

ENTITY SELF-CERTIFICATION FORM – APPENDIX

General Instructions

- If you are an individual, do not complete this form. Instead complete an “Individual Self-certification Form”.
- Entities that are US Persons always need to submit an IRS form W-9 as well. If you are required to provide Controlling Persons information in Section 4, when the Controlling Person is a US citizen/ US passport holder and/or resident in the US for tax purposes (green card holder or resident under the substantial presence test), an IRS form W-9 must be completed and attached. If the Controlling Person is no longer a US citizen, a certificate of loss of nationality of the United States and a copy of the foreign passport must be provided. The W-9/certificate of loss of nationality/copy of foreign passport, however, do not have to be provided if any of 3A (a), 3A (b) (No), 3C, 3H, or 3I in the Entity Classification Section was selected.
- All Entities must complete the relevant parts in Sections 1, 2, 3 and 5. Entities classified or treated as Passive NFE/Passive NFFEs, including “managed by” type Investment Entities in non-participating Common Reporting Standard (“CRS”) jurisdictions must complete Section 4. Failure to complete all the required Sections will result in non-acceptance of the Entity Self-Certification Form.
- In the event of a change of circumstances which would render the self-certification inaccurate or incomplete, the Entity must provide an updated self-certification in 30 days.

Definitions under the various AEOI regimes may differ. We are not authorised to give tax advice. If you have any questions about this form, these instructions, defining your tax residency status or determining your AEOI classification, review the applicable AEOI Regulations and speak to your tax advisor. Any information provided in this document is not considered a substitute for professional advice.

You can find more information on the AEOI regimes in the websites below and the websites of your local tax authorities:

- FATCA: <https://www.irs.gov/Businesses/Corporations/Foreign-Account-Tax-Compliance-Act-FATCA>
- OECD CRS: <http://www.oecd.org/tax/automatic-exchange/>
- EU 2011 Directive (EU DAC 2):
https://taxation-customs.ec.europa.eu/taxation-1/tax-co-operation-and-control/general-overview/enhanced-administrative-cooperation-field-direct-taxation_en

Specific Instructions

1. Entity Identification

- Line 1** Enter the legal name of the Entity. If the account was opened in the registered name of an Entity that is considered a ‘disregarded entity’ for US tax purposes, please note that this does not carry forward to AEOI regimes, and the form should be completed in the name of such registered account holder. When you complete this form on behalf of a branch of an entity please provide the information for the branch in this section.
- Line 2** If you are a corporation, enter your country of incorporation. If you are another type of Entity, enter the country under whose laws you are created, organized, or governed.
- Line 3** This is typically the address appearing in the Entity’s organizational documents.
- Line 4** Enter the mailing address only if it is different from the registered address on line 3.

2. Country of Tax Residence and related Taxpayer Identification Number

The Entity must disclose all of its tax residencies, and the required information for each jurisdiction. In the event you are completing this form on behalf of a branch, the tax residence declared in this section should be that of the head office of the legal entity.

If you are unsure about the tax residency of the Entity, consult your tax advisor. However in very general terms an Entity’s residence is where it is resident for tax purposes. There may be special rules under AEOI regimes where an Entity (other than a trust) does not have a residence for tax purposes (e.g. because it is treated as fiscally transparent, or it is located in a jurisdiction that does not have an income tax). In these cases the Entity may be treated as resident in the jurisdiction in which it is incorporated under the laws of, has its place of management, or where it is subject financial supervision.

In the case of a trust, it may be considered to be resident in the jurisdiction where one or more of its trustees are resident.

All the considerations above should be reviewed in light of the local legislation and AEOI guidance applicable to the Entity.

If the Entity’s country of residence for tax purposes has issued it a TIN or functional equivalent, enter it here. If the Entity is tax resident in a country that generally issues TINs but you are unable to provide one for the Entity, please explain why the Entity does not have a TIN or functional equivalent. If the Entity is tax resident in a country that does not issue TINs or functional equivalents, no explanation is required.

Additional requirements:

- US Persons – US Persons must provide a complete and signed W 9 form.
- Non-US Entities that are Foreign Financial Institutions for FATCA must complete the GIIN declaration. Generally Non-US Entities classified as FIs under FATCA must register in the Internal Revenue Service (“IRS”) website to obtain a GIIN.

Certain types of Non-US FIs do not have to obtain a GIIN and should disclose the reason or FATCA classification by selecting the appropriate option. All sponsored investment entities need an own GIIN as of 1.1.2017, however some model 1 IGA’s provide an exception that sponsored investment entities only must obtain an own GIIN by the later of 90 days after a US reportable account is identified or January 1 2017. In that case the model 1 IGA sponsored investment entity must communicate the own GIIN immediately to the recipient of this self-certification. Sponsored Closely Held Investment Vehicles and Trustee Documented Trusts never need an own GIIN as they are certified deemed compliant under US FATCA regulations. For further information on the FATCA classifications that do not require a GIIN, consult the Definitions section and your tax advisor. If you are completing this form on behalf of a branch of a legal entity please provide the GIIN of the branch.

