

Certification Regarding Ultimate Beneficial Owners of Legal Entity Customers

General Instructions

What is this form?

To help the government fight financial crime, federal regulation requires certain financial institutions to obtain, verify, and record information about the ultimate 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 ultimately own or control a legal entity (i.e., the ultimate beneficial owners) helps law enforcement investigate and prosecute these crimes.

Who has to complete this form?

This information must be provided by the person opening a new account or updating business information 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 filing of a public document with a Secretary of State or similar office, a general partnership, and any other similar business entity formed in the United States or a foreign country. A legal entity does not include sole proprietorships, unincorporated associations, or natural persons opening accounts on their own behalf. For a full list of exemptions refer to Appendix A.

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 foreign persons¹) for the following individuals (i.e., the ultimate beneficial owners):

- (i) 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 that owns 25 percent or more of the shares of a corporation);
- (ii) 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 "ultimate 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)).

Please provide a copy of a driver's license or other identifying document for each ultimate beneficial owner listed on this form.

Certification of Ultimate Beneficial Owner(s)

Name of Person opening account or updating information below

Name of Legal Entity for which the account is being opened/maintained

Tax Identification Number of Legal Entity

¹ In lieu of a passport, foreign persons may also provide a U.S. government-issued Alien ID or other foreign government-issued documents evidencing nationality or residence and bearing a photograph or similar safeguard.

A. Ultimate Beneficial Ownership Information:

Please provide the following information for each individual, if any, who, directly or indirectly, through any contract, arrangement, understanding, relationship or otherwise, owns 25 percent or more of the equity interests of the legal entity listed above.² If no individual meets this definition, please check “No Individual owns 25% or more of the Legal Entity Customer” below and skip to section B.

No Individual owns 25% or more of the Legal Entity Customer

Ultimate Beneficial Owner #1: _____ % ownership

Individual is an FHB Customer (provide the name and last 4 digits of their SSN below).

Individual Name (First, Middle Initial, Last)		Social Security Number (if FHB Customer, provide last 4 digits)		
If the individual is not an FHB customer, please also provide the following:				
Date of Birth (mm/dd/yyyy)	ID Type ¹	Street Address		
ID St/Ctry/Prov of Issuance	ID Number	City	State	Country
Issue Date (mm/dd/yyyy)	Exp Date (mm/dd/yyyy)	ZIP / Postal Code		

Ultimate Beneficial Owner #2: _____ % ownership

Individual is an FHB Customer (provide the name and last 4 digits of their SSN below).

Individual Name (First, Middle Initial, Last)		Social Security Number (if FHB Customer, provide last 4 digits)		
If the individual is not an FHB customer, please also provide the following:				
Date of Birth (mm/dd/yyyy)	ID Type ¹	Street Address		
ID St/Ctry/Prov of Issuance	ID Number	City	State	Country
Issue Date (mm/dd/yyyy)	Exp Date (mm/dd/yyyy)	ZIP / Postal Code		

Ultimate Beneficial Owner #3: _____ % ownership

Individual is an FHB Customer (provide the name and last 4 digits of their SSN below).

Individual Name (First, Middle Initial, Last)		Social Security Number (if FHB Customer, provide last 4 digits)		
If the individual is not an FHB customer, please also provide the following:				
Date of Birth (mm/dd/yyyy)	ID Type ¹	Street Address		
ID St/Ctry/Prov of Issuance	ID Number	City	State	Country
Issue Date (mm/dd/yyyy)	Exp Date (mm/dd/yyyy)	ZIP / Postal Code		

¹ In lieu of a passport, foreign persons may also provide a U.S. government-issued Alien ID or other foreign government-issued documents evidencing nationality or residence and bearing a photograph or similar safeguard.

² Beneficial ownership information at a lower percentage may be requested should the account meet certain criteria after onboarding.

Ultimate Beneficial Owner #4: _____ % ownership
 Individual is an FHB Customer (provide the name and last 4 digits of their SSN below).

Individual Name (First, Middle Initial, Last)	Social Security Number (if FHB Customer, provide last 4 digits)

If the individual is not an FHB customer, please also provide the following:

Date of Birth (mm/dd/yyyy)	ID Type ¹	Street Address		
ID St/Ctry/Prov of Issuance	ID Number	City	State	Country
Issue Date (mm/dd/yyyy)	Exp Date (mm/dd/yyyy)	ZIP / Postal Code		

B. Individual with Control:

Please provide the following information for one individual with significant responsibility for managing the legal entity (Individual with Control) listed above, such as:

- 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 A above may also be listed in this Section B (check box below).

