



Deutsch-Finnische Handelskammer  
Saksalais-Suomalainen Kauppakamari  
Tysk-Finska Handelskammaren

## **Information sheet on the questionnaire for the verification of our clients and identification of the beneficial owners pursuant to the Finnish Anti-Money Laundering Act.**

The aim of our customer questionnaire is to fulfil the obligations imposed on us under the Finnish Money Laundering Act and to obtain the necessary information on the identity of our contractual partners and their ownership and control structure. Our contractual partners are subject to statutory obligations to co-operate in this respect:

*„The contractual partner of an obligated party must provide the obligated party with the information and documents required for identification. If changes occur during the course of the business relationship, the contracting party must notify the obliged entity of these changes without delay. The contracting party must disclose to the obliged entity whether it intends to establish, continue or execute the business relationship or the transaction for a beneficial owner. With the disclosure, he must also prove the identity of the beneficial owner to the obligated party.“*

In this information sheet, we would like to explain the terms "**Contact Person**", "**Beneficial Owner**" and "**Politically Exposed Person**", among others, to make it easier for you to complete our questionnaire.

### **Contact person:**

According to the Money Laundering Act, in addition to the contracting party, our employees must also identify the person acting on behalf of the contracting party in accordance with the law. This is the person who acts as the main contact person for the respective contracting party vis-à-vis DEinternational Oy. The identity details must be documented and retained. The power of attorney must be provided, unless the contact person has the legal right to represent the company, and this is shown in the trade register extract or other equivalent material.

### **Beneficial Owner:**

As DEinternational Oy, we are legally obliged to collect information about the natural person(s) behind our contractual partners (beneficial owners). According to the Money Laundering Act, a beneficial owner is any natural person who ultimately owns or controls our customer/contractual partner, or the natural person at whose instigation a transaction is ultimately carried out or the business relationship is ultimately established. This means that a legal entity can never be a beneficial owner.

In order to fulfil this identification obligation, we must therefore identify the ownership and



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control structure of our customers / contractual partners and have the names of the following natural person(s) named and confirmed:

In the case of legal entities other than foundations with legal capacity and companies that are not listed on an organised market, a beneficial owner may be:

- Any natural person at whose instigation the transaction is ultimately carried out or the business relationship is ultimately established; **and/or**
- Any natural person who directly or indirectly holds more than 25% of the capital shares in the customer and/or
- Any natural person who directly or indirectly controls more than 25 % of the voting rights **and/or**
- Any natural person who directly or indirectly exercises control in a comparable manner

**If voting rights and capital shares differ, both must be shown separately.**

**Fictional beneficial owner:**

If no natural person can be identified as the beneficial owner in accordance with the provisions of the Money Laundering Act, the legal representative/managing partner of the contractual partner is deemed to be the beneficial owner. The identification obligation also applies in this case.

**Politically exposed persons:**

"Politically exposed persons" (PEP for short) are natural persons who hold or have held a high-ranking important public office, or are an immediate family member of this person or a person known to be close to them who is to be counted among this group. Persons who hold or have held an important public office are, for example, heads of government, ministers, secretaries of state, members of parliament, members of supreme courts, members of courts of auditors or boards of directors of central banks, ambassadors, high-ranking officers of the armed forces or members of the administrative, management or supervisory bodies of state-owned enterprises. The nationality of these person(s) is irrelevant.

**Example organisation chart**

All companies that are shareholders of your company and all companies of which you are a shareholder must be noted in the organisation chart, including the following information: Percentage of ownership, commercial register number, name and country of residence.

The shareholders must be clearly shown in the organisation chart. Shareholders with a stake of less than 25% do not have to be listed.

Example:

There are three types of shareholders, 1) "Others" (which may consist of one or more shareholders with a stake of less than 25% each), 2) Mr Mustermann (shareholder of two companies) and 3) Mrs Mustermann.

Shareholder "Other" has a direct stake of 15% in Muster GmbH and therefore also an indirect stake of 7.5% of the customer company. These shareholders do not need to be identified.

Mr Mustermann holds 42.5% of the shares in the customer indirectly via Muster GmbH and 24.75% indirectly via Muster KG, i.e. a total of 67.25%, and must therefore be identified.

Mrs Mustermann indirectly holds 25.25% of the shares in the customer and must therefore also be identified.