3. Entity Classification

General instructions

Regardless of the jurisdiction of residence, all Entities must be classified under AEOI regimes, including Entities that are organized or resident in the US. **It is possible that an Entity may have a different classification under one or more of the AEOI regimes.**

Note: Entities with GIIN-holding FATCA classifications such as ‘IGA Partner jurisdiction FI’, ‘Registered Deemed Compliant FI’, ‘Participating FI’ etc. will be requested to provide their GIIN only in the GIIN Declaration Section. Although such ‘GIIN holding’ sub-classifications will not be requested or required within this form, please ensure to complete the Financial Institution Section, Options A-C in addition.

For CRS a separate classification process is required so please establish whether the Entity is a **Financial Institution** or **Non-Financial Entity**, then proceed as instructed.

“Financial Institution”

The term “Financial Institution” means a “Custodial Institution”, a “Depository Institution”, an “Investment Entity”, or a “Specified Insurance Company”. For FATCA only it may also mean a Holding and Treasury Centre, see detailed information in the Definitions section further below. See the relevant domestic guidance and the CRS for further classification definitions that apply to Financial Institutions.

“Non-Financial Entity” or “NFE” [CRS] (includes “Non-Financial Foreign Entity” or “NFFE” [FATCA])

An “NFE” is any Entity that is not a Financial Institution.

Financial Institutions

Option A: Investment Entity (FATCA IGA)

An Investment Entity is an Entity that conducts as a business, or is managed by an Entity that conducts as a business, one or more of the following activities, for or on behalf of a customer (“Investment Entity Activities”):

- trading in money market instruments (cheques, bills, certificates of deposit, derivatives etc.), foreign exchange, interest rate and index instruments, transferable securities and commodity futures trading;
- individual and collective portfolio management;
- otherwise investing, administering or managing funds or money on behalf of other persons.

This definition should be interpreted in a manner consistent with similar language set forth in the definition of ‘financial institution’ in the Financial Action Task Force Recommendations.

Various governments that have published guidance notes to assist industry participants have indicated that any Entity holding itself to be a Collective Investment Vehicle will be treated as an Investment Entity as its investors are deemed to be customers, and hence a Financial Institution for AEOI purposes.

CRS introduces an additional requirement for an Entity to be an Investment Entity FFI (“Gross Income Test”).

The Gross Income Test is met if 50% or more of the Entity’s gross income during the last 3 calendar years or shorter period that the Entity was in existence derives from:

- Investment Entity Activities listed above, for Entities carrying such activities, or;
- Investing, reinvesting or trading in Financial Assets, if the Entity is managed by a Financial Institution.

In case an Investment Entity does not meet the Gross Income test under CRS, it would be an NFE for CRS purposes and needs to be classified either as Active or Passive NFE. If it is classified for CRS as a Passive NFE, the Entity’s Controlling Persons must be listed in Section 4. For FATCA the Entity will continue to have its separate FATCA classification as Investment Entity Financial Institution.

Investment Entity – selecting A) or B)

OECD CRS distinguishes between Investment Entities in participating versus non-participating jurisdictions. “Managed by another Financial Institution” Investment Entities in non-participating jurisdictions for OECD CRS purposes must disclose information about Controlling Persons.

A “**Managed by another Financial Institution**” Investment Entity in a non CRS participating jurisdiction (e.g. USA) is treated as a Passive NFE for CRS and hence it must disclose its Controlling Persons in Section 4. The Entity will for FATCA purposes continue to have its separate FATCA classification as e.g. US Person or Investment Entity/Financial Institution.

Option B: Depository Institution, Custodial Institution, Specified Insurance Company

"Depository Institution"

The term "Depository Institution" means any Entity that accepts deposits in the ordinary course of banking or similar business, and regularly engages in one or more of the following activities:

- Provision of credit through personal, mortgage, industrial or other loans or other extensions of credit;
- Purchases, sells, discounts or negotiates of accounts receivable, instalment obligations, notes, drafts, cheques, bills of exchange, acceptances, or other evidence of indebtedness;
- Issues letters of credit and negotiates drafts drawn thereunder;
- Provides trust or fiduciary services;
- Finances foreign exchange transactions; or
- Enters into, purchases, or disposes of finance leases or leased assets.

"Custodial Institution"

A "Custodial Institution" is any Entity that earns a substantial portion (at least 20 percent) of its gross income from the holding of financial assets for the accounts of others and from related financial services. This test applies to the last three accounting periods or the period since commencement, if shorter.

Related financial services include any service which is directly related to the holding of assets by the institution on behalf of others and includes: custody, account maintenance and transfer fees; execution and pricing commission and fees from securities transactions; income earned from extending credit to customers; income earned from contracts for difference and on the bid-ask spread of financial assets; and fees for providing financial advice, clearance and settlement services.

Such institutions could include for example brokers, custodial banks, trust companies and clearing organizations.

"Specified Insurance Company"

An insurance company is a Specified Insurance Company when the products written are classified as Cash Value Insurance or Annuity Contracts or if payments are made with respect to such contracts.

