

I. General instructions

What is this form?

To help the government fight financial crime, Federal regulation requires certain financial institutions, including Silicon Valley Bank, 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 (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 changing an existing account(s) or 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.

Who does not have to complete this form?

Certain types of legal entities may not need to provide beneficial ownership information. If the legal entity is one of the following entities, the person opening a new account on behalf of the legal entity does not need to provide the beneficial ownership information required by the form: (i) financial institutions regulated by a federal functional regulator or a bank regulated by a state bank regulator; (ii) certain U.S. and non-U.S. governmental entities¹; (iii) public companies with stock listed on the New York, American, or NASDAQ stock exchange; (iv) investment companies and investment advisers registered with the SEC; (v) registered entities, commodity pool operators, commodity trading advisers, retail foreign exchange dealers, swap dealers or major swap participants, each as defined in section 1a of the Commodity Exchange Act, that is registered with the Commodities Futures Trading Commodities; (vi) pooled investment vehicles, including private funds, operated or advised by a financial institution, such as an SEC-registered investment adviser, that is itself an excluded entity; (vii) insurance companies subject to state regulation; (viii) financial market utilities designated by the Financial Stability Oversight Council; and (ix) foreign financial institutions established in a jurisdiction where the home-country regulator maintains beneficial ownership information on the institution.

If you are a regulated entity please complete Section A and Section C.

Who has to complete only the control portion of this form?

Certain legal entity customers are partially excluded. Those customers are only required to submit information as to a single control person below. Legal entity customers that qualify for this treatment are: (i) pooled investment vehicles operated or advised by a financial institution not excluded above, such as a foreign fund that is not advised by an SEC-registered adviser; and (ii) nonprofit corporations or similar entities that have filed organizational documents with the appropriate U.S. state authority. FOR POOLED INVESTMENT VEHICLES PROVIDE INFORMATION ON THE MANAGING PARTNER OR THE GENERAL PARTNER.

If you believe you are partially excluded please complete Section A, question 4 on Section B, and Section C.

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):

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 who owns 25 percent or more of the shares of a corporation); and

¹ Namely, (i) a department or agency of the United States, of any State, or of any political subdivision of any State; (ii) any entity established under the laws of the United States, of any State, or of any political subdivision of any State, or under an interstate compact between two or more States, that exercises governmental authority on behalf of the United States or any such State or political subdivision; (iii) any entity, other than a bank, whose common stock or analogous equity interests are listed on the New York Stock Exchange or the American Stock Exchange or whose common stock or analogous equity interests have been designated as a NASDAQ National Market Security listed on the NASDAQ Stock Market (except stock or interests listed under the separate "NASDAQ Capital Markets Companies" heading), provided that a person that is a financial institution, other than a bank, is an exempt person only to the extent of its domestic operations; and (iv) any subsidiary, other than a bank, of any entity described in paragraph this paragraph (a "listed entity") that is organized under the laws of the United States or of any State and at least 51% of whose common stock or analogous equity interest is owned by the listed entity, provided that a person that is a financial institution, other than a bank, is an exempt person only to the extent of its domestic operations.

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)).

SVB may also ask to see a copy of a driver’s license or other identifying document for each beneficial owner listed on this form.

Section A: Company Information

Person requesting the opening an account or other triggering event constituted by SVB on behalf of a Legal Entity must provide the following information:

- Name and Primary Physical Address** of Legal Entity for which action is being taken:

Entity Name _____

Primary Physical Address _____

- Name and Title** of Natural Person requesting a change to an existing account(s) or opening a new account:

Name _____

Title _____

ARE YOU A REGULATED ENTITY?

- No Yes Check the box if you are a partially excluded entity such as a charitable organization or pooled investment vehicle.

Notes:

- If yes, please provide entity type, regulator and exemption reason. Beneficial owners' information and control person information is not required.
- If you are not a regulated entity and you are a charitable organization or pooled investment vehicle (managed or owned by a non-exempt entity), provide control person information only.
- All other ownership structures need to provide beneficial owners' and control person information.

REGULATED ENTITY TYPE	
REGULATED BY	EXEMPT REASON/COMMENTS

Section B: Certification of Beneficial Owner(S) And Control Person

No Beneficial Owner(s) own 25% or more (Check this Box if there is no Individual who owns 25% or more of the applicable entity.) If this is the case, please continue on to the completion of the Control Person.

Note: If beneficial owner is a foreign public company or government agency, proceed to the Control Person for completion.

Beneficial Owner Detail: As applicable, explain any layers of Beneficial Ownership, etc. (For example, ABC Co. is 50% owned by 123 Corp. 123 Corp. is 50% owned by John Doe; therefore, John is a 25% Beneficial Owner of ABC Co.) If submitting an organizational chart as an attachment, please note a schedule is attached to this form in the space below.

3. Select a check box for each beneficial owner. The following information for **each** individual, if any, who directly or indirectly, through any contract, arrangement, understanding, relationship, or otherwise, **owns 25% or more** of the equity interests of the Legal Entity listed above:

Name _____
 Date of Birth _____
 Residential Address _____
 Country of Citizenship _____
 Country of Residency _____
 For U.S. Person: SSN (for non-US, provide SSN if available) _____
 For Non-U.S. Persons: _____
(Type of ID, ID Number, Country, & Expiration Date)
 % of Ownership _____

Name _____
 Date of Birth _____
 Residential Address _____
 Country of Citizenship _____
 Country of Residency _____
 For U.S. Person: SSN (for non-US, provide SSN if available) _____
 For Non-U.S. Persons: _____
(Type of ID, ID Number, Country, & Expiration Date)
 % of Ownership _____

Name _____
 Date of Birth _____
 Residential Address _____
 Country of Citizenship _____
 Country of Residency _____
 For U.S. Person: SSN (for non-US, provide SSN if available) _____
 For Non-U.S. Persons: _____
(Type of ID, ID Number, Country, & Expiration Date)
 % of Ownership _____

Name _____
 Date of Birth _____
 Residential Address _____
 Country of Citizenship _____
 Country of Residency _____
 For U.S. Person: SSN (for non-US, provide SSN if available) _____
 For Non-U.S. Persons: _____
(Type of ID, ID Number, Country, & Expiration Date)
 % of Ownership _____

4. A Control Person is defined as **one** individual with significant responsibility for managing the Legal Entity listed above:

- 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 (3) above may also be listed in this section (4)).

Name _____
 Date of Birth _____
 Residential Address _____
 Country of Citizenship _____
 Country of Residency _____
 For U.S. Person: SSN (for non-US, provide SSN if available) _____
 For Non-U.S. Persons: _____
(Type of ID, ID Number, Country, & Expiration Date)

Section C: Attestation

I, _____ (name of natural person changing an existing account(s) or opening a new account), hereby certify, to the best of my knowledge, that the information above is complete and correct. This includes, if applicable, indicating that I am a Regulated Entity or qualify for an exclusion.

SIGNATURE:

_____ Signature	_____ Date
_____ Print Name	_____ Title

For additional informational, questions or concerns related to the CDD Final Rule, please visit the [FinCEN](#) website.