

## Customer Due Diligence form

Under the Dutch Money Laundering and Terrorist Financing Act (Wwft) and the Sanctions Act, we are obliged to carry out Customer Due Diligence (hereinafter: "CDD") when a current or new client or employer wishes to conclude or extend a pension scheme. Completion of this CDD means we know exactly with whom we do business.

We need information and documents to assess whether we can administer the pension scheme. This is important not only for our Customer Due Diligence, but also for the subsequent processing of the pension scheme in our administration. Once all the necessary documents are delivered, we check the data and we assess whether the agreement can be concluded.

### The undersigned

Company name	<input type="text"/>
CoC number	<input type="text"/>
Legal form	<input type="text"/>
Registered office	<input type="text"/>

### Ultimate beneficial owner(s)

Is there a single or are there multiple ultimate beneficial owners (UBO), as referred to in the Wwft:

- who, by virtue of ownership and/or control, have a direct or indirect interest of more than 25% in your organisation;
- who have effective control and/or influence in your organisation?

An explanation of ownership, effective or other form of control and influence can be found in the explanatory notes.

Yes, continue to section 1. Statement of identity of ultimate beneficial owner(s).

No, go to section 2. Statement of identity of senior management (Pseudo-UBO).

### 1. Statement of identity of ultimate beneficial owner(s)

The explanatory notes describe which persons qualify as UBOs based on ownership, control or effective control.

1	Full first names	<input type="text"/>
	Insert(s)	<input type="text"/>
	Surname at birth	<input type="text"/>
	Date of birth	<input type="text"/>
	Country of residence	<input type="text"/>
	Nature of interest	Ownership: <input type="text"/> %      Control: <input type="text"/> % Effective control
2	Full first names	<input type="text"/>
	Insert(s)	<input type="text"/>
	Surname at birth	<input type="text"/>
	Date of birth	<input type="text"/>
	Country of residence	<input type="text"/>
	Nature of interest	Ownership: <input type="text"/> %      Control: <input type="text"/> % Effective control

3 Full first names \_\_\_\_\_  
 Insert(s) \_\_\_\_\_  
 Surname at birth \_\_\_\_\_  
 Date of birth \_\_\_\_\_  
 Country of residence \_\_\_\_\_  
 Nature of interest Ownership: \_\_\_\_\_ % Control: \_\_\_\_\_ %  
 Effective control

4 Full first names \_\_\_\_\_  
 Insert(s) \_\_\_\_\_  
 Surname at birth \_\_\_\_\_  
 Date of birth \_\_\_\_\_  
 Country of residence \_\_\_\_\_  
 Nature of interest Ownership: \_\_\_\_\_ % Control: \_\_\_\_\_ %  
 Effective control

My company has more than four UBOs. State these persons in Appendix 1 at the end of the document.

I hereby confirm that there are no other UBOs with an interest of more than 25% ownership or effective or other form of control.

After entering the above information, go to section 3. "Business activities"

## 2. Statement of identity of senior management (Pseudo UBO)

The explanatory notes describe the persons who qualify as senior management personnel.

1 Full first names \_\_\_\_\_  
 Insert(s) \_\_\_\_\_  
 Surname at birth \_\_\_\_\_  
 Date of birth \_\_\_\_\_  
 Country of residence \_\_\_\_\_

2 Full first names \_\_\_\_\_  
 Insert(s) \_\_\_\_\_  
 Surname at birth \_\_\_\_\_  
 Date of birth \_\_\_\_\_  
 Country of residence \_\_\_\_\_

3 Full first names \_\_\_\_\_  
 Insert(s) \_\_\_\_\_  
 Surname at birth \_\_\_\_\_  
 Date of birth \_\_\_\_\_  
 Country of residence \_\_\_\_\_

4 Full first names \_\_\_\_\_  
 Insert(s) \_\_\_\_\_  
 Surname at birth \_\_\_\_\_  
 Date of birth \_\_\_\_\_  
 Country of residence \_\_\_\_\_

My company has more than four individuals who are considered senior management (Pseudo UBOs).

List these persons in Appendix 2 at the end of this document.

I hereby confirm that there are no other persons who are considered to be senior management (Pseudo UBOs).

After entering the above information, go to section 3. "Business activities".

### 3. Business activities

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In conclusion, please answer the following questions.