Insurance companies that only provide General Insurance or term Life Insurance should not be Financial Institutions under this definition and neither will reinsurance companies that only provide indemnity reinsurance contracts. A Specified Insurance Company can include both an insurance company and its holding company. However, the holding company itself will only be a Specified Insurance Company if it issues or obligated to make payments with respect to Cash Value Insurance Contracts or Annuity Contracts.

Option C: Holding Company or Treasury Center

This is a FATCA classification and acceptable only in non-IGA countries or certain IGA countries (Malta) that have adopted this definition under their local FATCA guidance or that allow for the use of regulations found in the US Regulations (Netherlands) by way of an option. UK and Ireland have abandoned this FI category in 2015 but still accept this classification for Entities classified as such based on the superseded guidance under such jurisdictions.

The Entity will need to be classified separately for CRS as another type of Financial Institution (see Options A to B under the Financial Institutions subsection) or NFE by selecting the applicable CRS classification (see Options D to G under the Non-Financial Entities subsection). If it is classified for CRS as a Passive NFE, the Entity's Controlling Persons must be listed in Section 4. For FATCA the Entity will continue to have its separate FATCA classification as Holding and Treasury Centre FI.

Non-Financial Entities

Options D through I: Non-Financial Institutions

These categories apply to Entities classified as Non-Financial Entities under one or more AEOI regimes including FATCA and CRS.

When the Entity is not an Active NFE, it will be a Passive NFE.

Active NFE's

Active NFE's should further classify themselves under D, E or F as indicated.

Active NFE's that select F should indicate which sub type of Active NFE they are (I-VI). The codes for "Active NFE" sub type are as follows:

- I. **Less than 50% passive income/assets:** less than 50% of the NFE's gross income for the preceding calendar year or other appropriate reporting period is Passive Income (see next definitions section) and less than 50% of the assets held by the NFE during the preceding calendar year or other appropriate reporting period are assets that produce or are held for the production of Passive Income;
- II. **Holding/Financing non-FI subsidiaries:** substantially (80% or more) of the activities of the NFE consist of holding (in whole or in part) the outstanding stock of, or providing financing and services to, one or more subsidiaries that engage in trades or businesses other than the business of a Financial Institution, except that an Entity does not qualify for this status if the Entity functions (or holds itself out) as an investment fund, such as a private equity fund, venture capital fund, leveraged buyout fund, or any investment vehicle whose purpose is to acquire or fund companies and then hold interests in those companies as capital assets for investment purposes;
- III. **Start-up NFE:** the NFE is not yet operating a business and has no prior operating history, but is investing capital into assets with the intent to operate a business other than that of a Financial Institution, provided that the NFE does not qualify for this exception after the date that is 24 months after the date of the initial organisation of the NFE;
- IV. **Liquidating NFE:** the NFE was not a Financial Institution in the past five years, and is in the process of liquidating its assets or is reorganising with the intent to continue or recommence operations in a business other than that of a Financial Institution;
- V. **Financing/hedging NFE of non-FI Related Entities:** the NFE primarily (50% or more) engages in financing and hedging transactions with, or for, Related Entities that are not Financial Institutions, and does not provide financing or hedging services to any Entity that is not a Related Entity, provided that the group of any such Related Entities is primarily (50% or more) engaged in a business other than that of a Financial Institution; or

- VI. **Non-Profit NFE:** the NFE meets all of the following requirements:
- it is established and operated in its jurisdiction of residence exclusively for religious, charitable, scientific, artistic, cultural, athletic, or educational purposes; or it is established and operated in its jurisdiction of residence and it is a professional organisation, business league, chamber of commerce, labour organisation, agricultural or horticultural organisation, civic league or an organisation operated exclusively for the promotion of social welfare;
 - it is exempt from income tax in its jurisdiction of residence;
 - it has no shareholders or members who have a proprietary or beneficial interest in its income or assets;
 - the applicable laws of the NFE’s jurisdiction of residence or the NFE’s formation documents do not permit any income or assets of the NFE to be distributed to, or applied for the benefit of, a private person or non-charitable Entity other than pursuant to the conduct of the NFE’s charitable activities, or as payment of reasonable compensation for services rendered, or as payment representing the fair market value of property which the NFE has purchased; and
 - the applicable laws of the NFE’s jurisdiction of residence or the NFE’s formation documents require that, upon the NFE’s liquidation or dissolution, all of its assets be distributed to a Governmental Entity or other non-profit organisation, or escheat to the government of the NFE’s jurisdiction of residence or any political subdivision.

Note: Certain Entities (such as US Territory NFFEs, Direct Reporting NFFEs and Excepted Inter-affiliate FFIs) may qualify for Active NFFE status under FATCA but not Active NFE status under the CRS or EUDAC2.

Passive NFE’s

Entities classified or treated as Passive NFE/Passive NFFEs include “managed by” type Investment Entities in non-participating Common Reporting Standard (“CRS”) jurisdictions that select section 3A(a); Investment Entities that select Section 3A(b) option “no”; and Entities that select Passive NFE in section 3G (including Holding and Treasury Centre Entities that select 3C and 3G). These entities must complete Section 4 where indicated. Failure to complete all the required Sections will result in non-acceptance of the Entity Self-Certification Form.

