

For Official Use Only	
Account	

Tax Compliance – international exchange of information agreement Entity self-certification form

Instructions

Permanent Bank International Ltd is obliged under the Isle of Man Income Tax Act 1970, Regulations, Guidance Notes made pursuant to that Law and Treaties and Intergovernmental Agreements entered into by the Isle of Man in relation to the automatic exchange of information for tax matters (collectively 'AEOI'), to collect certain information about each account holder's tax status.

Please complete all sections below and provide any additional information that is requested. Please note that we may be obliged to share this information with relevant tax authorities. Terms referenced in this form shall have the same meaning as applicable under the relevant Isle of Man Regulations, Guidance Notes or Agreements.

If any of the information below regarding your tax residence or AEOI classification changes in the future, please ensure you advise us of these changes promptly. If you have any questions about how to complete this form, please refer to the OECDs CRS Commentaries, the OECD AEOI Portal, the Isle of Man's FATCA and/or CRS guidance or contact your tax advisor.

Part I - General

Section 1: Account Holder Identification

Legal Name of Entity or Organisation	Country of Incorporation/Organisation/Establishment	
Registered Address:		
Number & Street	City/Town	
State/Province/County	Post Code	Country
Mailing address (if different from above):		
Number & Street	City/Town	
State/Province/County	Post Code	Country

Part II – US FATCA

Section 2: US Persons

Please tick and complete as appropriate:-

- (a) The entity is a Specified US Person and the entity's US federal taxpayer identifying number (US TIN) is as follows: _____
- (b) The entity is a US Person that is not a Specified US Person. Indicate Exemption below:

If the entity is not a US Person, please also complete Section 3.

Section 3: US FATCA Classification for all Non-US Entities

Please complete this section if the entity is **not** a US Person: -

3.1 If the entity is a Registered Financial Institution, please tick one of the categories below, and provide the entity's Global Intermediary Identification Number (GIIN) at 3.1.1

- (a) Isle of Man or IGA Partner Jurisdiction Financial Institution
- (b) Registered Deemed Compliant Foreign Financial Institution
- (c) Participating Foreign Financial Institution

3.1.1 GIIN: _____

3.2 If the entity is a Financial Institution but unable to provide a GIIN, please tick one of the reasons below:-

- (a) The entity is a Sponsored Financial Institution (including a Sponsored Investment Entity and Sponsored Closely Held Investment Vehicle) and has not yet obtained a GIIN but is sponsored by another entity that has registered as a Sponsoring Entity. Please provide the Sponsoring Entity's name and GIIN below:

Sponsoring Entity's Name: _____

Sponsoring Entity's GIIN: _____

- (b) The Entity is a Trustee Documented Trust. Please provide your Trustee's name and GIIN below:

Trustee's Name: _____

Trustee's GIIN: _____

- (c) The Entity is a Certified Deemed Compliant, or other Non-Reporting Foreign Financial Institution (including a Foreign Financial Institution deemed compliant under Annex II of an IGA, except for a Trustee Documented Trust or Sponsored Financial Institution). Indicate exemption: _____

- (d) The Entity is an Owner Documented Financial Institution

- (e) The Entity is a Non-Participating Foreign Financial Institution

3.3 If the entity is **not** a Financial Institution please confirm the Entity's FATCA status below:-

(a) The entity is an Exempt Beneficial Owner. Indicate status below:

(b) The Entity is an Active Non-Financial Foreign Entity (including an Excepted NFFE)

(c) The Entity is a Passive Non-Financial Foreign Entity

i. If the Entity is a Direct Reporting NFFE, please provide the Entity's GIIN below:

ii. If the Entity is a Sponsored Direct Reporting NFFE, please provide the Sponsoring Entity's Name and GIIN below:

Sponsoring Entity's Name: _____

Sponsoring Entity's GIIN: _____

If you have confirmed that the Entity is a Passive Non-Financial Foreign Entity please provide details of the Controlling Persons by completing Part IV of this form.

Part III – The Common Reporting Standard

Section 4: Declaration of Tax Residence

Please indicate the Entity's place of tax residence. If resident in more than one jurisdiction please detail all jurisdictions and associated Tax Identification Number (TIN) for each jurisdiction.

Jurisdiction of Tax Residence	TIN

If a TIN is not available please provide a functional equivalent (such as a business or company registration number or other similar form of identification). If no TIN or functional equivalent is available for any of the jurisdictions listed please advise the reason why (such as the jurisdiction does not issue such numbers) below:-

Further information on the issuance rules for TINs and their format can be found on the OECDs AEOI Portal:

<https://search.oecd.org>

Section 5: CRS Classification

Please provide your CRS classification by ticking the corresponding box(es) below. Please note, an Entity's CRS classification may not necessarily be the same as its classification for US FATCA purposes.