Title of Individual with Control: _____

 Individual with Control is the same as Ultimate Beneficial Owner #_____. Skip to Section C.

 Individual with control is an FHB Customer (provide the name and last 4 digits of their SSN below).

Individual Name (First, Middle Initial, Last)	Social Security Number (if FHB Customer, provide last 4 digits)

If the individual is not an FHB customer, please also provide the following:

Date of Birth (mm/dd/yyyy)	ID Type ¹	Street Address		
ID St/Ctry/Prov of Issuance	ID Number	City	State	Country
Issue Date (mm/dd/yyyy)	Exp Date (mm/dd/yyyy)	ZIP / Postal Code		

C. Certified/Agreed To:

I, _____ (name of natural person opening account or updating business information), hereby certify, to the best of my knowledge, that the information provided above is complete and correct and the documentation provided with this form is true and correct. I further agree that the legal entity customer will notify First Hawaiian Bank promptly if there are any changes to this information.

Signature
Date

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For Internal Use Only

Were all IDs verified?	<input type="checkbox"/> Yes <input type="checkbox"/> No	Verified UBOs are existing customers?	<input type="checkbox"/> Yes <input type="checkbox"/> N/A	If non-deposit account for new customer, was Bridger performed?	<input type="checkbox"/> Yes <input type="checkbox"/> N/A <input type="checkbox"/> No
Employee Name and Initial		Branch/Business Unit		For deposit accounts, supervisor initial and date	

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Appendix A – List of Exempt Entities

Financial Institution Type Entities:

1. Financial institutions regulated by a Federal functional regulator or a bank regulated by a State bank regulator
2. A bank holding company, as defined in section 2 of the Bank Holding Company Act of 1956 (12 USC 1841) or savings and loan holding company, as defined in section 10(n) of the Home Owners' Loan Act (12 USC 1467a(n))
3. A foreign financial institution established in a jurisdiction where the regulator of such institution maintains beneficial ownership information regarding such institution

Governmental or Political Type Entities:

4. A department or agency of the United States, of any State, or of any political subdivision of a State
5. Any entity established under the laws of the United States, or any State, or of any political subdivision of any State, or under an interstate compact
6. A non-U.S. governmental department, agency or political subdivision that engages only in governmental rather than commercial activities

Investment Related Type Entities:

7. Issuers of securities registered under section 12 of the Securities Exchange Act of 1934 (SEA) or that is required to file reports under 15(d) of that Act
8. An investment company, as defined in section 3 of the Investment Company Act of 1940, registered with the U.S. Securities and Exchange Commission (SEC)
9. An SEC-registered investment adviser, as defined in section 202(a)(11) of the Investment Advisers Act of 1940
10. An exchange or clearing agency, as defined in section 3 of the SEA, registered under section 6 or 17A of that Act
11. Any other entity registered with the SEC under the SEA
12. A registered entity, commodity pool operator, commodity trading advisor, retail foreign exchange dealer, swap dealer, or major swap participant, defined in section 1a of the Commodity Exchange Act, registered with the Commodity Futures Trading Commission
13. A pooled investment vehicle operated or advised by a financial institution excluded from the definition of legal entity customer under the final CDD rule

Other:

14. Any entity (other than a bank) whose common stock or analogous equity interests are listed on the New York, American, or NASDAQ stock exchange
15. Any entity organized under the laws of the United States or of any State at least 51% of whose common stock or analogous equity interests are held by a listed entity
16. Trusts except for statutory trusts. Statutory trusts are required to complete this certification. Statutory trusts are trusts registered with a Secretary of State's office or its equivalent (like a business).
17. A public accounting firm registered under section 102 of the Sarbanes-Oxley Act
18. An insurance company regulated by a State
19. A sole proprietorship
20. Unincorporated associations
21. A financial market utility designated by the Financial Stability Oversight Council under Title VIII of the Dodd-Frank Wall Street Reform and Customer Protection Act of 2010
22. Any legal entity only to the extent that it opens a private banking account subject to 31 CFR 1010.620