

BENEFICIAL OWNERSHIP REGULATION FAQ

What is Beneficial Ownership and why is it required?

Under the Financial Crimes Enforcement Network (FinCEN), the Beneficial Ownership regulation requires all covered financial institutions to obtain information from legal entities opening a new account for deposit and loan. This regulation is implemented as part of the organization's anti-money laundering programs to help fight financial crimes.

At The Bank of San Antonio, we will be starting Beneficial Ownership regulation on April 30th, and require certain information from Beneficial Owner(s) and a Controlling Person.

What constitutes a legal entity?

A legal entity client includes corporations, limited liability companies, general partnerships and any other entity created by filing with a state office or formed under the laws of a non-US jurisdiction.

This does not include public companies, sole proprietorships, unincorporated associations, or natural persons opening accounts on their own behalf, among others.

What constitutes a Beneficial Owner?

A Beneficial Owner includes any individual who owns 25% or more equity of a legal entity.

What constitutes a Controlling Person?

An individual with significant managerial responsibility of a legal entity such as Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Managing Member, Partner, President, Vice President or Treasurer.

What information do I need to provide on the Certificate of Beneficial Ownership form?

- A. Name and title of a natural person opening the account
- B. Name and address of legal entity for which the account is being opened

For each individual who is a Beneficial Owner and Controlling Person: name, address, date of birth, social security number and identification documents such as your driver's license or passport.

