

CUSTOMER IDENTIFICATION

Important information about Customer Identification Program (CIP) procedures: To help the United States 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 person who maintains an account with Northland. New customer accounts are subject to CIP reviews mandated under anti-money laundering rules.

Under the CIP rule and for purposes of this section, "customer" is defined as:

- A person that opens a new account.
- An individual who opens a new account for:
 - An individual who lacks legal capacity; or,
 - An entity that is not a legal person.

"Customer" does not include a financial institution regulated by a Federal regulator; a bank regulated by a state bank regulator; those exempted under Federal rule include municipalities; or a person with an existing account at NSI, providing there is reasonable belief that the true identity of the person is known.

What this means for you: We will ask you for your name, address, date of birth, and other information that will allow us to identify you. We will also ask to see your driver's license or other identifying documents for new or existing accounts.

When completing Northland's New Account Application, the following CIP (Customer Identification Program) information is required, based upon SEC and U.S. Treasury Joint Notice 31 CFR Part 103, regarding Client Identification Programs.

For individual customers, Northland will require the client to provide the following information located on a government issued ID for its CIP procedures:

- 1) Government-Issued Identification Number
- 2) Type of Government ID used (i.e. U.S. passport, Driver's License, State ID, etc.)
- 3) Location of Issuance of ID
- 4) Date of Issuance of ID
- 5) Date of Expiration of ID

This required information is in addition to the SEC Rule 17(a)(3)(a)(17) requirements requested on the Northland New Account Application. Possible sources of the government-issued ID include a physical pictured document, such as a driver's license, passport, state government identification, or an alien registration card.

If an account cannot be identified with the usual documentation listed above, the Compliance department has determined that non-documentary accounts may be verified by the following:

- Information from a consumer reporting agency or other database

Northland is required to identify all accounts pursuant to the CIP procedures and ensure that the customer is not listed on any government watch lists.