

**Data on Client's Beneficial Owners**

Pursuant to the Anti-Money Laundering and Counter-Terrorism Financing Act (Narodne Novine, Official Gazette of the Republic of Croatia Nos.108/2017, 39/2019 and 151/2022) HBOR is obliged to establish and verify the identity of the client's beneficial owner.

**Data on business entity:**

|  |
| --- |
| Name of business entity and legal form: |
|  |
| OIB (company identification number): |
|   |

**If the business entity is registered as a joint stock company, the shares of which are listed on the stock exchange, please state the name of the stock exchange and short code of the share. In such case, you are not obliged to continue filling in this questionnaire.**

|  |  |
| --- | --- |
| Business entity has more than 1 owner[[1]](#footnote-1) | Business entity is listed on a regulated stock exchange[[2]](#footnote-2): |
| YES [ ]  | NO [ ]  | YES [ ]  | NO [ ]  |
| Name of the stock exchange [[3]](#footnote-3)  | ISIN code of share: |
|   |   |

**Client’s beneficial owner is defined as any natural person (persons) that is ultimately the owner or controls the client or in whose name the transaction is made is deemed to be the beneficial owner of a legal entity and includes at least following persons.**

**Direct ownership includes:**

1. natural person (persons) that owns or controls a legal entity through direct ownership over a sufficient percentage of shares, including shares in bearer form, or voting rights or business shares in this legal entity. The indicator of direct ownership that a natural person has in a legal entity is the ownership of more than 25% of business shares, voting or other rights based on which it exercises its right of management of the legal entity or the ownership of 25% plus one share.

**Indirect ownership includes:**

1. natural person (persons) who exercises control over a legal entity through indirect ownership over a sufficient percentage of shares, including shares in bearer form, or voting rights or business shares in this legal entity. The indicator of indirect ownership is the ownership or control by the same natural person (persons) over one or several legal entities that individually or together have over 25% business shares or 25% plus one share in the client.

**Ownership based on control position includes:**

1. natural person (persons) with control position in the property management of a legal entity through other means. Control position in the property management of a legal entity through other means can also relate to the criteria of control used in the preparation of consolidated financial statements, e.g. shareholders’ agreement, by exercising a dominant influence and authorisation for the appointment of senior management,
2. subsidiary beneficial ownership: exists in case when there are no natural persons that would correspond to the definition of beneficial owner based on ownership or control position, and in such cases, general managers /members of the management board are deemed to be beneficial owners,
3. any natural person authorised to represent or any natural person that has a control position in the property management are deemed to be beneficial owners of domestic and legal associations and their unions, trusts, foundations, institutions, arts organisations, chambers, trade unions, association of employers, political parties, cooperatives, credit unions or religious communities.

**Owner 1**

|  |  |
| --- | --- |
| Name and family name: | Date of birth: |
|   |   |
| Country of residence: |
|   |
| Citizenship(s): |
|   |
| Type of ownership: | Percentage of ownership: |
| PLEASE SELECT |   |
| Information on political exposure[[4]](#footnote-4): | Are you a family member of a PEP[[5]](#footnote-5)? YES [ ]  NO [ ]  |
| Are you a politically exposed person (PEP)5? YES [ ]  NO [ ]  | Are you a close associate of a PEP5? YES [ ]  NO [ ]  |

**Owner 2**

|  |  |
| --- | --- |
| Name and family name: | Date of birth: |
|   |   |
| Country of residence: |
|   |
| Citizenship(s): |
|   |
| Type of ownership: | Percentage of ownership: |
| PLEASE SELECT |   |
| Information on political exposure4: | Are you a family member of a PEP5? YES [ ]  NO [ ]  |
| Are you a politically exposed person (PEP)5? YES [ ]  NO [ ]  | Are you a close associate of a PEP5? YES [ ]  NO [ ]  |

**Owner 3**

|  |  |
| --- | --- |
| Name and family name: | Date of birth: |
|   |   |
| Country of residence: |
|   |
| Citizenship(s): |
|   |
| Type of ownership: | Percentage of ownership: |
| PLEASE SELECT |   |
| Information on political exposure4: | Are you a family member of a PEP5? YES [ ]  NO [ ]  |
| Are you a politically exposed person (PEP)5? YES [ ]  NO [ ]  | Are you a close associate of a PEP5? YES [ ]  NO [ ]  |

