

## APPENDIX 1 - BENEFICIAL OWNER IDENTIFICATION FORM

### **GUIDELINES FOR IDENTIFYING THE BENEFICIAL OWNER UNDER THE BVI LEGISLATION**

#### **Who is a Beneficial Owner?**

The AML Regulations 2008 (as amended) defines a "Beneficial Owner" as the individual(s) who ultimately own(s) or control(s) the Company.

The following scenarios are intended to assist the Introducer in identifying the Beneficial Owner of the Company that ATU will be providing Registered Agent/Registered Office services to.

The "ultimate shareholder" means the final shareholder of the Company, where there is a layered shareholding.

Where the ultimate shareholder of the Company is an entity which is not listed on a recognized stock exchange.

The Beneficial Owner(s) in this scenario would be the individual(s) who ultimately owns or controls (whether directly or indirectly), ten or more percent of the shares or voting rights of the final shareholding entity.

Where the ultimate shareholder of the Company is a Nominee Shareholder.

The Beneficial Owner(s) in this scenario would be the Principal(s) with whom the nominee shareholder has entered into the nominee shareholder agreement.

Where the ultimate shareholder of the Company is a Trustee.

The controlling person(s) and consequently Beneficial Owner(s) would be:

- (i) the Trustee(s);
- (ii) the Settlor(s), unless he does not retain any power or interest in the Trust;
- (iii) the appointed Protector(s) (if applicable); and
- (iv) any Beneficiary with a vested interest in the Trust.

Where the ultimate shareholder of the Company is a Foundation.

The controlling person(s) and consequently Beneficial Owner(s) would be:

- (i) members of the Foundation Council;
- (ii) the Founder(s), unless he does not retain any power or interest in the Foundation;
- (iii) the appointed Enforcer(s) (if applicable); and
- (iv) any Beneficiary with a vested interest in the Foundation.

We, the Introducer, in accordance with the Introducer Agreement Letter in place with ATU, confirm that we have identified the Beneficial Owner(s) of [ENVOY ASSOCIATES LIMITED] (please insert name of Company) and undertake to notify ATU of any change in the Beneficial Owner(s) of the Company within 14 days of the change occurring. We also confirm that the below-mentioned information is true and correct.

#### **BENEFICIAL OWNER INFORMATION:**

*(Please complete this page for each Beneficial Owner of the Company)*

Further to the above Guidelines, please specify the capacity in which the below individual or entity is a Beneficial Owner of the Company (e.g. Trustee of the [insert name of the Trust]; ultimate beneficial owner [in the case of a nominee shareholder arrangement] etc.)

Protector of the DPK Discretionary Trust

Beneficial Owner (full name):

Olesya Voznesenskaya

Previous name(s) or alias(es) (if any):

Date of change of name (dd/mm/yyyy):

Reason for change of name:

Gender:

☐ M ☒ F

Nationality (please provide all nationalities):

Russian

Residential address:

Date of birth (dd/mm/yyyy):

Place of birth:

Is the above Beneficial Owner risk rated by the Introducer Client as high risk?

☐ Yes ☐ No

If yes, why?

DEMETRIOS A. DEMETRIADES LLC

Name of Introducer Client

22/12/2017

Date (dd/mm/yyyy)

Signature of Introducer Client

DEMETRIOS A. DEMETRIADES

Name of above signatory(ies)