

INFORMATION REGARDING BENEFICIAL OWNER

Part I

Customer Name:	REGON:
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Part II

Within the meaning of Article 2 paragraph 2 point 1 of Act of 1 March 2018 on counteracting money laundering and terrorist financing (Journal of Laws of 2018 item 723 with later changes) – please choose **one of the options** below:

the ultimate beneficial owner is:

- a natural person or natural persons who exercise, directly or indirectly, control over a customer through the powers held, which result from legal or actual circumstances, enabling exerting a critical impact on activities or actions undertaken by a customer or a natural person or natural persons, on whose behalf a business relationship is established;¹
- a natural person being the customer's stakeholder or shareholder holding the ownership title of more than 25% of the total number of stocks or shares of such a legal person;
- a natural person holding more than 25% of the total number of votes in the customer's governing body, also as a pledgee or a user, or under agreements with other persons authorised to vote;
- a natural person exercising control over a legal person or legal persons holding the ownership title of more than 25% of the total number of stocks or shares of the customer or jointly holding more than 25% of the total number of votes in the customer's governing body, also as a pledgee or a user, or under agreements with other persons authorised to vote;
- a natural person exercising control over customer, through holding, in relation to such legal person, powers referred to in Article 3(1)(37) of the Accounting Act of 29 September 1994 (Journal of Laws of 2019 item 351 with later changes);

in the case of documented lack of possibility to determine the identity or doubts regarding the identity of natural persons defined in the above points² - all natural persons

¹ It refers in particular to partnerships, e.g. in general if there are 5 partners in a general partnership, they all shall be indicated as ultimate beneficial owners

² E.g. a limited company in which there are 5 partners with equal shares and voting rights (each 20% each), no pledge/usage agreement or agreements between those entitled to vote, and no natural person controls the company by having the powers referred to in Article 3 par. 1 point 37 of the Act of 29 September 1994 on accounting (i.e. by analyzing the Client's documentation - such as excerpts from official registers, agreements/statutes, other reliable and independent sources - the possibility of determining the actual beneficiary based on the ownership criteria was unsuccessfully and control).

holding a senior management position (all persons all natural persons who are part of the Customer's management body).

NOTE! This lack can be determined only as a result of the analysis of the actual documentation, including the complete structure of the Customer's ownership and control. Difficulties in obtaining the above documentation does not constitute a documented inability to determine the ultimate beneficial owner(s).

in the case of a Customer being a trust - in this case, the following persons should be named as ultimate beneficial owners:

- a founder,
- a trustee,
- a supervisor, if established,
- a beneficiary,
- other person exercising control over the trust.

in the case of a Customer being a natural person pursuing economic activity in relation to whom no premises or circumstances were found that could indicate the fact of exercising control over him/her by other natural person or natural persons, it is assumed that such a Customer is simultaneously the beneficial owner.

in the case of non-profit organisations, foundations and associations without legal personality, the statement should include data of persons exercising on-going control or making executive decisions – persons authorised to represent the entities and members of internal supervising bodies.

Part III

The Customer is a company whose securities are admitted to trading on a regulated market and are subject to beneficial ownership information disclosure requirements arising from the European Union law or corresponding regulations of a third country;

Name of the stock exchange:

The Customer is a state-owned enterprise or a company with the majority stake held by the State Treasury, local government authorities or their associations;

The Customer is a public finance sector entity;

If one of the above point has been ticked, please do not fill in the Part IV.

Part IV

Please complete the table by entering the data of the ultimate beneficial owners.

Shares/control over the company (%) or position in the company	Name and Surname	Nationality	Identification document series and number	Residence address	Pesel	Date and country of birth – optional if the citizenship is provided

Part V³

Please graphically present the ownership and control structure of the Customer.

Structure chart

³ The ownership structure should be presented for each Customer, except for events/cases when based on KRS register entry or another equivalent document it is clearly stated that Company's direct owner/shareholder/stockholder is natural person holding 100% of the Customer's ownership/ interest/shares or natural persons holding 100% of the Customer's ownership/ interest/shares.

