

Anti-Money Laundering and Customer Identification Requirements



Important Information You Need to Know About Opening a New Account

Manning & Napier* asks customers opening accounts for certain information as a result of the passage of USA Patriot Act (Uniting and Strengthening America by Providing Appropriate Tools Required to Intercept and Obstruct Terrorism) of 2001.

To help the government fight the funding of terrorism and money laundering activities, federal law requires financial institutions to obtain, verify, and record information that identifies each person who opens an account. In certain circumstances, federal law also requires financial institutions to verify and record information that identifies the natural persons who control or beneficially own a legal entity that opens an account. For these purposes, a legal entity includes a corporation, a limited liability company, a general partnership, statutory trust, a non-profit, any other entity that is created by a filing of a public document with a Secretary of State or similar office, and any similar business entity formed in the United States.

This Notice answers some questions about Manning & Napier's Customer Identification Procedures.

What Types of Information Will I Need to Provide?

When you open an account, Manning & Napier is required to collect the following information from you (for joint account holders, this information will be required for both parties):

- Your name
- Date of birth
- Address
- Identification number
 - U.S. Citizen: Taxpayer identification number (social security number or employer identification number)
 - Non-U.S. Citizen: Taxpayer identification number, passport number, and country of issuance, alien identification card number, or government-issued identification showing nationality, residence and photograph of you.
- Identity of beneficial owners, if applicable

You may also need to show other identifying documents upon request.

Legal entities will be required to provide the above information for beneficial owners on an account. A corporation, partnership, trust or other legal entity may need to provide other information, such as its principal place of business, local office, employer identification number, certified articles of incorporation, government-issued business license, a partnership agreement, or a trust agreement. For these types of accounts an Authorizing Resolution or documentation verifying who is authorized on the account may also need to be provided.

U.S. Department of the Treasury, Securities and Exchange Commission, Financial Industry Regulatory Authority, and New York Stock Exchange rules already require you to provide most of this information. These rules also may require you to provide additional information such as your net worth, annual income, occupation, employment information, investment experience and objectives, and risk tolerance.

What Happens If I Don't Provide the Information Requested or My Identity Can't Be Verified?

Applications that do not include this required information may experience a delay in processing until the required information can be obtained. If Manning & Napier is unable to obtain the required information, the application may be rejected, or the account closed at the discretion of Manning & Napier.

We thank you for your patience and hope that you will support us in our efforts to deny terrorists and money launderers access to America's financial system.

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