OWNERSHIP STRUCTURE: XYZ BANK

APPROVED: 6-5-2018 LINK

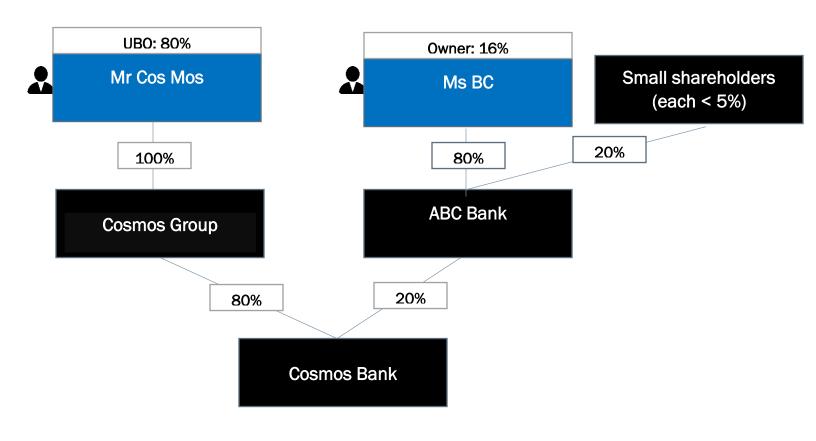


FILE SUMMARY

REPORT APPROVAL DATE	REQUESTING BANK	LAST DATA REFRESH	ASSESED PARTY	PREPARED BY
6-5-2018	ATK Bank	6-5-2018	XYZ Bank	Blacksmith CDD Analyst XXX.

SUMMARY

The client is a domestic branch of XYZ Group, with registered head office located in Singapore, a low risk country. It is engaged in providing a range of banking and financial products and services to business owners and individuals. The head office is listed on the Singapore Stock exchange, an ING recognized stock exchange, and is regulated MAS, an ING recognized regulator. XYZ Bank shares are issued in ordinary form. Approximately 55% of all XYZ Bank shares were held by major shareholders – Mr XYZ (>15%), Aetos (>5%), Anz (>5%) and Bank of America (>5%) – and private shareholders (>25%), who are mainly resident in Singapore. Approximately 45% of all XYZ Bank shares were in the hands of institutional investors. Bearer shares were initially considered as a high risk indicator however, as per MLRO advice, we have no knowledge about shareholders below 3% but such shareholders are usually not in scope of KYC.



Key: Natural Person Evidence: Link

OWNERS

OWNER	OWNERSHIP PERCENTAGE	UBO (25% THRESHOLD)	EVIDENCE
Mr Cos Mos	80%	Yes	<u>Link</u>
Ms BC	16%	No	<u>Link</u>

UBO DETAILS

FULL NAME	DATE OF BIRTH	PLACE OF BIRTH		RESIDENTIAL ADRESS		PASSPORT DETAILS	EVIDENCE
Mr Cos Mos	1-1- 1900	Singapore	Singaporean	6 Shenton Way	Unknown	Not disclosed	<u>Link</u>

STOCK EXCHANGE INFORMATION

NAME	CODE	STOCK EXCHANGE	RECOGNIZED	EVIDENCE
XYZ Bank	ABRC	Singapore Stock Exchange (SGX)	Yes	<u>Link</u>
XYZ Bank	ABRC	Indonesian Stock Exchange (IDX)	No	<u>Link</u>

TOP 20 LARGEST ORDINAIRY SHAREHOLDERS

RANK	NAME	NUMBER OF SHARES	%	SIGNIFICANT	EVIDENCE
1	Aetos	100000	9.5%	Yes	<u>Link</u>
2	ANZ	95000	9.0%	Yes	<u>Link</u>
3	Bank of America	90000	8.6%	Yes	<u>Link</u>
4	BNP Paribas	85000	8.1%	Yes	<u>Link</u>
5	Breadtalk Group	80000	7.6%	Yes	<u>Link</u>
6	CapitaLand	75000	7.1%	Yes	<u>Link</u>
7	Certis Cisco Security	70000	6.7%	Yes	<u>Link</u>
8	Changi Airport Group	65000	6.2%	Yes	<u>Link</u>
9	Citibank	60000	5.7%	Yes	<u>Link</u>
10	CPG Corporation	55000	5.2%	Yes	<u>Link</u>
11	Cushman & Wakefield	50000	4.8%	No	<u>Link</u>
12	Dairy Farm International	45000	4.3%	No	<u>Link</u>
13	DBS	40000	3.8%	No	<u>Link</u>
14	Dell	35000	3.3%	No	<u>Link</u>
15	Deloitte	30000	2.9%	No	<u>Link</u>
16	Deutsche Bank	25000	2.4%	No	<u>Link</u>
17	DHL	20000	1.9%	No	<u>Link</u>
18	Dnata	15000	1.4%	No	<u>Link</u>
19	Emerson	10000	1.0%	No	<u>Link</u>
20	Ernst & Young	5000	0.5%	No	<u>Link</u>

BEARER SHARES

NAME	BEARER SHARES	SOURCE	MITIGATIONS	EVIDENCE
XYZ Bank	No	Annual report	N.A.	Link

ALERTS

ALERT	DETAILS	PRIORITY	EVIDENCE
UBO details	Passport not disclosed	Low	<u>Link</u>
Source of wealth	Unknown	High	<u>Link</u>
Annual report	More than 2 years old	Medium	<u>Link</u>

APPENDIX

ING BANK N.V. PROFILE APPLIED

PARAMETER	VALUE
UBO threshold	25%
Singapore stock exchange = recognized source stock exchange	Yes
Indonesian stock exchange= recognized source stock exchange	No
Criteria for significant shareholding	?

SOURCE	RECOGNIZED SOURCE	APPLIED
ACRA	Yes	Yes
KYC SWIFT Registery	Yes	Yes
Company Website	Yes	Yes