, extortion, fraud, fraudulent conversion, forgery, counterfeiting, false pretenses, bribery, gambling, misappropriation of funds, securities or property; or iii. Involves a violation pertaining to: ▪ A willful failure to file an income tax return, supply information, or pay a tax; ▪ Making a fraudulent statement or failing to make a statement to employees; ▪ Making a fraudulent withholding exemption certificate or failing to supply information; ▪ Filing a fraudulent income tax return, statement or other document; or iv. Involves a violation pertaining to: ▪ Concealment of assets; false oaths and claims; bribery; ▪ Frauds and swindles; ▪ Fictitious names or addresses; ▪ Fraud by wire, radio, or television; ▪ Counterfeiting and forgery; ▪ Fraud and false statements; ▪ Racketeering; ▪ Racketeer-influenced and corrupt organizations; OR v. Involves any transaction in or advice concerning swaps, futures, options, leverage transactions or securities.	Yes ☐	No ☐
#3	Have you personally been <u>found</u> in a proceeding brought by the <u>Commission</u>, any court, any Federal or State agency or other governmental body (or by settlement, consent decree or other agreement to which one of the foregoing is a party) to have: ▪ Violated any investment-related statute; or ▪ Violated any statute or any rule, regulation or order thereunder which involves embezzlement, theft, extortion, fraud, fraudulent conversion, misappropriation of funds, securities or property, forgery, counterfeiting, false pretenses, bribery, or gambling; or ▪ Willfully assisted, aided, abetted, counseled, commanded, induced, or procured a violation (as described in the preceding two bullet points) by another person?	Yes ☐	No ☐

SECTION 6: Provision of General Information & Employment History (10 years)

Citi is subject to industry regulations that require the firm to maintain certain records regarding personnel (including non-employees), such as other names the individual may use (or used in the past) and 10 years of employment history.

(I) GENERAL INFORMATION:

First Name: _____

Last Name _____

Additional Names(s) Associated
With or Used/Aliases: _____Full Current Address: _____

_____**(II) EMPLOYMENT HISTORY:**

*Please provide all periods of employment, including military service for the last 10 years. **Start with your previous position prior to Citi assignment.** Please account for the past 10 years (with the exception of periods less than three months), even if not "employment". For example, include "Student", "Homemaker", "Unemployed" or appropriate explanation, where applicable.*

Provide additional information on a supplemental form if it cannot be documented fully in the sections below.

Name of Company #1: _____

Dates of Employment (MO/YR): _____

Position/Role: _____

Indicate if Full or Part time: _____

Name of Company #2: _____

Dates of Employment (MO/YR): _____

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Position/Role:

Indicate if Full or Part time:

Name of Company #3:

Dates of Employment (MO/YR):

Position/Role:

Indicate if Full or Part time:

Name of Company #4:

Dates of Employment (MO/YR):

Position/Role:

Indicate if Full or Part time:

BY COMPLETING AND SIGNING THIS FORM, YOU CERTIFY THAT YOUR ANSWERS ARE TRUE, COMPLETE AND ACCURATE, AND THAT YOUR ANSWERS AND STATEMENTS ARE NOT MISLEADING IN ANY MATERIAL RESPECT. YOU ALSO AGREE TO NOTIFY CITI PROMPTLY OF ANY CHANGES.

Signature:

PRINT FULL NAME:

Supplier Organization:

Maveric Systems Limited

Date (MM/DD/YY):

APPENDIX I: Definition of Terms

ADJUDICATION: in a criminal case, a determination by the court that the defendant is guilty or not guilty.

CHARGE: A formal complaint, information, indictment or equivalent instrument containing an accusation of crime.

COMMISSION: The U.S. Commodity Futures Trading Commission.

ENTITY: Any person (e.g., a corporation, partnership, limited liability company, trust, etc.) other than an individual.

FELONY: Any crime classified as a felony and for states and countries that do not differentiate between a felony and misdemeanor, an offense that could result in imprisonment for any period of more than one year. The term also includes a general Courts-Martial.

FOUND: means a determination that a conduct or rule violation has occurred. The term includes adverse final actions, including but not limited to, orders, acceptance waiver and consents, consent decrees, consent orders, stipulations, settlements in which the findings are neither admitted nor denied, judgements, permanent or temporary enjoinders, injunctions, and cease and desist orders.

FINANCIAL SERVICES RELATED: is defined as pertaining to securities, commodities, futures, swaps, security-based swaps, banking, insurance, consumer lending, or any other business or instrument subject to regulation under a financial services-related statute, rule or regulation (as defined below).

FINANCIAL SERVICES-RELATED STATUTE, RULE OR REGULATION: is defined as any law or regulation pertaining to financial services related activities and includes, without limitation, the Commodity Exchange Act [7 U.S.C. § 1 et seq.], the Securities Act of 1933 [15 U.S.C. § 77a et seq.], the Securities Exchange Act of 1934 [15 U.S.C. § 78a et seq.], the Public Utility Holding Company Act of 1935 [15 U.S.C. § 79 et seq.], the Trust Indenture Act of 1939 [15 U.S.C. § 77aaa et seq.], the Investment Advisers Act of 1940 [15 U.S.C. § 80b-1 et seq.], the Investment Company Act of 1940 [15 U.S.C. § 80a-1 et seq.], the Securities Investors Protection Act of 1970 [15 U.S.C. § 78aaa et seq.], the Foreign Corrupt Practices Act of 1977, chapter 96 of Title 18 of the United States Code, or any similar statute of a State (as defined below) or foreign jurisdiction, or any rule, regulation, or order under any such statutes, the rules of the Municipal Securities Rulemaking Board, or any rule or regulation of any Self-Regulatory Organization (as defined below).

