



New Beneficial Ownership Requirements for Legal Entities

Effective May 11, 2018, to help the government fight financial crime, financial institutions are required to obtain, verify, and record information about the beneficial owners of legal entity customers for any new deposit, loan, or safe deposit box opened. This requirement is applicable for new accounts opened by existing customers and also when there are changes to the ownership of the entity. In support of these regulatory efforts, First Palmetto Bank is implementing these requirements as of April 16, 2018.

What Types of Legal Entities are Covered by This Regulation?

For the purposes of this regulation, 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. Legal entity does not include sole proprietorships, unincorporated associations, or natural persons opening accounts on their own behalf.

What is a Beneficial Owner?

The following categories of individuals are considered beneficial owners for the purpose of this requirement:

1. 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**
2. 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).

Under category 1, 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 under category 1, the information must be provided for one individual in category 2. It is possible the same individual might be identified under both categories.

What Information is Needed to Open an Account?

For each identified beneficial owner, First Palmetto Bank requires the name, address, date of birth, Social Security number (or passport number or similar information, in the case of non-US citizens), and a **legible** copy of an unexpired picture ID (state or government issued) such as a driver's license or passport. The information on the document provided must be clearly readable.

How will First Palmetto Bank Certify This Information?

The Certification of Beneficial Owners of Legal Entities form will be used to document the required information for the beneficial owners and can be completed prior to account opening. This form may be obtained from a customer services representative or lender at any branch, or a downloadable version of this form may also be accessed through the bank's website at www.firstpalmetto.com. Return this completed form and a legible copy of an unexpired picture ID for each beneficial owner identified.



PO Box 430 Camden, SC 29021 www.firstpalmetto.com 1-800-922-7411



Certification of Beneficial Owners of Legal Entities

Financial Institution Name:		Financial Institution Location:	
Financial Institution Contact Person:	Contact Phone Number:	Customer Portfolio/Identifier:	

I. GENERAL INSTRUCTIONS

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.

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. **Legal entity** does not include sole proprietorships, unincorporated associations, or natural persons opening accounts on their own behalf.

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) for the following individuals (i.e., the **beneficial owners**):

- (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)). The financial institution may also ask to see a copy of a driver's license or other identifying document for each beneficial owner listed on this form.

II. CERTIFICATION OF BENEFICIAL OWNER(S)

Persons opening an account on behalf of a legal entity must provide the following information:

Name of Natural Person Opening Account:	Title of Natural Person Opening Account:
Type of Legal Entity for Which the Account is Being Opened:	Legal Entity Identifier (Optional):
Name of Legal Entity for Which the Account is Being Opened:	
Physical Address of Legal Entity for Which the Account is Being Opened:	

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:

Name (Beneficial Owner)	Date of Birth	Address (Residential or Business Street Address)	<i>For U.S. Persons: Social Security Number</i>	<i>For Non-U.S. Persons: Social Security Number, Passport Number and country of issuance, or other similar identification number¹</i>
First		Street		Number
Last		City State & Zip		Country of Issuance
First		Street		Number
Last		City State & Zip		Country of Issuance
First		Street		Number
Last		City State & Zip		Country of Issuance
First		Street		Number
Last		City State & Zip		Country of Issuance

If checked, Beneficial Owner listing requirement is Not Applicable

Provide the following information for one individual 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.

(If appropriate, an individual listed under the ownership section above may also be listed in the section below).

Name/Title (of Person with Control)	Date of Birth	Address (Residential or Business Street Address)	<i>For U.S. Persons:</i> Social Security Number	<i>For Non-U.S. Persons:</i> Social Security Number, Passport Number and country of issuance, or other similar identification number ¹
First Last Title		Street City State & Zip		Number Country of Issuance

¹ In lieu of a passport number, Non-U.S. Persons may also provide a Social Security Number, an alien identification card number, or number and country of issuance of any other government-issued document evidencing nationality or residence and bearing a photograph or similar safeguard.

I, _____ (*name of natural person opening account*), hereby certify, to the best of my knowledge, that the information provided above is complete and correct.

Signature: _____ Date: _____