

Notice of Regulation

Effective May 11, 2018, it will be mandatory for financial institutions to comply with the new federal law regarding the beneficial ownership of legal entity customers. This regulation was implemented to protect the financial system and to assist with preventing financial crimes. In order to comply with this regulation, any time an account is opened for a legal entity, Centier Bank will request information that identifies the ultimate beneficial owner(s) and controlling person/manager of the legal entity. Required information includes the name, address, date of birth, and identification number, along with any additional information that will assist in identifying these individuals. This information will also be required for existing legal entities which establish new accounts. Centier Bank will not collect this information on personal accounts.

Legal entities must identify and attest to the ultimate beneficial owner(s) that meet specific requirements, as well as identify a controlling person/manager (Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Managing Member, General Partner, President, Vice President, or Treasurer). The Certification of Beneficial Ownership is a required form that Centier Bank must collect at account opening.

As defined by the U. S. government regulation:

Beneficial ownership consists of two roles:

- Those that have an ownership interest in the legal entity and;
- Those that control the legal entity.

Beneficial Owner:

A natural person having 25 percent or more of the equity interest of the legal entity.

Controlling Person/Manager:

A person with significant influence or managerial control over the legal entity customer (CEO, CFO, General Partner, etc.) Every legal entity client that is subject to beneficial ownership must identify one controlling person/manager, who may also be an ultimate beneficial owner.

Centier Bank, along with all financial institutions in the U.S., must be in compliance with the new beneficial ownership regulation as of the effective date of May 11, 2018.

Thank you for your business and for providing the required identifying information so that Centier Bank may meet its regulatory obligations.