

Understanding ownership structure

KYC requirements – Refresh



Understanding the control and ownership structure – introduction

With today's regulatory focus on good governance and risk culture, Banks are very much accountable for knowing and understanding their customers and associated financial crime risks. Through our KYC processes we have built a framework which will help us to get to know you and your business, build a sustainable relationship and help to protect you against the potential risks of financial crime.

As part of this process your relationship team will have discussed with you the need to review the identification and verification documentation we hold on file for you – we usually refer to this as Refresh.

As your business grows and structures and trading patterns change we will regularly review the information we hold for you and ask for your help in updating it where necessary.

Sometimes it may seem like we're asking you for things that you feel we already know, you think aren't relevant, or that other banks do not ask for. To help our clients protect themselves against the threat of money laundering we have built a consistent approach to the way we perform our KYC process and believe we have a responsibility to conduct KYC in the best way possible; your support with this process is key.

Where we can, we will aim to source as much information as possible from data sources in the public domain but there will be certain information which we will need to ask you to provide.

This guide has been produced to help you understand the level of detail we require on the structure of your business; once we have the structure chart and details of the key personnel within your business this will allow us to identify the rest of the information we require. We can then work with you to gather these additional requirements and complete the process as quickly as possible.

We hope you find the information useful but should you have any additional questions please contact your Relationship Team who will be pleased to help you.



Understanding the control and ownership structure – requirements

1. We will ask you to confirm which individuals hold the most senior positions in your organisation and who ultimately exercises control and influence (i.e. the principal decision makers) within the business. Barclays commonly refers to these individuals as Key Account Parties or C-Suite, but you may be more familiar with the terms Executive Board or Executive Directors or Senior Managers/Partners depending on your business's legal form:

Examples include:

- Chairman
- Chief Executive Officer/Managing Director
- Chief Financial Officer/Finance Director
- Chief Operating Officer
- Trustee
- Bursar
- Partner

Please see the Identification and Verification table on page 5 for examples of equivalent positions for different entity types.

As a minimum we will require personal information, such as the full name, for each official holding a Key Account Party, C-Suite or equivalent position (to be provided by email or letter). In addition we will ask you for the personal details and identification for one of the officials and the personal details of a second official. A personal details form will be provided to you to collate this information.

2. In addition to the Key Account Party/C-Suite requirements, Barclays is also required to obtain specific information about individuals with a significant* controlling stake (referred to as controllers) or ownership stake (referred to as beneficial owners) in the businesses banking with us. Determining and verifying who the controllers and beneficial owners are in any business is a UK regulatory requirement which applies to all financial institutions, although each has its own risk based approach to determining the level at which a stake is considered significant.

* Barclays defines significant as being any person, listed company or government body with a direct or indirect 10% or more share of the business assets, equity or voting rights. This can be either through direct or cumulative share ownership in businesses which form part of the overall ownership structure. For the ultimate beneficial owner we may also require identification and source of wealth information in addition to the personal details provided. Your relationship team will confirm if this is required.

Understanding the control and ownership structure – requirements

3. We will initially ask you to provide a structure of your business presented in a chart (family tree) format or, described in writing (letter or email), establishing Beneficial Owners of 10% or more (please refer to appendix).

Where information is being provided by email please ensure the individual sending the email is a Key Account Party or C-Suite (or equivalent) official, or their nominated delegate, and that their email address contains the business's email identifier, for example, barclays.com.

In order to verify your structure chart we will, where possible, aim to source as much information as we can from data sources in the public domain. Where this is unavailable, independent verification may be required by either one of the following:

- In-house Legal team, where one exists (must be a qualified legal professional, customer or group appointed)
- In-house qualified Accountant
- Your external professional advisor, e.g. Solicitor/Lawyer or Accountant.

Your Relationship Team will let you know if we need to independently verify the structure chart you send to us.