Direct Reporting Non-Financial Foreign Entities (3H) and Sponsored Direct Reporting Non-Financial Foreign Entity (3I) are also classified for CRS as Passive NFE and must provide Controlling Persons data in Section 4 as indicated.

Consult the Definitions section and your tax advisor for details on each classification.

4. Controlling Persons

The threshold % for controlling persons depends on the law and regulations of the jurisdiction of the FI with which you are opening an account (e.g. 10% or more).

An Entity classified as Passive NFE under any AEOI regimes must provide Controlling Person information in Section 4 including the percentage (%) of direct or indirect ownership for any “A” type of Controlling Persons. All Controlling Person information is mandatory. The codes for “Type of Controlling Person” are as follows:

- A. CP of legal person – ownership (+ indicate % of ownership)
- B. CP of legal person – other means
- C. CP of legal person – senior managing official
- D. CP of legal arrangement – trust – settlor
- E. CP of legal arrangement – trust – trustee
- F. CP of legal arrangement – trust – protector
- G. CP of legal arrangement – trust – beneficiary
- H. CP of legal arrangement – trust – other
- I. CP of legal arrangement – other – settlor-equivalent
- J. CP of legal arrangement – other – trustee-equivalent
- K. CP of legal arrangement – other – protector-equivalent
- L. CP of legal arrangement – other – beneficiary-equivalent
- M. CP of legal arrangement – other – other-equivalent

For the purposes of the codes above:

- “Legal person” includes corporations and partnerships.
- “Legal arrangement” includes trusts or foundations.

Consult your professional advisor if you are unsure of whether the Entity is a legal person or legal arrangement.

Additional information regarding Controlling Persons can be found in the Definitions section below.

5. Declaration and Signature

It is mandatory to include the print name of signer, position/title, date and signature.

Typically the following persons are authorized to sign, but this should be confirmed in the bylaws or equivalent corporate document or with legal counsel assistance:

- Corporations: directors, or other individuals expressly authorized to sign tax related documents under a power or attorney;
- Branches: duly appointed branch managers or directors of the (head office) entity to which the branch belongs;
- Limited Partnerships: legal representative of the general partner;
- Trusts: Trustee;
- Foundation: Director.

Definitions

The definitions below are summarized from the various AEOI regimes. In some instances we have highlighted differences between AEOI regimes, but the Definitions below are not meant to provide complete and final advice on the application to a particular Entity.

Where applicable, we have highlighted the definitions that do not apply to all AEOI regimes.

“Active Non-Financial Entity” or “Active NFE” [CRS & FATCA]

An Entity will be classified as Active NFE if it meets any of the following criteria:

- less than 50% of the NFE’s gross income for the preceding calendar year or other appropriate reporting period is Passive Income (see next definition) and less than 50% of the assets held by the NFE during the preceding calendar year or other appropriate reporting period are assets that produce or are held for the production of Passive Income;
- the stock of the NFE is regularly traded on an established securities market or the NFE is a Related Entity of an Entity the stock of which is regularly traded on an established securities market;
- the NFE is a Governmental Entity, an International Organisation, a Central Bank, or an Entity wholly owned by one or more of the foregoing;
- substantially all of the activities of the NFE consist of holding (in whole or in part) the outstanding stock of, or providing financing and services to, one or more subsidiaries that engage in trades or businesses other than the business of a Financial Institution, except that an Entity does not qualify for this status if the Entity functions (or holds itself out) as an investment fund, such as a private equity fund, venture capital fund, leveraged buyout fund, or any investment vehicle whose purpose is to acquire or fund companies and then hold interests in those companies as capital assets for investment purposes;
- the NFE is not yet operating a business and has no prior operating history, (a “start-up NFE”) but is investing capital into assets with the intent to operate a business other than that of a Financial Institution, provided that the NFE does not qualify for this exception after the date that is 24 months after the date of the initial organisation of the NFE;
- the NFE was not a Financial Institution in the past five years, and is in the process of liquidating its assets or is reorganising with the intent to continue or recommence operations in a business other than that of a Financial Institution;
- the NFE primarily engages in financing and hedging transactions with, or for, Related Entities that are not Financial Institutions, and does not provide financing or hedging services to any Entity that is not a Related Entity, provided that the group of any such Related Entities is primarily engaged in a business other than that of a Financial Institution; or
- the NFE meets all of the following requirements (a “non-profit NFE”) :
 - it is established and operated in its jurisdiction of residence exclusively for religious, charitable, scientific, artistic, cultural, athletic, or educational purposes; or it is established and operated in its jurisdiction of residence and it is a professional organisation, business league, chamber of

- commerce, labour organisation, agricultural or horticultural organisation, civic league or an organisation operated exclusively for the promotion of social welfare;
- it is exempt from income tax in its jurisdiction of residence;
 - it has no shareholders or members who have a proprietary or beneficial interest in its income or assets;
 - the applicable laws of the NFE’s jurisdiction of residence or the NFE’s formation documents do not permit any income or assets of the NFE to be distributed to, or applied for the benefit of, a private person or non-charitable Entity other than pursuant to the conduct of the NFE’s charitable activities, or as payment of reasonable compensation for services rendered, or as payment representing the fair market value of property which the NFE has purchased; and
 - the applicable laws of the NFE’s jurisdiction of residence or the NFE’s formation documents require that, upon the NFE’s liquidation or dissolution, all of its assets be distributed to a Governmental Entity or other non-profit organisation, or escheat to the government of the NFE’s jurisdiction of residence or any political subdivision.