1. In your own words, describe your company's business activities in as much detail as possible.


2. Which of the following countries does your company do business with?  
State the percentage of total revenue generated in the country(ies) concerned.

Belarus	_____ %	Russia	_____ %
Cuba	_____ %	Sudan	_____ %
Iran	_____ %	Syria	_____ %
North Korea	_____ %	None of these countries.	

3. Which of the following countries does the group of which your company forms part do business with?  
Please also state the percentage of total revenue generated in the country(ies) concerned.

Belarus	_____ %	Russia	_____ %
Cuba	_____ %	Sudan	_____ %
Iran	_____ %	Syria	_____ %
North Korea	_____ %	None of these countries.	

If you have indicated in questions 2 and/or 3 that your company or the group of which your company is part does business with one or more of these countries, please answer the questions below. If you have ticked 'None of these countries' for both questions, you can proceed directly to the signature.

4. Describe the business activities in the country you have ticked and state the group company that carries out these business activities.

Country	Name of company	Description of business activities

5. If your company and/or a company within the organisation of which your company is a part located in one of the above countries, state the name of that company and the country in which it is located below.

Name of company	Country

6. State below per country whether you expect the revenue to increase, decrease or remain the same in the next 5 years. Please do so for your company and/or a company within the organisation of which your company is a part. Include an explanation for this forecast.

Country	Revenue: expected to increase/decrease/remain the same	Explanation of this revenue forecast

7. Does your company and/or a company within the organisation your company is part of have contact with government officials in any of the above countries? You do not need to indicate regular and necessary contacts for matters such as permits, for example. If yes, state the government official with whom your company is in contact and which of the above countries it operates in.

Government official	Country

Continue to section 4. "Declaration and signature".

#### 4. Declaration and signature

The authorised signatory(ies) as registered in the Chamber of Commerce (CoC) hereby declare(s) that:

- All information provided is truthful;
- Changes in respect of the ultimate beneficial owner(s) will be reported to the insurance adviser and/or Nationale-Nederlanden as soon as possible.

Sign jointly if you are jointly authorised according to the Chamber of Commerce.

1 Name

Country of residence

Date

Town/city

Signature

2 Name

Country of residence

Date

Town/city

Signature

We may have additional questions based on the information provided. We ask for your understanding of this. If you have questions, please contact your adviser or your contact person at Nationale-Nederlanden.

## Explanation

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We explain how to determine the ultimate beneficial owners for each legal form. For more information about the UBO, go to [kvk.nl](#). For more information about the Sanctions Act, go to [dnb.nl](#).

### **Your organisation is a BV (private limited company), NV (public limited company) or similar legal entity**

The natural persons qualifying as UBOs are:

- the ultimate owner or person controlling the company through direct or indirect ownership of more than 25% of:
  - > the shares
  - > the voting rights
  - > the ownership interest in the company.
- have another form of effective control<sup>1</sup>.

If you cannot determine a UBO based on the above, the company's senior management will qualify as UBOs. These are the directors listed in the articles of association who are or have to be registered with the CoC.

### **Your organisation is a general partnership (vennootschap onder firma, or VOF), limited partnership (commanditaire vennootschap, or CV) or private partnership (maatschap)**

Natural persons who ultimately own or control the partnership qualify as UBOs through:

- direct or indirect ownership of more than 25% of the ownership interest.
- the ability to exercise more than 25% of the voting rights, directly or indirectly.
- the ability to exercise effective control<sup>1</sup>.

If you cannot determine a UBO based on the above, the company's senior management will qualify as UBOs. These are the directors listed in the articles of association who are or have to be registered with the CoC.

### **Your organisation is a church association**

The natural persons who, upon dissolution of the church association, are appointed as legal successors in the church's articles of association qualify as UBOs. If you cannot determine a UBO on this basis, then the natural persons listed as directors in the articles of association or as directors in the documents of the church organisation qualify as UBOs.

### **Your organisation is an Association, Cooperative or Foundation**

The UBOs are the natural persons who ultimately own or control the legal entity, via the direct or indirect:

- ownership of more than 25% of the ownership interest.
- ability to exercise more than 25% of the votes in decision-making relating to
- amendments to the articles of association.
- the ability to exercise effective control<sup>1</sup> over the legal entity.

