

### Additional information defining the beneficial owners.

The Bank is obligated by the German anti-money-laundering law (GwG) to ascertain and identify the ultimate beneficial owner. The beneficial owner means the natural person or persons in whose interest the respective business was founded. This is in accordance to German law: §3 par. 1 No. 3 in conjunction with §4 par. 5 German anti money laundering law (GwG).

#### 1. What is meant by the term beneficial owner?

- The beneficial owner is any natural person(s) who has/have a 25% or more of the shares, or control of these, of an organization.
- If there is a juristic person or an organization as an intermediary, the respective natural person(s) acting on behalf of this third party clearly need(s) to be identified.

#### 2. Information relating to the verification of the identity of the beneficiary owner.

- Information relating to the distribution of ownership within an organization can be obtained in the founding documents or the organization such as its Articles of Association, shareholder agreements or shareholder certificates.

#### 3. What information, according to anti money laundering (AML) regulations of the GWG (German prevention of money laundering law) is needed in verifying the identity of the beneficiary owner?

- As a minimum requirement we need to obtain the full name/s of all beneficiary owners i.e. their respective first and last names. Additional information such as address and date of birth may also be documented. Once this data has been submitted, a signature of the managing director confirming the beneficiary owner needs to be obtained. If the identification of the beneficiary owner is linked to the opening of an account then this respective account needs to be signed and opened by the same individual.

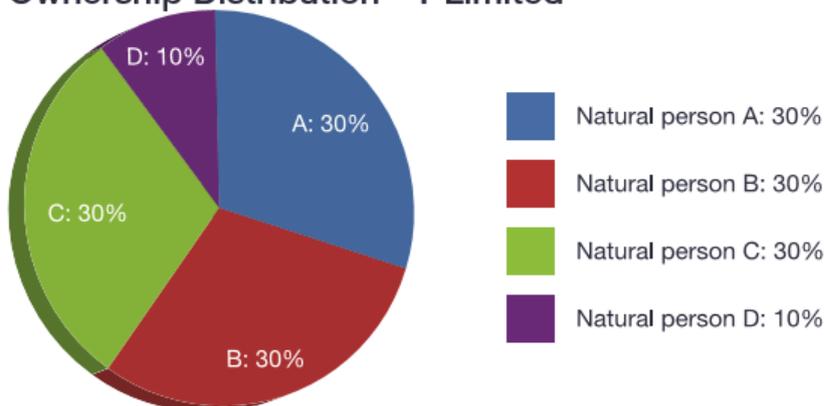
#### 4. Examples relating to the identification of the beneficial owners

##### 4.1. Registered tradesman and merchants

In the case of registered traders and merchants etc., the beneficiary owner refers to the natural person in whose name the company is registered in. This can be verified by obtaining a copy of the business registration document or from the commercial registry.

##### 4.2. T-Limited with 3 beneficiaries (contracting parties)

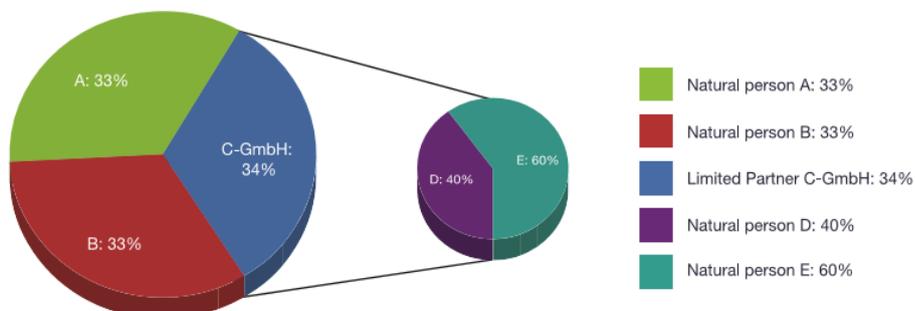
Ownership Distribution - T-Limited



- Shareholders A, B and C need to be declared as beneficial owners and their identities need to be submitted. Shareholder D does not need to be submitted as he/she has less than 25% ownership.
- Establishing who the beneficial owners are can be obtained from T-Limited's "Articles of Association or "Shareholder Certificates.