Note: Certain Entities (such as US Territory NFFEs, Direct Reporting NFFEs and Excepted Inter-affiliate FFIs) may qualify for Active NFFE status under FATCA but not Active NFE status under the CRS or EUDAC2.

“Certified Deemed-Compliant Financial Institution” [FATCA]

The US FATCA Regulations provide for five categories of Certified Deemed-Compliant Financial Institutions. For further information, refer to the US FATCA Regulations:

- Non registering local banks
- FFIs with Only Low-Value Accounts
- Sponsored, Closely Held Investment Vehicles
- Limited Life Debt Investment Entities
- Investment Advisors and Investment Managers
- Owner-Documented FFIs (“ODFI”) – This status is not accepted. ODFI status only applies in relation to the account with the FI or US withholding agent which has agreed to report any US specified person to the IRS and not automatically to any other account with another FI. ODFI status is not offered to by the account holders of the FI by which this self-certification is used thus such FFIs must either be sponsored, trustee-documented or provide their own GIIN. Please consult your tax advisor.”

In addition, a Certified Deemed-Compliant Financial Institution also includes a Non-reporting FFI under a Model 1 IGA and a Non reporting FFI treated as a Certified Deemed-Compliant FFI under a Model 2 IGA. Refer to Annex II of the relevant IGA for further information.

“Common Reporting Standard” or “CRS” [CRS only]

The Common Reporting Standard (CRS), developed in response to the G20 request and approved by the OECD Council on 15 July 2014, calls on jurisdictions to obtain information from their financial institutions and automatically exchange that information with other jurisdictions on an annual basis. It sets out the financial account information to be exchanged, the financial institutions required to report, the different types of

accounts and taxpayers covered, as well as common due diligence procedures to be followed by financial institutions. For more info see <http://www.oecd.org/tax/automatic-exchange/>

“Controlling Person(s)”

The term “Controlling Persons” must be interpreted in line with the term “beneficial owner” as described in Recommendation 10 and the Interpretive Note of Recommendation 10 contained in the 2012 FATF Recommendations.

“Controlling Persons” are the natural person(s) who exercise control over an Entity. Where that Entity is treated as a Passive NFE then a Financial Institution is required to determine whether or not these Controlling Persons are Reportable Persons.

“Control” over an Entity is exercised by the natural person(s) who:

- Directly or indirectly have a controlling **ownership interest** or **voting rights** (typically on the basis of a certain percentage, e.g. 10%) in the Entity. The percentage depends on the legislation applicable to the FI where the account is opened and is mostly linked to KYC/AML legislation.
- This includes individuals who exercise control together with other individuals including through any contract, understanding, relationship, or via an intermediary, use of nominee shareholders or tiered entity e.g. through a shareholder’s agreement, exercise of dominant influence or power to appoint senior management (a majority interest approach). Where no natural person(s) exercises control through ownership interests, the Controlling Person(s) of the Entity will be the natural person(s) who exercises control of the Entity through **other means**.

This includes natural persons(s) who do not themselves have ownership of the Entity, but exert control through other means such as personal connections to persons with ownership or voting rights.

This control may also arise through close and intimate family relationships, historical or contractual associations, or participation in financing of the enterprise (including guaranteeing debt in case the entity defaults). Furthermore control may be presumed even if it is never actually exercised (i.e., the natural person is using, enjoying or benefiting from the assets owned by the Entity).

- Where no natural person(s) is/are identified as exercising control of the Entity through ownership interests or through other means, then the Controlling Person is deemed to be the natural person who holds the position of senior managing official.

This includes natural person(s) responsible for strategic decisions that fundamentally affect the business practices or general direction of the Entity, or that exercise executive control over the daily or regular affairs of the Entity.

Examples include a CEO, CFO, managing or executive director or president, or natural person(s) who have significant authority over a legal person’s financial relationship (including with financial institutions that hold accounts on behalf of a legal person) and the outgoing financial affairs of the legal person.

The preceding measures are cascading measures, with each to be used where the previous measure has been applied and has not identified a beneficial owner.

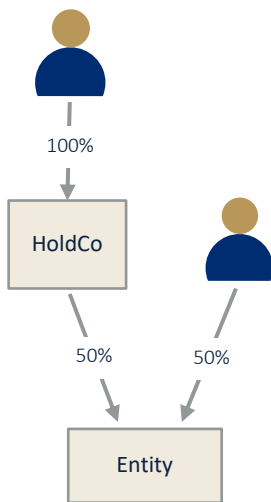
Financial institutions resident in certain jurisdiction must apply ownership or voting rights thresholds lower than 25%. Please consult your professional advisor if you are unsure about the threshold in the FI’s jurisdiction.