4. The chart or letter provided by you needs to contain the following information:

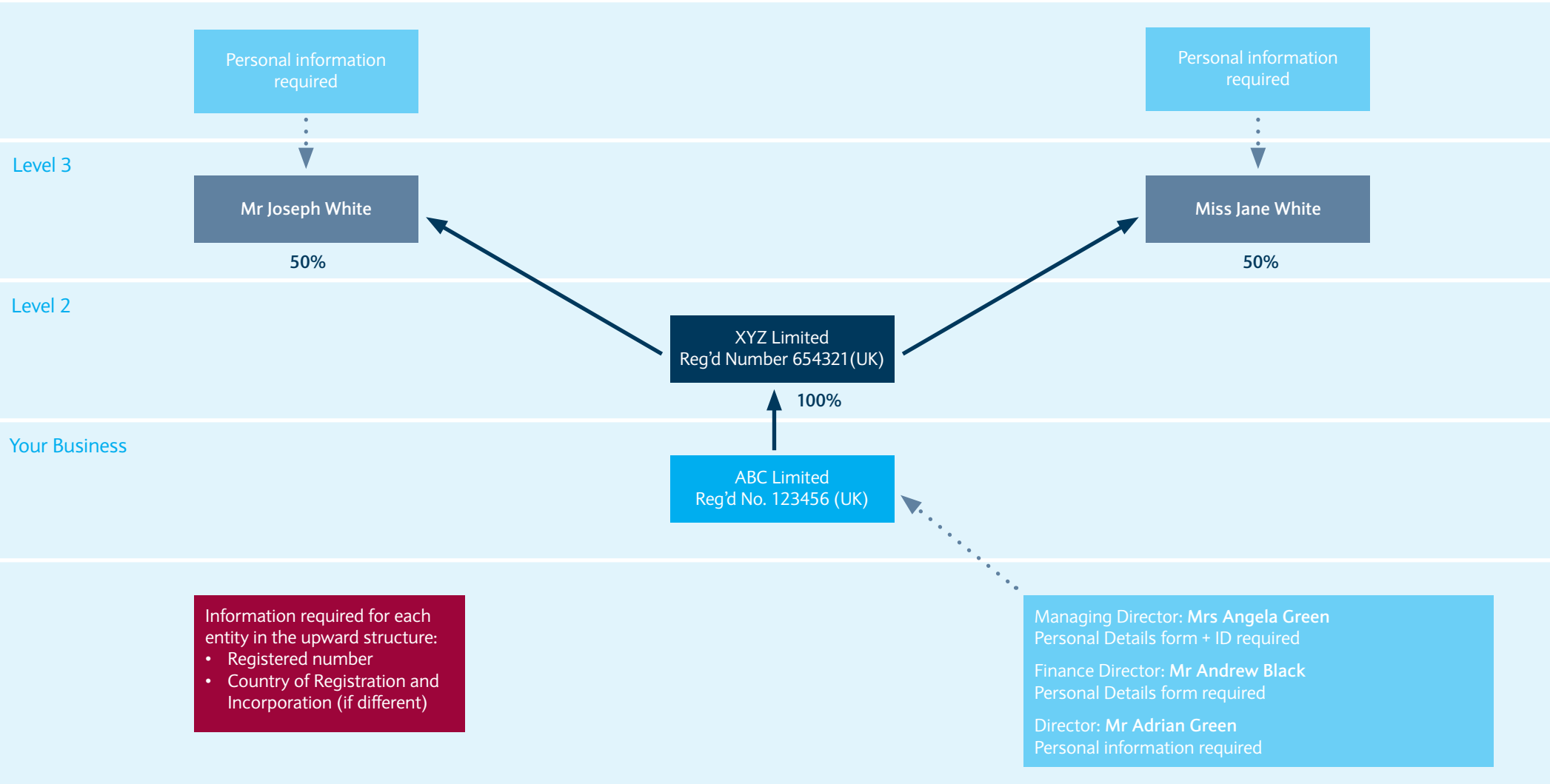
- The full name of all entities and individuals present in the upward Group structure. This includes the names of all intermediary companies and nominees (if applicable) leading up to the ultimate beneficial owner
- Country of registration and registered number (for non-UK entities)
- The full breakdown of all share capital, including all share classes (this should total 100%) at each level of the structure
- Details of any bearer instrument/certificate which forms part of your share capital, and where this does not exist today, confirmation of whether or not the firm has the ability to issue share capital in bearer form
- Details of voting control where this does not align to equity stake – for example, where different share classes exist, these should be stated together with associated voting control details.