INVESTIGATIONS: include any financial services related investigation by any “Regulatory Agency” (as defined below).

PRINCIPAL means an individual:

1. Who is sole proprietor, a manager, officer, general partner or a person in charge of a business unit, division; or function of a corporation, limited liability company or limited liability partnership; or
2. An individual who directly or indirectly, through agreement, holding companies, nominees, trusts or otherwise is the owner of or controls by voting 10% or more of the outstanding shares of any class of an entity's equity securities, other than non-voting securities.

PROCEEDING: includes a formal administrative or civil action initiated by a “Regulatory Agency” (as defined below).

REGULATORY AGENCY: includes any federal or State (as defined below) agency, foreign financial regulatory authority or Self-Regulatory Organization (as defined below) that administers or enforces financial services-related statutes, rules or regulations (as defined above) including but not limited to, the U.S. Securities and Exchange Commission, U.S. Commodity and Futures Trading Commission, U.S. Comptroller of the Currency, U.S. Board of Governors of the Federal Reserve System, U.S. Federal Deposit Insurance Corporation, U.S. Office of Thrift Supervision, National Credit Union Administration, any State (as defined below) securities commission (or any agency or office performing like functions), any State (as defined below) authority that supervises or examines banks, savings associations, or credit unions, any State (as defined below) insurance commission (or agency or office performing like functions), or any Self-Regulatory Organizations (as defined below).

SELF-REGULATORY ORGANIZATION: includes, but not limited to, any national securities or commodities exchange, any national securities association (e.g., FINRA), any registered futures association (e.g. National Futures Association), any registered futures contract market, any registered clearing agency, or any foreign or international securities exchange or futures association.

STATE: means a state, District of Columbia, the Commonwealth of Puerto Rico, the U.S. Virgin Islands or any subdivision or regulatory body thereof.

INVESTMENT-RELATED STATUTES:

1. The CEA (regulating the trading of, advice as to, and funds that invest in, commodity futures, options and swaps in the U.S.);
2. The Securities Act of 1933 (regulating the disclosure of information as to companies and securities in connection with a public sale of such securities in the U.S.);
3. The Securities Exchange Act of 1934 (regulating financial market intermediaries (brokers, dealers, exchanges) and various disclosure and governance requirements by corporations that are listed on a U.S. exchange, or broadly held by U.S. investors);
4. The Public Utility Holding Company Act (regulating the ownership and control of electric and natural gas utility companies in the U.S.);
5. The Trust Indenture Act of 1939 (regulating the content of trust indentures governing debt securities that are offered for public sale in the United States);
6. The Investment Advisers Act of 1940 (regulating the activities of persons and firms that provide professional advice as to trading in, or the value of, securities investments in the U.S.);
7. The Investment Company Act of 1940 (regulating the activities of companies, including mutual funds, that primarily engage in investing and trading in securities in the U.S.);
8. The Securities Investor Protection Act of 1970 (regulating the liquidation of insolvent securities broker-dealers);
9. The Foreign Corrupt Practices Act of 1977 (regulating the bribery of foreign officials and related accounting and recordkeeping practices in the U.S.);
10. Chapter 96 of Title 18 of the United States Code (relating to racketeer influenced and corrupt organizations);
11. Any similar statute or law of a State or of a foreign jurisdiction;
12. Any rule, regulation or order under any such statutes or laws; and
13. The rules of the Municipal Securities Rulemaking Board (e.g., investor protection rules securities firms and banks must follow when advising investors and engaging in municipal securities transactions).

MISDEMEANOR: Any crime classified as a misdemeanor and for states and countries that do not differentiate between a felony and misdemeanor, an offense that could result in imprisonment for any period of at least six days but not more than one year. By way of example, an offense for which the maximum period of imprisonment is 60 days would be considered a misdemeanor. The term also includes a special court martial.

NFA: The National Futures Association.

PERSON: An individual, association, partnership, corporation, limited liability company, limited liability partnership, trust, or other form of business organization.

SELF-REGULATORY ORGANIZATION (SRO): A private, non-governmental organization authorized to set and enforce standards of permissible conduct for an industry. NFA, FINRA (formerly known as NASD) and the securities and futures exchanges in the U.S. are examples of domestic SROs.

U.S. PERSON:

- i. Any natural person who is a resident of the United States;
- ii. A corporation, partnership, limited liability company, business or other trust, association, joint-stock company, fund or any form of enterprise similar to any of the foregoing, in each case that is either
 - a. Organized or incorporated under the laws of a state or other jurisdiction in the United States, or
 - b. Effective as of April 1, 2013, any entity having its principal place of business in the United States. Funds and other collective investment vehicles are excluded from this clause (B) of the U.S. person definition.
- iii. A pension plan for the employees, officers or principals of a legal entity described in (ii) above, unless the pension plan is primarily for foreign employees of such entity;
- iv. An estate of a decedent who was a resident of the United States at the time of death, or a trust governed by the

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laws of a state or other jurisdiction in the United States if a court within the United States is able to exercise primary supervision over the administration of the trust; or

- v. An individual account or joint account (discretionary or not) where the beneficial owner (or one of the beneficial owners in the case of a joint account) is a person described in (i) through (iv) above.

Note: This definition is based on the **Commission's** Final Exemptive Order and the definition of "U.S. Person" may be amended when the **Commission** issues its Final Cross-Border Guidance.