

CUSTOMER ACCOUNT POLICY

IMPORTANT INFORMATION ABOUT PROCEDURES FOR OPENING A NEW ACCOUNT

To help the government fight the funding of terrorism and money laundering activities, Federal law requires all financial institutions to obtain, verify, and record information that identifies each account (whether it be an entity or person) and those with beneficial ownership, both direct and indirect, including individuals who have control over the account.

What this means is, when you open an account, we will, for identification requirements, ask for the full name of the entity, legal and mailing address, tax identification number and certain documentation that includes, but not limited to, a government-issued form of identification, if not readily available via public means, showing the legal existence of the entity. Other identification may include certified articles of incorporation, a business license, a partnership or trust agreement. Furthermore, we may ask for the name(s) of those who are beneficial owners, both direct and indirect. Finally, we will require information about individuals with authority or control over such accounts, including signatories, in order to verify the customer's identity.

For individuals, we would require a non-expired government-issued form of identification evidencing the customer's nationality, residence, that includes a photograph or similar safeguard. Typical examples of identification may include a passport and/or driver's license. Other documents for entities/individuals may be provided and/or requested depending on the type of account and customer's category of business. Updating and/or refreshing those documents will occur from time to time pursuant to regulatory requirements.

Epoch Investment Partners, Inc. will on occasion verify account information in compliance with regulatory requirements. Contact your representative if you have any concerns about requests for information that you may receive from **Epoch Investment Partners, Inc.**. Member of FINRA and SIPC.