### 4.3. T-GmbH ( limited company) with 3 beneficial owners and a further GmbH (privately limited company/partnership) as a partner

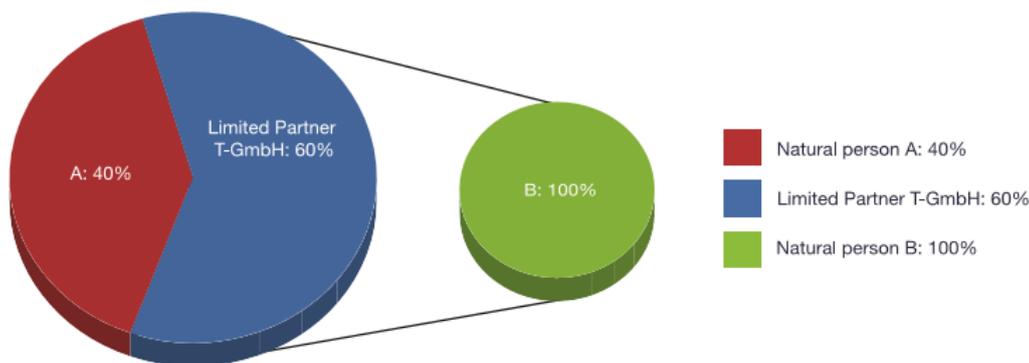
Ownership Distribution - T-Limited



- Shareholders A, B and E are all beneficial owners. A and B via the fact that they have over the 25% threshold value. For the C-GmbH (company with limited liability) it is dependent on the voting rights / share distribution among its members: D is not eligible because it has a 40% stake in the company, which is in principle not enough to have a controlling Majority of the C-GmbH. Control is only achieved if more than 50% of the voting rights / share distribution are held by one person. Therefore, E is also a beneficiary owner because this individual has more than a 50% controlling share in the C-GmbH attained by adding 34% share in C-GmbH and to that of the T-GmbH.
- Verification of the beneficiaries is obtainable from the shareholder agreements or Articles of Association of both companies i.e. T-GmbH and C-GmbH.

### 4.4. T GmbH & Co. KG / T Limited & Co. KG / T UG & Co. KG

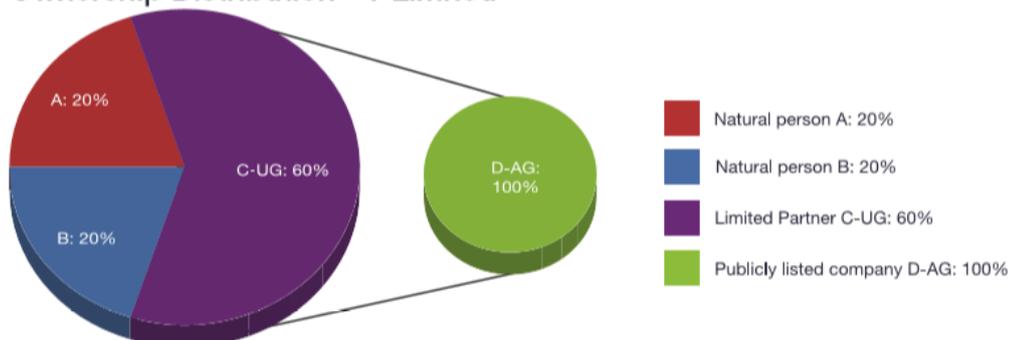
Ownership Distribution - T GmbH & Co. KG



In a limited partnership (KG) the partnership is always split into one entity having unlimited liability and the other entity having limited liability. The general partner is, depending on type of registration, always a GmbH, Limited or UG. The beneficiaries in this example are shareholders A and B since A has a direct control of 40% in the KG which exceeds the threshold value of 25%. B is also a beneficiary owner as the 60% GmbH share is allocated to the KG thus giving B a 100% controlling share. Verification of the beneficiaries is obtainable from the commercial registry (shareholder agreements / articles of association) of the GmbH / UG / Limited and/or KG.

### 4.5. T-GmbH in partnership with UG (partnership / private ltd.) and a publicly listed company

Ownership Distribution - T-Limited



- In this case no beneficial owner needs to be identified as shareholders A and B have less than a 25% share and C-UG is controlled by D-AG (plc), which is subsequently registered on the stock exchange.
- Publicly listed companies shall generally be deemed to be excluded from further clarification. Nevertheless, the partnership agreements relating to the GmbH and the C-UG must be obtained.
- Exceptions: If a publically listed company has subsidiaries and has a less than 75% controlling stake in these, then a beneficiary owner can exist and therefore this needs to be documented further. In this case the documentation needs to show whether a natural person, either directly or indirectly, has a 25% share in another subsidiary company.