I, the undersigned, acting on behalf of the Client, hereby certify, to the best of my knowledge, that the information provided in this document is complete and correct. I undertake to inform the Bank, in writing and without delay, of any change relating to the UBO information provided.

	Full name	Position in the company⁴	Signature⁵
1			
2			
3			

Place	Date

⁴ Please indicate the exact capacity in which the representative, e.g. director, chief executive officer, manager, is acting.

⁵ This Statement must be signed by the person(s) who, by law or under the articles of association, have the power to represent the company vis-à-vis third parties.

Explanations to the Information regarding beneficial owner

Banks are obligated to identify beneficial owners pursuant to the provisions of the Act of 1 March 2018 on Counteracting Money Laundering and Financing of Terrorism.

ACT of 1 March 2018 on Counteracting Money Laundering and Financing of Terrorism

Article 2 paragraph 2 For the purpose of this Act:

1) beneficial owner - shall mean a natural person or natural persons exercising direct or indirect control over the client through held authorisations, stemming from legal or actual circumstances, facilitating the exercise of decisive influence on the actions or operations undertaken by the client, or a natural person or natural persons, on behalf of whom economic relations are established or a special transaction is executed, including:

a) for a client who is a legal person other than a company, with its securities traded on a regulated market subject to information disclosure requirements pursuant to European Union provisions of law or corresponding third country provisions of law:

- a natural person who is the client's shareholder or stockholder, entitled to ownership rights to more than 25% of the total number of shares or stocks of that legal person,
- a natural person with control over more than 25% of the total number of votes in the client's governing body, also as a pledgee or user or pursuant to agreements with others entitled to vote,
- a natural person controlling a legal person or legal persons entitled to ownership rights to more than 25% of the total number of shares or stocks of the client, or who jointly has control over more than 25% of the total number of votes in the client's body, also as a pledgee or user or pursuant to agreements with others entitled to vote,
- a natural person controlling the client through holding entitlements with respect to that legal person as referred to in Article 3 paragraph 1 of item 37 the Accountancy Act of 29 September 1994 (Journal of Laws of 2019, item 351), or
- a natural person holding a top management position in the event of a documented inability to identify or doubts as to the identity of natural persons defined in the first, second, third and fourth indent and if there are no suspicions of money laundering or financing terrorism,

b) for a client who is a trust:

- founder,
- trustee,
- supervisor, if one has been established,
- beneficiary,
- another person exercising control over the trust,

c) for a customer who is a natural person engaged in business activity, with respect to whom no evidence has been found which might point to the fact it is under the control of another natural person and natural persons, it shall be assumed that such a client is also a beneficial owner;

Article 3 paragraph 1 item 37 of the Accountancy Act of 29 September 1994:

parent company - shall mean an entity which is a commercial company or a national enterprise, exercising control over a subsidiary, and in particular:

a) directly or indirectly holding a majority of the total number of votes in the subsidiary's governing body, and also pursuant to agreement with others entitled to vote, exercising voting rights in accordance with the will of the parent company, or

b) a shareholder of the subsidiary and entitled to manage the financial and operating policy of that subsidiary in an independent manner or through persons or units designated by it pursuant to an agreement concluded with others entitled to vote, holding pursuant to company charter or articles of association, together with the parent company, a majority of votes in the governing body, or

c) a shareholder of the subsidiary and entitled to appoint and dismiss most management, supervisory or administrative body members of the subsidiary, or

d) a shareholder of the subsidiary, wherein more than half of management, supervisory or administrative body members in the previous financial year, during the current financial year and until the financial reports for the current financial year have been drawn up constitute persons appointed to perform these functions as a result of the parent company exercising its voting rights within the scope of the bodies of that subsidiary, unless another unit or person holds rights with respect to that subsidiary as referred to in letters a, c or e, or

e) a shareholder of the subsidiary and entitled to manage the financial and operating policy of that subsidiary pursuant to an agreement concluded with that subsidiary or the company charter or articles of association of that subsidiary.