In the case of a trust, the Controlling Person(s) are the settlor(s), the trustee(s), the protector(s) (if any), the beneficiary(ies) or class(es) of beneficiaries, or any other natural person(s) exercising ultimate effective control over the trust (including through a chain of control or ownership). Under CRS the settlor(s), the trustee(s), the protector(s) (if any), and the beneficiary(ies) or class(es) of beneficiaries, are always treated as Controlling Persons of a trust, regardless of whether or not any of them exercises control over the activities of the trust. For purposes of CRS, jurisdictions have the option to exclude discretionary beneficiaries that did not receive a distribution in a calendar year from the definition of Controlling Person. Please consult your professional advisor.

In the case of a legal arrangement other than a trust (e.g. foundations), “Controlling Person(s)” means persons in equivalent or similar positions.

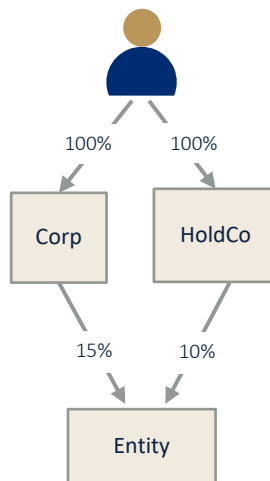
Non-Exhaustive Examples of Controlling Persons:

Direct or Indirect Ownership



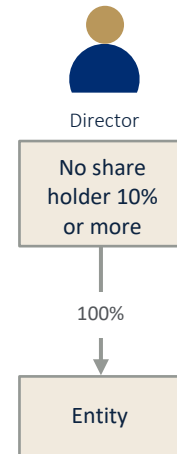
The two natural persons are Controlling Persons since each owns directly or indirectly at least 10% of the Entity

Indirect Ownership



The natural person is a Controlling Person since he owns directly or indirectly at least 10% of the Entity

Senior Managing Official



The Entity does not have natural person shareholders holding 10% of the shares or having control by other means

The senior managing official (e.g. CEO, CFO, director) is a Controlling Person.

“Direct Reporting Non-Financial Foreign Entity” [FATCA]

A Passive NFFE that elects to provide information about US Controlling Persons to the IRS and obtains a GIIN. Under US FATCA such Entity is treated as an Active NFFE but under CRS and EU DAC2 it is treated as a Passive NFFE which needs to disclose its Controlling Persons to the financial institution where it holds an account.

“EU DAC2”

European Union Directive on Administrative Cooperation”; 2011 European Union Directive 2011/16/EU as amended in 2014 by Directive 2014/107/EU, implementing CRS in European Union on January 1, 2016. See http://ec.europa.eu/taxation_customs/taxation/tax_cooperation/mutual_assistance/direct_tax_directive/index_en.htm

“Exempt Beneficial Owner” [FATCA/]

Certain classes of FIs that are identified as Exempt Beneficial Owners in the US FATCA Regulations and an applicable IGA , and includes *among others* the following:

- Any non-US government, any political subdivision of a non-US government, or any wholly owned agency or instrumentality of any one or more of the foregoing;
- Any international organization or any wholly owned agency or instrumentality thereof;
- Certain retirements funds;

Entities wholly owned by exempt beneficial owners.

“FATCA”

FATCA stands for the Foreign Account Tax Compliance provisions, which were enacted into US law as part of the Hiring Incentives to Restore Employment (HIRE) Act on March 18, 2010. FATCA creates a new information reporting and withholding regime for payments made to certain non-US financial institutions and other non-US Entities.

See <https://www.irs.gov/Businesses/Corporations/Foreign-Account-Tax-Compliance-Act-FATCA>

“Global Intermediary Identification Number” (“GIIN”) [FATCA]

GIIN means a Global Intermediary Identification Number assigned to a FFI or Registered Deemed Compliant FFI. A separate GIIN will be issued to the FI to identify each jurisdiction, including the FI’s jurisdiction of residence, in which the FI maintains a branch that is not treated as a Limited Branch. It is anticipated that the IRS FFI list will be updated on a monthly basis to add or remove FIs (or their branches). The GIIN may be used by an FI to identify itself to withholding agents and tax administrations for FATCA reporting.

The GIIN is a 19-character identification number in the format XXXXXX.XXXXX.XX.XXX.

See <https://www.irs.gov/businesses/corporations/fatca-online-registration-system-and-ffi-list-giin-composition-information>

“Holding Company or Treasury Center” [FATCA]

Subject to certain exclusions, under the US FATCA regulations applicable to non-IGA jurisdictions and a limited number of IGA jurisdictions (Malta) holding companies and treasury centers generally are considered financial institutions if they are:

- part of an expanded affiliated group that includes a Financial Institution, or;
- formed in connection with or availed of by a collective investment vehicle, mutual fund, exchange traded fund, private equity fund, hedge fund, venture capital fund, leveraged buyout fund, or any similar investment vehicle established with an investment strategy of investing, reinvesting or trading in financial assets

This classification is only acceptable in non-IGA countries or certain IGA countries (Malta) that have adopted this definition under their local FATCA guidance or that allow for the use of regulations found in the US Regulations (Netherlands) by way of an option. UK and Ireland have abandoned this FI category recently but still accept this classification for Entities classified as such based on the superseded guidance under such jurisdictions.

