

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 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);