If you cannot determine a UBO based on the above, the company's senior management will qualify as UBOs. These are the directors listed in the articles of association who are or have to be registered with the CoC.

Examples:

#### 1. Association:

The following is important for determining who qualifies as a UBO of an association:

- Are there directors and/or members of the association who are able to directly or indirectly exercise more than 25% of the votes when deciding on amendments to the association's articles of association? This will in any case apply if the number of members is limited (less than 4).
- Are there directors and/or members of the association able to exercise effective control? For example, an honorary member who exercises decisive influence on decision-making in the background.

If the above does not apply to the association, the board under the articles of association will be regarded as the UBO. This is the board that is or has to be registered with the CoC.

<sup>1</sup>Exercise of actual control and/or influence means in practice that a person takes strategic decisions on a daily basis.

## 2. Foundation

To determine the UBO of a foundation, it is necessary to determine who should be regarded as a UBO on the basis of ownership or effective or other form of control. The articles of association of the foundation can be useful to understand the ownership and/or control structure:

### Ownership

- In the case of foundations, profit distributions are also considered to be an ownership interest.
- Who are the beneficiaries of profit distributions by the foundation? If a person receives more than 25% of the profit distributions, this is an indication that this person qualifies as a UBO.
- Who is the beneficiary of the remaining balance if the foundation is dissolved? If a specific person is mentioned here, this is an indication that this person qualifies as a UBO.

### Control

- If one of the directors of a foundation is able to exercise more than 25% of the voting rights, they are considered to be a UBO.
- The exercise of effective control is that someone in practice takes strategic decisions on a daily basis. This may also be the case if this person has no formal control.

### **Your organisation is a trust or similar legal form**

The following can be regarded as UBOs:

- the founders
- the trustees
- the protectors
- the beneficiaries
- any other natural person who ultimately exercises control over the trust through direct or indirect ownership or other means.

If you cannot determine a UBO based on the above, the board under the articles of association of the foundation qualifies as the UBO. These are the board members who are or have to be registered with the CoC.

**Appendix 1 Statement of identity of ultimate beneficial owner(s) (if more than 4)**

5	Full first names	_____	
	Insert(s)	_____	
	Surname at birth	_____	
	Date of birth	_ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _	
	Country of residence	_____	
	Nature of interest	Ownership: _____ %	Control: _____ %
		Effective control	
6	Full first names	_____	
	Insert(s)	_____	
	Surname at birth	_____	
	Date of birth	_ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _	
	Country of residence	_____	
	Nature of interest	Ownership: _____ %	Control: _____ %
		Effective control	
7	Full first names	_____	
	Insert(s)	_____	
	Surname at birth	_____	
	Date of birth	_ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _	
	Country of residence	_____	
	Nature of interest	Ownership: _____ %	Control: _____ %
		Effective control	
8	Full first names	_____	
	Insert(s)	_____	
	Surname at birth	_____	
	Date of birth	_ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _	
	Country of residence	_____	
	Nature of interest	Ownership: _____ %	Control: _____ %
		Effective control	
9	Full first names	_____	
	Insert(s)	_____	
	Surname at birth	_____	
	Date of birth	_ _ _ _ _ _ _ _ _ _ _ _ _ _ _ _	
	Country of residence	_____	
	Nature of interest	Ownership: _____ %	Control: _____ %
		Effective control	

10 Full first names \_\_\_\_\_  
Insert(s) \_\_\_\_\_  
Surname at birth \_\_\_\_\_  
Date of birth \_\_\_\_\_  
Country of residence \_\_\_\_\_  
Nature of interest Ownership: \_\_\_\_\_ % Control: \_\_\_\_\_ %  
Effective control

11 Full first names \_\_\_\_\_  
Insert(s) \_\_\_\_\_  
Surname at birth \_\_\_\_\_  
Date of birth \_\_\_\_\_  
Country of residence \_\_\_\_\_  
Nature of interest Ownership: \_\_\_\_\_ % Control: \_\_\_\_\_ %  
Effective control

12 Full first names \_\_\_\_\_  
Insert(s) \_\_\_\_\_  
Surname at birth \_\_\_\_\_  
Date of birth \_\_\_\_\_  
Country of reside \_\_\_\_\_  
Nature of interest Ownership: \_\_\_\_\_ % Control: \_\_\_\_\_ %  
Effective control

