



## **Customer Identification Notice**

The USA PATRIOT Act is designed to detect, deter, and punish terrorists in the United States and abroad and imposes anti-money laundering (“AML”) requirements on brokerage firms and/or other entities that are defined as financial institutions. Under the Act’s provisions, all brokerage firms are required to have comprehensive AML programs. As part of Vining Sparks’ AML program, we may ask you to provide various identification information or documentation prior to effecting any transactions with your organization.

### **Important Information You Need to Know About Opening a New Institutional Account with Vining Sparks**

At a minimum we will ask (1) your entity name; (2) the physical address of your principal place of business (headquarters) and local office; (3) the employer identification number (“EIN”) for the corresponding entity named on the new account.

In addition, Vining Sparks may verify the identity of an entity through documentary evidence and may request one of the following documents: (1) certified articles of incorporation; (2) a government-issued business license; (3) a partnership agreement; (4) a trust instrument; (5) any other document showing the existence of the entity. Vining Sparks also reserves the right to verify an entity’s identity through non-documentary methods. Vining Sparks may: (1) contact the entity; (2) independently verify the entity through a public or vendor database; (3) check references with other financial institutions; (4) obtain a financial statement such as an audited financial statement; or (5) check the existence of the entity with its primary regulator.

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