

entity must identify and take reasonable measures to verify:

- (1) for a company (other than a company which is verified under the simplified company verification procedure under paragraph 4.3.8 of these Rules) or a partnership, any individual who:
  - (a) is entitled (either directly or indirectly) to exercise 25% or more of the voting rights, including a power of veto, or
  - (b) holds the position of senior managing official (or equivalent);
- (2) for a trust (other than a trust which is verified under the simplified trustee verification procedure under paragraph 4.4.8 of these Rules), any individual who holds the power to appoint or remove the trustees