Under CRS this type of Holding and Treasury center FI as well as under most IGA’s does not exist and such Entity should be classified under any of the remaining Entity classifications.

“Inter-governmental Agreement” (“IGA”) [FATCA]

An IGA between the US and any jurisdiction to implement FATCA. An overview of IGA’s can be found at <http://www.treasury.gov/resource-center/tax-policy/treaties/Pages/FATCA-Archive.aspx>

“Investment Entity Managed by Another Financial Institution”

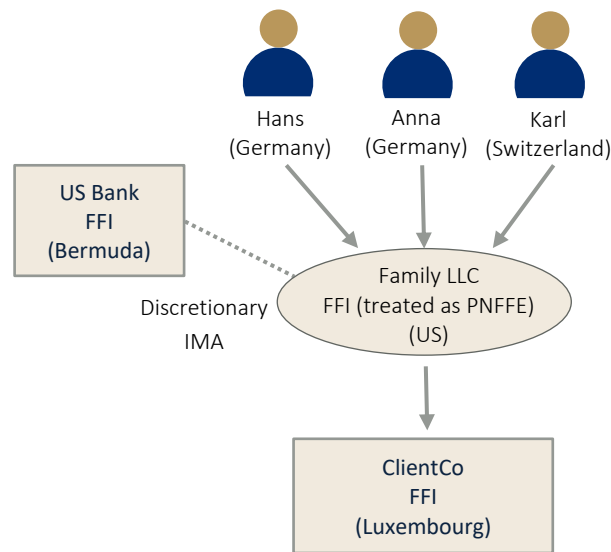
An Entity is “managed by” another Entity if the managing Entity performs, either directly or through another service provider on behalf of the managed Entity, any of the activities or operations described in clause (i) above in the definition of ‘Investment Entity’.

An Entity only manages another Entity if it has authority to discretionarily manage the other Entity’s assets (either in whole or part). Where an Entity is managed by a mix of Financial Institutions, Non-Financial Entities or individuals, the Entity is considered to be managed by another Entity, that is a Depository Institution, a Custodial Institution, a Specified Insurance Company, or an Investment Entity, if any of the managing Entities is such another Entity.

In the case of Trusts, this definition includes Trusts that meet the gross income test and have a corporate professional trustee.

“Investment Entity located in a Non-CRS Participating Jurisdiction and managed by another Financial Institution”

The term “Investment Entity located in a Non-Participating Jurisdiction and managed by another Financial Institution” means any Entity the gross income of which is primarily attributable to investing, reinvesting, or trading in Financial Assets if the Entity is (i) managed by a Financial Institution and (ii) not a Participating Jurisdiction Financial Institution. For CRS purposes, such Entities are treated as Passive NFEs and required to disclose its Controlling Persons. See example below:



“Non-Participating Foreign Financial Institution” [FATCA]

The term is defined in relevant US Treasury Regulations, and includes Entities in non-IGA jurisdictions that have not entered into an FFI agreement with the IRS. It also includes Entities in an IGA Partner Jurisdiction that remain significantly non-compliant within a period of 18 months after notification of significant non-compliance is first provided by the US Competent Authority and are published on a list of non-participating FFI’s by the IRS.

“Non-Participating Jurisdiction” [CRS]

See definition of Participating Jurisdiction below. In practice the most relevant non-participating jurisdiction is currently the US.

Clients or investors located in a Non-Participating Jurisdiction are still required to provide self-certification and determine their CRS classification.

“Owner Documented Financial Institution” [FATCA]

An Owner Documented FI (“ODFI”) is a FI solely because it is an Investment Entity and it may not be owned by, or in an expanded affiliated group with, any FFI that is a depository institution, custodial institution, or specified insurance company. In addition, the FFI may not maintain a financial account for any Non-Participating Financial Institution. The ODFI provides the designated withholding agent with all of the required documentation and

agrees to notify the withholding agent if there is a change in circumstances; and the designated withholding agent agrees to report to the IRS all of the information with respect to any specified US persons. ODFI status only applies between the Account Holder and the FI or US withholding agent which has agreed to report any US specified person to the IRS. It does not automatically apply to any other account with another financial institution and consequently ODFI status is not accepted. Such FI's must either be sponsored, trustee documented or provide an own GIIN.

“Participating Jurisdiction” [CRS]

A “Participating Jurisdiction” means a jurisdiction with which an agreement is in place pursuant to which it will provide the information set out in the CRS. Refer to the following link for the most current list of jurisdictions that have committed to participate in CRS. Please consult your local tax authorities to confirm the Entity’s jurisdiction has entered into an information sharing agreement. For some countries, jurisdictions that have committed to implement CRS are also treated as participating jurisdictions but this is subject to local legislation.

