

# CERTIFICATION REGARDING BENEFICIAL OWNERS OF LEGAL ENTITY CUSTOMERS

## WHAT IS THIS FORM?

To help the government fight financial crime, Federal regulation requires certain financial institutions to obtain, verify, and record information about the beneficial owners of legal entity customers. Legal entities can be abused to disguise involvement in terrorist financing, money laundering, tax evasion, corruption, fraud, and other financial crimes. Requiring the disclosure of key individuals who own or control a legal entity (i.e., the beneficial owners) helps law enforcement investigate and prosecute these crimes.

## WHO HAS TO COMPLETE THIS FORM?

This form must be completed by the person opening a new account on behalf of a legal entity with any of the following U.S. financial institutions: (i) a bank or credit union; (ii) a broker or dealer in securities; (iii) a mutual fund; (iv) a futures commission merchant; or (v) an introducing broker in commodities. Northern Trust may also request a form for an existing account if the legal entity's ownership structure changes, if there are changes to the account's signers, or as part of periodic file reviews.

For the purposes of this form, a legal entity includes a corporation, limited liability company, or other entity that is created by a filing of a public document with a Secretary of State or similar office, a general partnership, and any similar business entity formed in the United States or a foreign country (subject to certain exemptions).

## WHAT INFORMATION DO I HAVE TO PROVIDE?

This form requires you to provide the name, address, date of birth and Social Security number (or passport number or other similar information, in the case of non-U.S. persons) of the following individuals (i.e., the beneficial owners) for applicable legal entities.

- (i) Each individual, if any, who owns, directly or indirectly, **25 percent or more** of the equity interests of the legal entity customer (e.g., each natural person that owns **25 percent or more** of the shares of a corporation); and
- (ii) An individual with significant responsibility for managing the legal entity customer (e.g., a Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Managing Member, General Partner, President, Vice President, or Treasurer).

The number of individuals that satisfy this definition of "beneficial owner" may vary. Under section (i), depending on the factual circumstances, up to four individuals (but as few as zero) may need to be identified. Regardless of the number of individuals identified under section (i), you must provide the identifying information of one individual under section (ii). It is possible that in some circumstances the same individual might be identified under both sections (e.g., the President of Acme, Inc. who also holds a 30% equity interest). Thus, a completed form will contain the identifying information of at least one individual (under section (ii)), and up to five individuals (i.e., one individual under section (ii) and four 25 percent equity holders under section (i)).

Northern Trust will require that a copy of a Passport, or any other government-issued document evidencing nationality or residence and bearing a photograph or similar safeguard, be obtained for non-U.S. beneficial owners listed on this form. Northern Trust may also ask to see a copy of a driver's license or other identifying document for each U.S. beneficial owner listed on this form.

## PERSONS OPENING AN ACCOUNT ON BEHALF OF A LEGAL ENTITY MUST PROVIDE THE FOLLOWING INFORMATION

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*Name of Person Opening Account*

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*Title of Person Opening Account*

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*Name of Legal Entity for Which the Account is Being Opened*

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*Address of Legal Entity for Which the Account is Being Opened (Street Address Only – No P.O. Box)*

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**LEGAL ENTITY TYPE (select one):**

**If the following box is selected, complete Sections A and B on page 3 and Section C on page 5.**

- Any corporation, limited liability company, general partnership, limited partnership, or business trust created by filing with a state office that is not one of the excluded legal entity types listed below

**If one of the following legal entities is selected, complete Section A on page 3 and Section C on page 5 (Section B not required).**

- Any legal entity that is established as a nonprofit corporation or similar entity (such as charitable, nonprofit, not-for-profit, nonstock, public benefit or similar corporations) and has filed its organizational documents with the appropriate State authority as necessary
- A pooled investment vehicle that is operated or advised by a financial institution that is **NOT** one of the excluded legal entity types listed below

**If one of the following legal entities is selected, complete Section C on page 5 (Sections A and B not required.) Northern Trust may request additional documentation if one of these legal entity types is selected.**

- A pooled investment vehicle that is operated or advised by a financial institution that is one of the excluded legal entity types listed below
- A Publicly Traded Company (other than a bank) whose common stock or analogous equity interests are listed on the New York, American, or NASDAQ stock exchange, or a U.S. entity when at least 51% of its common stock or analogous equity interest is held by a listed entity (Ticker Symbol: \_\_\_\_\_)
- A Trust (other than a statutory trust created by a filing with a Secretary of State or similar officer)
- A sole proprietorship
- An unincorporated association
- A financial institution regulated by a Federal functional regulator or a bank regulated by a State bank regulator
- An insurance company that is regulated by a State
- A department or agency of the United States, or any State, or of any political subdivision of a State
- Any entity established under the laws of the United States, of any State, or of any political subdivision of any State, or under an interstate compact between two or more States, that exercise governmental authority on behalf of the United States or of any such State or political subdivision
- An issuer of a class of securities registered under section 12 of the Securities Exchange Act of 1934 or that is required to file reports under section 15(d) of that Act
- An investment company, as defined in Section 3 of the Investment Company Act of 1940, that is registered with the SEC under that Act
- An investment adviser, as defined in section 202(a)(11) of the Investment Advisers Act of 1940, that is registered with the Securities and Exchange Commission under that Act
- An exchange or clearing agency, as defined in section 3 of the Securities Exchange Act of 1934, that is registered under section 6 or 17A of the Act
- Any other entity registered with the Securities and Exchange Commission under the Securities Exchange Act of 1934
- A registered entity, commodity pool operator, commodity trading advisor, retail foreign exchange dealer, swap dealer, or major swap participant, each as defined in section 1a of the Commodity Exchange Act, that is registered with the Commodity Futures Trading Commission
- A public accounting firm registered under section 102 of the Sarbanes-Oxley Act
- A bank holding company, as defined in section 2 of the Bank Holding Company Act of 1956 (12 U.S.C. 1841) or savings and loan holding company, as defined in section 10(n) of the Home Owners' Loan Act (12 U.S.C. 1467 a(n))
- A financial market utility designated by the Financial Stability Oversight Council under Title VIII of the Dodd-Frank Wall Street Reform and Consumer Protection Act of 2010
- A non-U.S. governmental department, agency or political subdivision that engages only in governmental rather than commercial activities
- A foreign financial institution established in a jurisdiction where the regulator of such institution maintains beneficial ownership information regarding such institution

