



尊敬的客户：

Dear Valued Customer,

根据《中国人民银行关于加强反洗钱客户身份识别有关工作的通知》（银发〔2017〕第235号）（“**第235号通知**”）要求，反洗钱义务机构（下称“**义务机构**”）需加强对非自然人客户的身份识别，包括但不限于对非自然人客户受益所有人的识别。现将关于非自然人客户受益所有人识别有关的主要法规要求告知如下：

According to the requirements of *People's Bank of China Circular concerning Relevant Issues on Strengthening the Customer Identification for Anti-Money Laundering (Yin Fa [2017] No.235) (the “Circular No. 235”)*, the obligation organization of anti-money laundering (the “**Obligation Organization**”) shall strengthen the identification of the non-nature person customers, including but not limited to the identification of beneficial owners of non-natural person customers. We hereby inform you of some main regulatory requirements on identification of the beneficiary owners of non-nature person customers as follows:

1. 第235号通知第一条第三款：对非自然人客户受益所有人的追溯，义务机构应当逐层深入并最终明确为掌握控制权或者获取收益的自然人，判定标准如下：

The Article 1.3 of the Circular No. 235: For the retrospect to the beneficial owners of non-natural person customers, the Obligation Organizations shall gradually go deep and finally define the natural persons who grasp the control right or gain benefits, and the judgment standards are shown as follows:

- 1) 公司的受益所有人应当按照以下标准依次判定：直接或者间接拥有超过25%公司股权或者表决权的自然人；通过人事、财务等其他方式对公司进行控制的自然人；公司的高级管理人员。

A company's beneficial owners shall be judged by order of the following standards: Natural persons who directly or indirectly own more than 25% of the company's equity or voting rights; natural persons who take control over the company by personnel, financial or other ways; and the company's senior executives.

- 2) 合伙企业的受益所有人是指拥有超过25%合伙权益的自然人。

The beneficial owners of a partnership enterprise mean the natural persons who own more than 25% partnership equity.

- 3) 信托的受益所有人是指信托的委托人、受托人、受益人以及其他对信托实施最终有权控制的自然人。

The beneficial owners of trust mean the principals, the trustees, the beneficiaries and other natural persons who carry out final effective control over the trust.

- 4) 基金的受益所有人是指拥有超过25%权益份额或者对基金进行控制的自然人。

The beneficial owners of fund mean the natural persons who own more than 25% of the fund's equity share or other natural persons who control over the fund.

2. 第235号通知第一条第五款：义务机构应当登记客户受益所有人的姓名、地址、身份证件或者身份证明文件的种类、号码和有效期限。

The Article 1.5 of the Circular No. 235: The Obligation Organizations shall register the customer beneficial owner's name, address, identity card or identity document's type, number and valid period.



3. 第235号通知第一条第八款：义务机构应当在识别受益所有人的过程中，了解、收集并妥善保存以下

The Article 1.8 of the Circular No. 235: The Obligation Organizations shall understand, collect and properly store the following information and materials during the process of identifying the beneficial owners:

1) 非自然人客户股权或者控制权的相关信息，主要包括：注册证书、存续证明文件、合伙协议、信托协议、备忘录、公司章程以及其他可以验证客户身份的文件。

Information related to non-natural person customer's equity or control right, mainly including certificate of registration, certificate of good standing, partnership agreement, trust agreement, memorandum, the company's articles of association and other documents which might verify the customer's identity.

2) 非自然人客户股东或者董事会成员登记信息，主要包括：董事会、高级管理层和股东名单、各股东持股数量以及持股类型（包括相关的投票权类型）等。

Registration information of non-natural person customer shareholders and the members of the board of directors, mainly including list of the members of board of directors, senior executives and shareholders, quantity and type (including type of relevant voting rights) of stocks held by each shareholder, etc.

根据第235号通知的相关要求，我行需对存量客户进行排查。因此，客户经理将联系贵司并要求提供相关信息和文件，敬请知悉并予以配合。

According to the relevant requirements of the Circular No. 235, we shall review the information and documentations of the existing customers. Therefore, your Relationship Manager may contact you for your support to provide relevant information and documents. Please be aware and extend your kind cooperation.

如果有任何疑问，请联系您的花旗银行客户经理。

Please contact your Citi Relationship Manager if you have any question.

顺祝 商祺！

Best regards,

花旗银行（中国）有限公司

Citibank (China) Co., Ltd

二零一八年二月二十八日

March 1<sup>st</sup>, 2018