Appendix

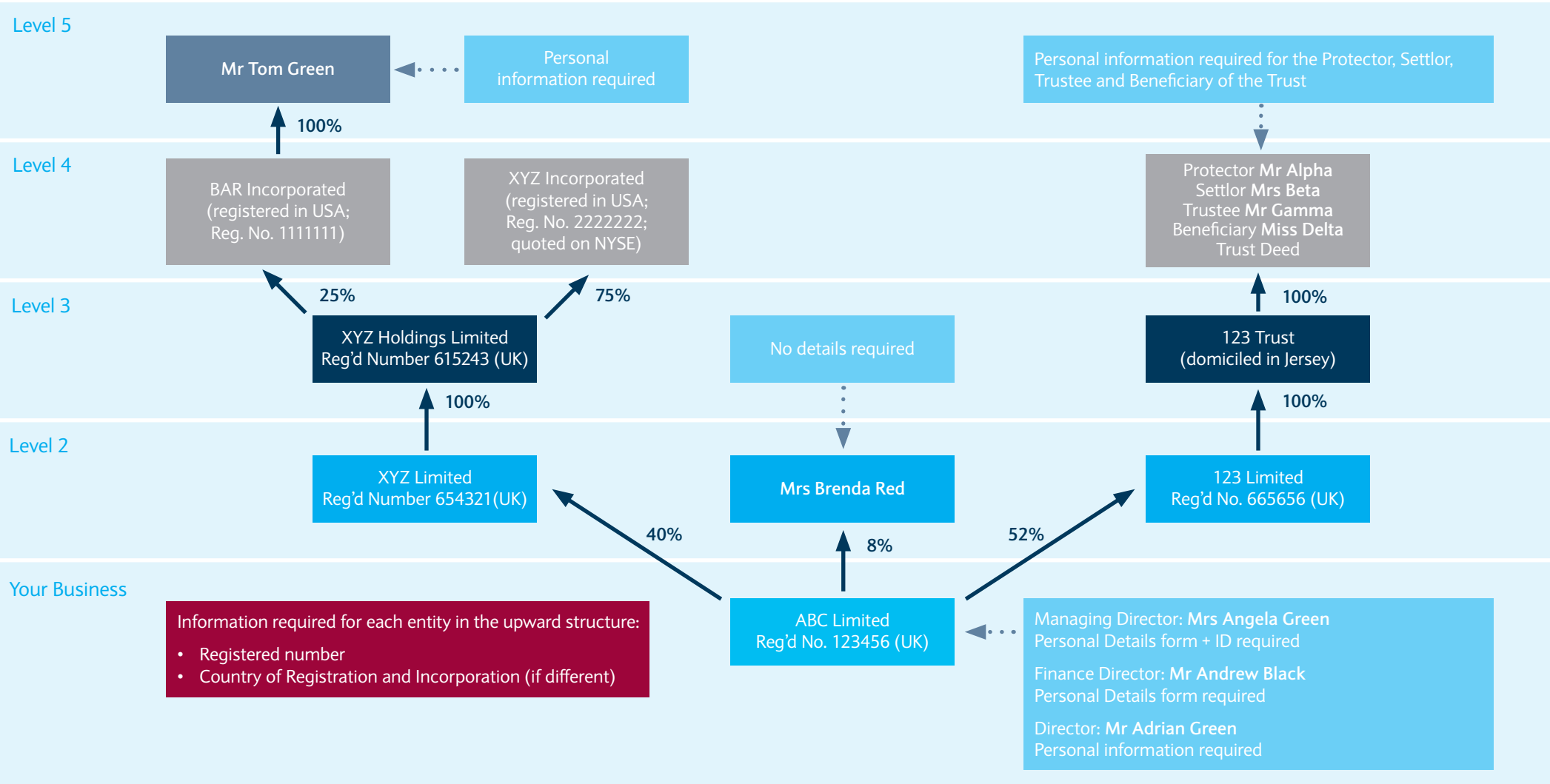
Identification and verification: Key Account Parties, C-Suite (or equivalent)

Entity Type	Examples of key officials
Educational Establishments	Head Teacher, Bursar, Chair of the Board of Governors, Principal, Chief Executive
Funds	Fund Managers, Fund Sponsor, General Partner, Fund Provider, Fund Administrator. NB. These Related Parties will often be entities, so the Key official requirement will apply to the individuals who perform the Key Official function for that entity.
Housing Associations	Senior Management or Executive Board members
Companies in Liquidation, Administration or Receivership (LARs)	Liquidators, Administrators, Receivers
Limited Liability Partnerships	Members, Senior/Executive Management board
Limited Partnerships (not a Private Equity Fund)	Partners such as General or Limited
Public Limited Companies	Chairman, Chief Executive Officer, Managing Director, Chief Financial Officer, Finance Director, Chief Operating Officer
Private Companies Limited by Guarantee	Chairman, Chief Executive Officer, Managing Director, Chief Financial Officer, Finance Director, Chief Operating Officer
Private Limited Companies	Chairman, Chief Executive Officer, Managing Director, Chief Financial Officer, Finance Director, Chief Operating Officer
Partnerships considered Corporate Entities	Partners E.g. Managing Partner, Finance Partner
Small Partnerships	Partners
Sole Traders	Proprietor
Special Purpose Vehicles	Senior Executives or Board Members such as Chief Executive Officer, Chief Financial Officer, Chief Operating Officer or persons who hold similar senior control positions
Unincorporated Trusts and Foundations	Trustees, Beneficiaries, Protector(s) and Settlor(s) of the Trust/Foundation
UK Government Bodies	Senior individuals within the organisation, eg Chairman, Chief Financial Officer, Ambassador, Vice Counsel

Example structure chart



Example structure chart



You can get this in Braille, large print or audio by calling 0800 400 100* (via Text Relay if appropriate) or by ordering online from [barclays.co.uk/accessibleservices](https://www.barclays.co.uk/accessibleservices).

*Lines are open 7 days a week, 7am to 11pm. To maintain a high quality of service we may monitor or record phone calls.

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