

4.12.8 An AML/CTF program must include appropriate risk-based systems and controls for the reporting entity to respond to any discrepancy that arises in the course of verifying information collected about each beneficial owner so that the reporting entity can determine that it is reasonably satisfied that each beneficial owner is the person that the customer claims they are.

*Procedure to follow where unable to determine the identity of the beneficial owner*

- 4.12.9 If the reporting entity is unable to ascertain a beneficial owner, the reporting 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