



## News Bulletin

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| <b>Date</b>    | <b>May 18<sup>th</sup> 2018</b>   |
| <b>Subject</b> | <b>FinCEN Reminds Financial Institutions that the CDD Rule (UBO) Becomes Effective on May 11<sup>th</sup>, 2018 and issues New Administrative Rulings</b> |

The Financial Crimes Enforcement Network (“FinCEN”) reminds financial institutions and their customers that the final rule, [“Customer Due Diligence Requirements for Financial Institutions”](#) (the CDD Rule) becomes effective on **May 11<sup>th</sup>, 2018**.

FinCEN issued the CDD Rule, which amends Bank Secrecy Act regulations, to improve financial transparency and prevent criminals and terrorists from misusing companies to disguise their illicit activities and launder their ill-gotten gains.

**FinCEN:** [Full Reminder](#) Web Page

**FinCEN:** [CDD Final Rule](#) Document

### Administrative Rulings

#### **A. Administrative Ruling: Premium Finance Cash Refunds and Beneficial Ownership Requirements for Legal Entity Customers**

**May 11, 2018:** The Financial Crimes Enforcement Network (FinCEN) is issuing this ruling to provide exceptive relief to covered financial institutions with respect to the application of the Beneficial Ownership Requirements for Legal Entity Customers (31 CFR § 1010.230) (Beneficial Ownership Rule) to premium finance lending products that allow for cash refunds.

**FinCEN:** [Administrative Ruling](#) Web Page

#### **B. Administrative Ruling: Beneficial Ownership Requirements for Legal Entity Customers of Certain Financial Products and Services with Automatic Rollovers or Renewals**

**May 16, 2018:** The Financial Crimes Enforcement Network (FinCEN) issued an administrative ruling today to provide a 90-day limited exceptive relief to covered financial institutions from the obligations of the Beneficial Ownership Requirements for Legal Entity Customers (Beneficial Ownership Rule) with respect to certain financial products and services that automatically rollover or renew (i.e., certificate of deposit (CD) or loan accounts) and were established before the rule’s applicability Date, May 11, 2018.

**FinCEN:** [Administrative Ruling](#) Web Page



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If you have any questions please contact your Client Services or Relationship Manager or our Support Help Desk via e-mail to: [sw.support@cubeiq.gr](mailto:sw.support@cubeiq.gr).

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