13 Full first names \_\_\_\_\_  
Insert(s) \_\_\_\_\_  
Surname at birth \_\_\_\_\_  
Date of birth \_\_\_\_\_  
Country of residence \_\_\_\_\_  
Nature of interest Ownership: \_\_\_\_\_ % Control: \_\_\_\_\_ %  
Effective control

14 Full first names \_\_\_\_\_  
Insert(s) \_\_\_\_\_  
Surname at birth \_\_\_\_\_  
Date of birth \_\_\_\_\_  
Country of residence \_\_\_\_\_  
Nature of interest Ownership: \_\_\_\_\_ % Control: \_\_\_\_\_ %  
Effective control

15 Full first names \_\_\_\_\_  
Insert(s) \_\_\_\_\_  
Surname at birth \_\_\_\_\_  
Date of birth \_\_\_\_\_  
Country of residenc \_\_\_\_\_  
Nature of interest Ownership: \_\_\_\_\_ % Control: \_\_\_\_\_ %  
Effective control



16 Full first names \_\_\_\_\_  
Insert(s) \_\_\_\_\_  
Surname at birth \_\_\_\_\_  
Date of birth \_\_\_\_\_  
Country of residence \_\_\_\_\_  
Nature of interest Ownership: \_\_\_\_\_ % Control: \_\_\_\_\_ %  
Effective control

17 Full first names \_\_\_\_\_  
Insert(s) \_\_\_\_\_  
Surname at birth \_\_\_\_\_  
Date of birth \_\_\_\_\_  
Country of residence \_\_\_\_\_  
Nature of interest Ownership: \_\_\_\_\_ % Control: \_\_\_\_\_ %  
Effective control

After entering the above information, proceed to the confirmation that there are no other UBOs with an interest of more than 25% ownership or effective or other form of control.

**Appendix 2 Statement of identity of senior management (Pseudo UBO) (if more than 4)**

5	Full first names	_____
	Insert(s)	_____
	Surname at birth	_____
	Date of birth	_____ _____ _____
	Country of residence	_____
6	Full first names	_____
	Insert(s)	_____
	Surname at birth	_____
	Date of birth	_____ _____ _____
	Country of residence	_____
7	Full first names	_____
	Insert(s)	_____
	Surname at birth	_____
	Date of birth	_____ _____ _____
	Country of res	_____
8	Full first names	_____
	Insert(s)	_____
	Surname at birth	_____
	Date of birth	_____ _____ _____
	Country of residence	_____
9	Full first names	_____
	Insert(s)	_____
	Surname at birth	_____
	Date of birth	_____ _____ _____
	Country of residence	_____
10	Full first names	_____
	Insert(s)	_____
	Surname at birth	_____
	Date of birth	_____ _____ _____
	Country of residence	_____
11	Full first names	_____
	Insert(s)	_____
	Surname at birth	_____
	Date of birth	_____ _____ _____
	Country of residence	_____

12	Full first names	<input type="text"/>
	Insert(s)	<input type="text"/>
	Surname at birth	<input type="text"/>
	Date of birth	<input type="text"/>
	Country of residence	<input type="text"/>
13	Full first names	<input type="text"/>
	Insert(s)	<input type="text"/>
	Surname at birth	<input type="text"/>
	Date of birth	<input type="text"/>
	Country of residence	<input type="text"/>
14	Full first names	<input type="text"/>
	Insert(s)	<input type="text"/>
	Surname at birth	<input type="text"/>
	Date of birth	<input type="text"/>
	Country of residence	<input type="text"/>
15	Full first names	<input type="text"/>
	Insert(s)	<input type="text"/>
	Surname at birth	<input type="text"/>
	Date of birth	<input type="text"/>
	Country of residence	<input type="text"/>
16	Full first names	<input type="text"/>
	Insert(s)	<input type="text"/>
	Surname at birth	<input type="text"/>
	Date of birth	<input type="text"/>
	Country of residence	<input type="text"/>
17	Full first names	<input type="text"/>
	Insert(s)	<input type="text"/>
	Surname at birth	<input type="text"/>
	Date of birth	<input type="text"/>
	Country of residence	<input type="text"/>

After entering the above information, proceed to the confirmation that there are no other UBOs with an interest of more than 25% ownership or effective or other form of control.