**Owner 4**

|  |  |
| --- | --- |
| Name and family name: | Date of birth: |
|   |   |
| Country of residence: |
|   |
| Citizenship(s): |
|   |
| Type of ownership: | Percentage of ownership: |
| PLEASE SELECT |   |
| Information on political exposure4: | Are you a family member of a PEP5? YES [ ]  NO [ ]  |
| Are you a politically exposed person (PEP)5? YES [ ]  NO [ ]  | Are you a close associate of a PEP5? YES [ ]  NO [ ]  |

**Owner 5**

|  |  |
| --- | --- |
| Name and family name: | Date of birth: |
|   |   |
| Country of residence: |
|   |
| Citizenship(s): |
|   |
| Type of ownership: | Percentage of ownership: |
| PLEASE SELECT |   |
| Information on political exposure4: | Are you a family member of a PEP5? YES [ ]  NO [ ]  |
| Are you a politically exposed person (PEP)5? YES [ ]  NO [ ]  | Are you a close associate of a PEP5? YES [ ]  NO [ ]  |

**By signing this Questionnaire, I confirm that all the data contained herein are true and I authorise HBOR to verify all the data given. I undertake to inform HBOR without delay should any change occur relating to the data given above.**

|  |  |
| --- | --- |
| **Place and date** | **Name and family name of person authorised to represent and signature** |
|   |   |
| **Comment of HBOR’s employee** |
|   |

**Attachments:** Ownership table

**Appendix**

**A politically exposed person (PEP)** is any natural person who has been, or was in the past 12 months, entrusted with any of following public functions:

* president of a country or prime minister, minister, deputy minister, assistant minister or state secretary,
* elected member of a legislative body,
* member of a political party management body,
* judge of supreme court, constitutional court or another high court against whose decisions, except in exceptional cases, the right to appeal does not apply,
* member of court of auditors,
* member of a central bank council,
* ambassador, chargé d'affaires or high-ranking officer of the armed forces,
* member of the Management Board or the Supervisory Board of the State-owned enterprise or a person performing an equivalent function,
* manager, deputy manager, member of a committee or person performing an equivalent function in an international organisation and
* head of municipality, mayor, county prefect or his/her deputy elected based on the act regulating local elections in the Republic of Croatia.

**Close asociate of politically exposed person (PEP)** is any natural person who:

* who are known to have joint beneficial ownership of legal entities or legal arrangements, or any other close business relations, with a PEP or
* who is a sole beneficial owner of a legal entity or a legal arrangement which is known to have been set up for the benefit of a PEP.

**Family member of politically exposed person** is considered to be:

* a spouse of a PEP or a person with whom a PEP lives in a cohabitation or a person with whom a PEP is in a civil partnership or a person with whom a PEP is in an informal civil partnership,
* children and their spouses or persons with whom children of a PEP live in a cohabitation or persons with whom the children of a PEP are in a civil partnership or persons with whom the children of a PEP are in an informal civil partnership and
* parents of politically exposed person.
1. If HBOR's client has more than one owner, it is not necessary to fill in Ownership table. [↑](#footnote-ref-1)
2. Regulated stock exchanges are those that meet international standards (disclosure requirements are applied – the ownership structure of business entities is defined and verified by the stock exchange). Stock exchanges headquartered in EU member states and the European Economic Area, the USA, Canada and Japan also meet this standard. [↑](#footnote-ref-2)
3. It is not necessary to establish the beneficial ownership of HBOR's client listed on the regulated market. Also, it is not necessary to establish beneficial ownership of all HBOR's clients holding 25% of business interest or 25% plus one share in the party that are listed on the regulated stock exchange. [↑](#footnote-ref-3)
4. If client answers Yes to any of the questions on political exposure, please fill in Form 8 [↑](#footnote-ref-4)
5. Definition of politically exposed person and its family member and close associateis given in Appendix to this Form [↑](#footnote-ref-5)