**SECTION A – CONTROL PERSON INFORMATION**

Provide the following information for one individual (natural person) with significant responsibility for managing the legal entity listed above, such as:

- An executive officer or senior manager (e.g., Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Managing Member, General Partner, President, Vice President, Treasurer); or
- Any other individual who regularly performs similar functions.

\_\_\_\_\_  
*First Name* *Middle Name* *Last Name* *Suffix*

\_\_\_\_\_  
*Title* *Date of Birth*

\_\_\_\_\_  
*Street Address (Residential or Business Street Address – No P.O. Box)*

\_\_\_\_\_  
*City* *State* *Zip*

\_\_\_\_\_  
*For U.S. Persons: Social Security Number*

\_\_\_\_\_  
*For Non-U.S. Persons: Social Security Number, Passport Number or other similar identification number\** *Country of Issuance*

\* Non-U.S. persons must provide a Social Security Number or a copy of a passport, an alien identification card or any other government-issued document evidencing nationality or residence and bearing a photograph or similar safeguard.

**SECTION B – BENEFICIAL OWNER INFORMATION**

Provide the following information for each individual (natural person), if any, who, directly or indirectly, through any contract, arrangement, understanding, relationship or otherwise, owns 25 percent or more of the equity interests of the legal entity listed above.

- Check here if no individual meets the ownership criteria listed above.**
- Check here if the Control Person listed in Section A is also a Beneficial Owner and provide their percent ownership: \_\_\_\_\_%. Provide information for additional Beneficial Owners below.**

\_\_\_\_\_  
*First Name* *Middle Name* *Last Name* *Suffix*

\_\_\_\_\_  
*Percent of Ownership* *Date of Birth*

\_\_\_\_\_  
*Street Address (Residential or Business Street Address – No P.O. Box)*

\_\_\_\_\_  
*City* *State* *Zip*

\_\_\_\_\_  
*For U.S. Persons: Social Security Number*

\_\_\_\_\_  
*For Non-U.S. Persons: Social Security Number, Passport Number or other similar identification number\** *Country of Issuance*

\* Non-U.S. persons must provide a Social Security Number or a copy of a passport, an alien identification card or any other government-issued document evidencing nationality or residence and bearing a photograph or similar safeguard.

**(Additional Beneficial Owner Information entry block on next page)**

**SECTION B – BENEFICIAL OWNER INFORMATION** *(continued)*

Provide the following information for each individual, if any, who, directly or indirectly, through any contract, arrangement, understanding, relationship or otherwise, owns 25 percent or more of the equity interests of the legal entity listed above.

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<i>First Name</i>	<i>Middle Name</i>	<i>Last Name</i>	<i>Suffix</i>
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<i>Percent of Ownership</i>	<i>Date of Birth</i>
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*Street Address (Residential or Business Street Address – No P.O. Box)*

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<i>City</i>	<i>State</i>	<i>Zip</i>
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*For U.S. Persons: Social Security Number*

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*For Non-U.S. Persons: Social Security Number, Passport Number or other similar identification number\**      *Country of Issuance*

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<i>First Name</i>	<i>Middle Name</i>	<i>Last Name</i>	<i>Suffix</i>
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<i>Percent of Ownership</i>	<i>Date of Birth</i>
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*Street Address (Residential or Business Street Address – No P.O. Box)*

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<i>City</i>	<i>State</i>	<i>Zip</i>
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*For U.S. Persons: Social Security Number*

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*For Non-U.S. Persons: Social Security Number, Passport Number or other similar identification number\**      *Country of Issuance*

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<i>First Name</i>	<i>Middle Name</i>	<i>Last Name</i>	<i>Suffix</i>
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<i>Percent of Ownership</i>	<i>Date of Birth</i>
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*Street Address (Residential or Business Street Address – No P.O. Box)*

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<i>City</i>	<i>State</i>	<i>Zip</i>
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*For U.S. Persons: Social Security Number*

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*For Non-U.S. Persons: Social Security Number, Passport Number or other similar identification number\**      *Country of Issuance*

\* Non-U.S. persons must provide a Social Security Number or a copy of a passport, an alien identification card or any other government-issued document evidencing nationality or residence and bearing a photograph or similar safeguard.

**SECTION C – CERTIFICATION**

I, \_\_\_\_\_, hereby certify, to the best of my knowledge, that the information provided above is complete and correct. This information is valid for all accounts I have requested to be opened for this legal entity at the time this Certification is provided.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_



**IMPORTANT NOTIFICATIONS**

To help the government fight financial crime, Federal regulation requires financial institutions to obtain, verify, and record information about the beneficial owners of legal entity customers. We will use the name, address, date of birth and other information provided in this form to identify each such person. We also may ask to see their driver’s license or other identifying documents.

Financial Companies choose how they share your personal information. Federal and some State laws give consumers the right to limit some but not all sharing. Federal and some State laws also require us to tell you how we collect, share, and protect your personal information. Please refer to our Privacy Notice for details: <https://www.northerntrust.com/privacy-policy>.