Auction Administered by

NATIONAL MARITIME SERVICES

AMADEA AUCTION
INDIVIDUAL & ENTITY DUE DILIGENCE POLICY

National Maritime Service, Inc.'s ("NMS") internal approval of various auction participants is required to ensure compliance with U.S. Department of Treasury Financial Crimes Enforcement Network, Bank Secrecy Act, Foreign Corrupt Practices Act, Anti-Money Laundering and Countering the Financing of Terrorism, International Know Your Customer and International Sanctions clearance requirements ("Policies"). Approvals under this policy are required for each potential ultimate beneficial owner, auction bidder, Amadea buyer, and third-party yacht broker (collectively "Applicable Parties").

Other interested parties, including NMS' contractor, Fraser Yachts (Promotional Agent), United States Marshals Service (Seller), and Alley, Maass, Rogers & Lindsay, P.A. (Escrow Agent), and any of their banking institutions (collectively with NMS "Policy Administrators") may also require internal approval of Applicable Parties. Policy Administrators will share collected information and approvals with each other.

The following information may be required from each Applicable Party at the request of Policy Administrators:

<u>Entities, such as auction bidders, buyers, and participating third-party yacht brokers</u>

- If the ownership structure of the subject entity involves multiple companies/entities, an organizational chart depicting all entities in the ownership structure, starting at the bidder entity or buyer entity level through the ultimate beneficial owner, signed and stamped by a Director of the applicable bidder entity or buyer entity
- Applicable certificates of incorporation, memorandum or articles of association, and bylaws, confirming the legal registration and formation of each entity that comprises the ownership structure
- Register of shareholders, listing the names, ownership percentage, and country of domicile of the current owners for each entity that comprises the ownership structure
- Register of directors, listing the names and country of domicile of the current directors for each entity that comprises the ownership structure

<u>Individuals including ultimate beneficial owners, entity directors and individual shareholders</u>

- Copy of valid passport or national identity card
- Proof of residential street address (such as driver license or electric bill)
- Declaration outlining the origin of wealth and the source of purchase funds

This is not an exhaustive list. Policy Administrators may request additional information from Applicable Parties, as applicable under the circumstances.

Applicable Parties are also required to represent and warrant that they are not subject to any official sanctions or prohibitions on dealings imposed by the United States of America, the United Kingdom, or the European Union or any other relevant jurisdiction.