

The OFT has created this sample as guidance to assist REAs with their AML/CFT obligations under the Proceeds of Crime Act 2015 and 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 28 February 2022

**FORM REA 2B**  
**CUSTOMER DUE DILIGENCE: COMPANIES**

A form REA 2B should be completed in conjunction with form REA 1 to:

1. identify any company which:
  - a. is the Customer; and/or
  - b. is the Other Party to the transaction; and
2. to specify who owns or controls that company.

One form should be completed for each company.

You should also complete form REA 2A to adequately identify every beneficial owner identified in section 4 of this form.

**1. Customer's or Other Party's details**

Establish whether the company is linked to the Customer or Other Party and how:

<b>Company's relationship to the Customer or Other Party :</b>	<input type="checkbox"/> Company is the Customer <input type="checkbox"/> Company is the Other Party <input type="checkbox"/> Parent company of the Customer <input type="checkbox"/> Parent company of the Other Party <input type="checkbox"/> Other (please specify) _____
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**2. Company's Details**

<b>Company name:</b>	
<b>Jurisdiction of incorporation:</b>	
<b>Incorporation number:</b>	
<b>Certificate of incorporation:</b>	<input type="checkbox"/> Collected <input type="checkbox"/> Copy attached
<b>Registered office:</b>	
<b>Principal place of business:</b> (If different to Registered office)	

**3. Shareholders & director details**

<b>Register of Members OR up-to-date Company profile showing legal shareholders:</b>	<input type="checkbox"/> Collected <input type="checkbox"/> Copy attached
<b>Register of Directors OR up-to-date Company profile showing appointed directors:</b>	<input type="checkbox"/> Collected <input type="checkbox"/> Copy attached

**4. Beneficial ownership & control of company**

For guidance refer to the OFT's Beneficial Ownership Guidance Notes.

<b>Please provide details of every individual (if any) that:</b>
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<p><b>1. is the beneficial owners of more than 25% percentage of shares in the company:</b></p> <p>State the shareholder who holds the shares legally and the beneficial owner for who it holds those shares.</p> <p>If there are more than two beneficial owners please use a separate sheet.</p>	<p>1. Legal shareholder: _____ Beneficial owner: _____ Percentage of shares held _____%</p> <p>2. Legal shareholder: _____ Beneficial owner: _____ Percentage of shares held _____%</p> <p><input type="checkbox"/> Document reflecting arrangements collected</p>
<p><b>2. holds, directly or indirectly, more than 25% of voting rights in the company:</b></p> <p>Voting rights are usually held by shareholders.</p>	<p>1. Individual: _____ Voting rights held _____%</p> <p>2. Individual: _____ Voting rights held _____%</p>
<p><b>3. holds, directly or indirectly, the right to appoint or remove a majority of the board of directors of the company other than through the voting rights set out in 2 above.</b></p>	<p>Individual: _____ Please specify how they can exercise control:</p>
<p><b>4. has the right to execute, or actually exercise control over the company or business:</b></p>	<p>Individual: _____ Please specify how they can exercise control:</p>

### 5. Sanction screening

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

<p><b>Sanction screening:</b></p>	<p><input type="checkbox"/> No hit <span style="margin-left: 150px;"><input type="checkbox"/> Positive hit</span></p>
<p><b>Are there any indicators of avoidance of sanctions regimes?</b></p>	<p><input type="checkbox"/> Yes – please specify <span style="margin-left: 100px;"><input type="checkbox"/> No</span></p> <p>_____</p>

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

- immediately freeze any identified assets or funds held or controlled by that entity without delay;
- not deal with the assets or make them available to the designated entity;
- 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 entity is a designated person is based;
  - ii. any information you hold about the entity or designated person by which they can be identified; and

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iii. details of any funds and economic resources that you have frozen.

## 6. Checklist for person carrying out Customer Due Diligence

Please check the boxes below accordingly:

- Has the form be fully completed?
- Are you confident you understand who the person(s) who ultimately owns or controls the company is?
- Are copies of the relevant documents (e.g. company profile/registers) attached to this form?
- Has the company been screened against sanctions lists?

**Signature:** \_\_\_\_\_

**Employee name:** \_\_\_\_\_

**Date:** \_\_\_\_\_

OFT SAMPLE