<http://www.oecd.org/tax/transparency/AEOI-commitments.pdf>

“Passive Income”

Although the definition of passive income varies between AEOI regimes, passive Income is generally considered to include the portion of gross income that consists of:

- a. dividends;
- b. interest;
- c. income equivalent to interest;
- d. rents and royalties, other than rents and royalties derived in the active conduct of a business conducted, at least in part, by employees of the NFE;
- e. annuities;
- f. the excess of gains over losses from the sale or exchange of Financial Assets that gives rise to the Passive Income described previously;
- g. the excess of gains over losses from transactions (including futures, forwards, options, and similar transactions) in any Financial Assets;
- h. the excess of foreign currency gains over foreign currency losses;
- i. net income from swaps; or
- j. amounts received under Cash Value Insurance Contracts.

Differences exist in the definition of passive income between the various AEOI regimes so please consult your professional advisor.

“Passive NFE”

“Passive NFE” means any NFE/NFFE that is not an Active NFE/NFFE.

“Resident for tax purposes”

Generally, an Entity will be resident for tax purposes in a jurisdiction if, under the laws of that jurisdiction (including tax conventions), it pays or should be paying tax therein by reason of its domicile, residence, place of management or incorporation, or any other criterion of a similar nature, and not only from sources in that jurisdiction.

An Entity such as a partnership, limited liability partnership or similar legal arrangement that has no residence for tax purposes, is subject to various rules to determine tax residency under AEOI regulations. E.g. In these cases the Entity may be treated as resident in the jurisdiction in which it is incorporated under the laws of, has its place of management, or where it is subject financial supervision. In the case of a trust, it may be considered to be resident for in the jurisdictions where one or more of its trustees are resident.

All the considerations above should be reviewed in light of the local legislation and AEOI guidance applicable to the Entity.

“Sponsored Closely Held Investment Entity” [FATCA]

An Investment Entity FFI that has entered into a sponsoring agreement and amongst other requirements meets the following criteria: it does not hold itself out as an investment vehicle for unrelated parties; and it has 20 or fewer individuals that own directly or indirectly its debt and equity interests, disregarding debt interests owned by Participating Financial Institutions, Registered and Certified Deemed Compliant Financial Institutions and the equity interest owned by an Entity that owns 100% of the equity and itself is a Sponsored Closely Held Investment Vehicle. Please refer to an applicable IGA or the US FATCA regulations for a list of all requirements.

This is a Certified Deemed Compliant FI or non-reporting FI under the IGAs and does not require a GIIN.

“Sponsored Direct Reporting Non-Financial Entity” [FATCA]

A Direct Reporting NFFE that has entered into an agreement with another Entity to act as its sponsoring Entity, subject to certain requirements. As of 1.1.2017 a sponsored direct reporting NFFE needs to obtain an own GIIN before that date it could use the GIIN of its sponsoring entity. Under US FATCA such Entity is treated as an Excepted NFFE/ Active NFFE but under CRS and EU DAC it is treated as a Passive NFFE which needs to disclose its Controlling Persons to the financial institution where it holds an account.

“Sponsored Investment Entity FFI” [FATCA]

An Investment Entity FFI that has entered into an agreement with another Entity to act as its sponsoring Entity, subject to certain requirements but which does not meet the sponsored closely held Investment Entity requirements. This is a registered deemed compliant FFI (“RDCFFI”) or non-reporting FI under the IGAs. A Sponsored Investment Entity as a RDCFFI must register on the IRS site as an FFI and obtain a GIIN by 1.1.2017. However a limited number of model 1 IGAs state in annex 2 that registration can also be postponed until 90 days after the date that the RDCFFI has first identified a US reportable account. This means that if there are no US reportable accounts no registration is required for Entities in the model 1 IGA jurisdictions which have adopted this modification.

“Tax Identification Number” (“TIN”) - including “functional equivalent”

The term “TIN” means Taxpayer Identification Number or a functional equivalent in the absence of a TIN. A TIN is a unique combination of letters or numbers assigned by a jurisdiction to an individual or an Entity and used to identify the individual or Entity for the purposes of administering the tax laws of such jurisdiction. Further details of acceptable TINs can be found at

<http://www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/tax-identification-numbers/>

Some jurisdictions do not issue a TIN. However, these jurisdictions often utilise some other high integrity number with an equivalent level of identification (a “functional equivalent”). Examples of that type of number include, for Entities, a Business/company registration code/number.

“Trustee Documented Trust”

Arrangement whereby the trustee, rather than the trust as an Entity, provides AEOI information (including filing of AEOI returns) to the local government. For purposes of US FATCA, the trustee of a Trustee-Documented Trust, must have and provide its FATCA Trustee FFI GIIN.

“US Person” [FATCA]

A US citizen or resident individual, a partnership or corporation organized in the United States or under the laws of the United States or any State thereof, a trust if (i) a court within the United States would have authority under applicable law to render orders or judgments concerning substantially all issues regarding administration of the trust, and (ii) one or more US persons have the authority to control all substantial decisions of the trust, or an estate of a decedent that is a citizen or resident of the United States. This shall be interpreted in accordance with the US Internal Revenue Code.

“W-9 Form”

IRS tax form, see link for integral form and instructions: <https://www.irs.gov/pub/irs-pdf/fw9.pdf>