

The OFT has created this sample as guidance to assist REAs with their AML/CFT obligations under the Proceeds of Crime Act 2015 and the Sanctions Act 2019. The use of this form may not guarantee compliance by your business with these obligations. Your business should therefore assess its specific money laundering, terrorist financing and proliferation financing risks and create bespoke forms to carry out appropriate Customer Due Diligence measures - Updated 28th February 2022.

FORM REA 2A

CUSTOMER DUE DILIGENCE: BENEFICIAL OWNER

This form should be completed in conjunction with form REA 1 to identify any natural persons who is an ultimate beneficial owner of the Customer or the Other Party (where relevant). One form should be completed for each such person.

Where the Customer or the Other Party is part of a larger structure you should also complete:

- Form REA 2B to identify any corporate persons (companies) involved in the structure; and
- Form REA 2C to identify any trusts or other entities involved in the structure.

For further information on beneficial owner's please see Section 6.5 and 6.6 of the OFT's AML/CFT Guidance Notes for REAs and the OFT's AML/CFT Beneficial Ownership Guidance Notes (<https://www.of.gov.gi/documents/aml-cft>)

1. Customer's or Other Party's name: _____

2. Beneficial owner's Details

Title:	
Beneficial owner's full name: (Additionally include any aliases)	
Beneficial owner's address:	
Nationality:	
Occupation:	
Appropriate identification collected? (ID/Passport)	<input type="checkbox"/> ID collected <input type="checkbox"/> Copy attached

3. Source of wealth and funds

Source of wealth:	<input type="checkbox"/> Proof attached
Source of funds:	<input type="checkbox"/> Proof attached

4. Sanction screening

For further guidance on Targeted Financial Sanctions see section 8 of the REA Guidance Notes.

Sanction screening:	<input type="checkbox"/> No hit <input type="checkbox"/> Positive hit
Are there any indicators of avoidance of sanctions regimes?	<input type="checkbox"/> Yes – please specify <input type="checkbox"/> No

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If you have a positive hit or have knowledge or suspicion that the person is a designated person you must:

- immediately freeze any identified assets or funds held or controlled by that person without delay
- not deal with the assets or make them available to the designated person;
- report to the GFIU as soon as practicable. When reporting you must include:
 - i. the information or other matter on which the knowledge or suspicion that the person is a designated person is based;
 - ii. any information you hold about the person or designated person by which they can be identified; and
 - iii. details of any funds and economic resources that you have frozen.

5. Checklist for person carrying out Customer Due Diligence

Please check the boxes below accordingly:

- Has the form been fully completed?
- Are copies of the relevant documents (e.g. copies of ID/Passports/Source of wealth) attached to this form?
- Are you confident this is the person who will ultimately benefit from the transition?
- Has appropriate CDD been requested for the beneficial owner?
- Has the beneficial owner been screened against sanctions lists?

Signature: _____

Employee name: _____

Date: _____