

Certification Regarding Beneficial Owner(s) and Controlling Person of Legal Entity Customers

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 and/or control a legal entity 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 by U.S. financial institutions, including **Sandy Spring Bank**.

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 foreign persons) for the following individuals:

- (i) Each individual, if any, who owns, directly or indirectly, 25 percent or more of the equity interests of the legal entity customer - the **Beneficial Owners** (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 - the **Controlling Person** (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. Depending on the factual circumstances, up to four individuals (but as few as none) may need to be identified. Regardless of the number of individuals identified as defined in section (i) above, you must provide the identifying information of one individual as defined in section (ii) above. 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). Additionally, in some circumstances, based on the type of legal entity, the need for information as defined in section (i) may vary. A completed form will contain the identifying information of at least one individual as defined in section (ii), and up to four individuals as defined in section (i).

The Bank may also ask to see a copy of a driver's license or other identifying document for each person listed on this form.

II. CERTIFICATION OF BENEFICIAL OWNER(S)

The persons opening an account or maintaining a business relationship on behalf of a legal entity must provide the following information:

Section A:

Name of Individual Opening Account:	Title
Name of Legal Entity:	Entity Type
Legal Entity Address	City, State and Zip code

Section B:

The law requires a legal entity Customer disclose those individuals who have a minimum of 25% or more ownership interest in the Customer, a "Beneficial Owner". In certain instances, the Bank may require Beneficial Owner information be provided for individuals who have a minimum of 10% or more ownership interest in the Customer. This requirement is based upon many factors, such as a Customer operating in a high risk industry, such as a Money Services Business. The Bank will alert the Customer if the 10% or more threshold is required. Customers at their discretion may provide more Beneficial Owner(s) information than required.

Additional Beneficial Ownership sections should be used to identify individuals with 10% or more ownership interest in the Customer; (1) if required by the Bank, or (2) at the Customer's discretion.

Note: If the legal entity is ultimately owned by a trust, the trustee must be identified along with the name of the trust as it stated in the trust document.

Beneficial Owner Not Applicable

- ◆ Foreign Persons must provide a copy of passport or alien identification card along with completed Beneficial Ownership Form.

Beneficial Owner 1 Information: _____ % of ownership

Name	Street Address
Date of Birth	Address Line 2
For US Persons: Social Security Number	City, State and Zip code
For Foreign Persons: Primary ID Type, Number, and Issuing Location	Country /State /Postal Code

Foreign persons must provide a Social Security number, passport number and country of issuance, or similar identification number. In lieu of a passport number, foreign persons may also provide 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.

Beneficial Owner 2 Information: _____ % of ownership

Name	Street Address
_____	_____
Date of Birth	Address Line 2
_____	_____
For US Persons: Social Security Number	City, State and Zip code
_____	_____
For Foreign Persons: Primary ID Type, Number, and Issuing Location	Country/ State /Postal Code
_____	_____

Foreign persons must provide a Social Security number, passport number and country of issuance, or similar identification number. In lieu of a passport number, foreign persons may also provide 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.

Beneficial Owner 3 Information: _____ % of ownership

Name	Street Address
_____	_____
Date of Birth	Address Line 2
_____	_____
For US Persons: Social Security Number	City, State and Zip code
_____	_____
For Foreign Persons: Primary ID Type, Number, and Issuing Location	Country/ State /Postal Code
_____	_____

Foreign persons must provide a Social Security number, passport number and country of issuance, or similar identification number. In lieu of a passport number, foreign persons may also provide 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.

Beneficial Owner 4 Information: _____ % of ownership

Name	Street Address
_____	_____
Date of Birth	Address Line 2
_____	_____
For US Persons: Social Security Number	City, State and Zip code
_____	_____
For Foreign Persons: Primary ID Type, Number, and Issuing Location	Country/ State /Postal Code
_____	_____

Foreign persons must provide a Social Security number, passport number and country of issuance, or similar identification number. In lieu of a passport number, foreign persons may also provide 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.

Section C:

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 section (D) above may also be listed in this section.

- ◆ Foreign persons must provide a copy of passport or alien identification card along with completed Beneficial Ownership Form.

Controlling Person Information:

Name	Street Address
Date of Birth	Address Line 2
For US Persons: Social Security Number	City, State and Zip code
For Foreign Persons: Primary ID Type, Number, and Issuing Location	Country/ State /Postal Code

Foreign persons must provide a Social Security number, passport number and country of issuance, or similar identification number. In lieu of a passport number, foreign persons may also provide 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.

Section D:

Certification:

I, _____ (name of individual listed in **Section A of Page 2**), hereby certify, to the best of my knowledge, that the information provided above is complete and correct.

Signature: _____ Date: _____

Check this box if you consent to Sandy Spring Bank verifying beneficial ownership information with FinCEN E-Filing System.

Section E:

Addendum for additional legal entities

Check this box if the beneficial ownership information contained herein applies to all legal entities on the attached addendum, as of the certification date listed above.

**Addendum to Certification Regarding Beneficial Owner(s) and
Controlling Person of Legal Entity Customers**

Date (Must match certification date in Section D)	Name of Legal Entity	EIN#	Physical Address of Entity