5.1 If the Entity is a Financial Institution please tick this box and specify the type of Financial Institution below:

5.1.1 Depository Institution

5.1.2 Custodial Institution

5.1.3 Investment Entity - within the meaning of Section VIII, A.6(a) of the CRS

5.1.4 'Managed' Investment Entity – within the meaning of Section VIII, A.6(b) of the CRS

5.1.5 Specified Insurance Company

If you have ticked the box at 5.1.4 and the Entity is resident in a Non-Participating Jurisdiction the Entity will be treated as a Passive Non-Financial Entity therefore please provide details of the Controlling Persons by completing Part IV of this form.

5.2 Non-Reporting CRS Financial Institution. Please specify the type below:

- Governmental Entity
 - International Organisation
 - Central Bank
 - Broad Participation Retirement Fund
 - Narrow Participation Retirement Fund
 - Pension Fund of a Governmental Entity, International Organisation or Central Bank
 - Exempt Collective Investment Vehicle
 - Trustee Documented Trust
 - Qualified Credit Card Issuer
 - Other Entity defined under domestic law as low risk of being used to evade tax. Please specify the type below:
-

5.3 If the Entity is an Active Non-Financial Entity please tick this box

5.4 If the Entity is a Passive Non-Financial Entity please tick this box

If you have confirmed that the Entity is a Passive Non-Financial Entity please provide details of the Controlling Persons by completing Part IV of this form.

Section 6: Entity Declaration and Undertakings

I declare (as the authorised signatory of the Entity) that the information provided in this form is, to the best of my knowledge and belief, accurate and complete.

I undertake to advise the recipient promptly and provide an updated Self-Certification form within 30 days where any change in circumstances occurs which causes any of the information contained in this form to be inaccurate or incomplete.

Where legally obliged to do so, I hereby consent to the recipient sharing this information with the relevant tax information authorities.

Authorised Signature: _____

Position/Title: _____

Date: _____

Part IV – Controlling Persons (1)

Please complete the following section in full for each Controlling Person.

Section 7: Identification of a Controlling Person

7.1 Name of Controlling Person

First/Given Name: _____

Middle Name: _____

Surname/Family Name: _____

7.2 Current Residence Address

House/Apt/Suite Name, Number, Street: _____

Town/City, Providence/County/State: _____

Country: _____

Postal Code/ZIP Code: _____

7.3 Mailing Address (please complete if different from 7.2)

House/Apt/Suite Name, Number, Street: _____

Town/City, Providence/County/State: _____

Country: _____

Postal Code/ZIP Code: _____

7.4 Date of Birth

7.5 Place of Birth

Town or City of Birth: _____

Country of Birth: _____

7.6 Are you a US Citizen?

Yes No

Section 8: Declaration of Tax Residence

Please indicate the Controlling Person's place of tax residence. If resident in more than one jurisdiction please detail all jurisdictions and associated Tax Identification Number (TIN) for each jurisdiction.

Jurisdiction of Tax Residence	TIN	TIN Type

If a TIN is not available please provide a functional equivalent (such as your social security, national insurance, citizen, personal identification or a resident registration number). If no TIN or functional equivalent is available for any of the jurisdictions listed please advise the reason why (such as the

jurisdiction does not issue such numbers) below:-

Further information on the issuance rules for TINs and their format can be found on the OECDs AEOI Portal: <https://search.oecd.org>

Section 9: Type of Controlling Person

Please provide the Controlling Person's Status by ticking the appropriate box below:-

- (a) Controlling Person of a Legal Person – Control by Ownership
- (b) Controlling Person of a Legal Person – Control by Other Means
- (c) Controlling Person of a Legal Person – Senior Managing Official
- (d) Controlling Person of a Trust – Settlor
- (e) Controlling Person of a Trust – Trustee
- (f) Controlling Person of a Trust – Protector
- (g) Controlling Person of a Trust – Beneficiary
- (h) Controlling Person of a Trust – Other
- (i) Controlling Person of a Legal Arrangement (Non-Trust) – Settlor Equivalent
- (j) Controlling Person of a Legal Arrangement (Non-Trust) – Trustee Equivalent
- (k) Controlling Person of a Legal Arrangement (Non-Trust) – Protector Equivalent
- (l) Controlling Person of a Legal Arrangement (Non-Trust) – Beneficiary Equivalent
- (m) Controlling Person of a Legal Arrangement (Non-Trust) – Other Equivalent

Section 10: Controlling Person Declaration and Undertakings

I acknowledge that the information provided in this form and regarding the Controlling Persons and any Reportable Account(s) may be reported to the tax authorities of the jurisdiction in which this account(s) is maintained and exchanged with tax authorities of another jurisdiction(s) in which [I/the Controlling Person] may be tax resident pursuant to International Agreement to exchange financial account information.

I certify that I am the Controlling Person, or am authorised to sign for the Controlling Person, of all the account(s) held by the Entity Account Holder to which this form relates.

I declare that all of the statements made in this declaration are, to the best of my knowledge, correct and complete.

I undertake to advise the recipient promptly and provide an updated Self-Certification form within 30 days where any change in circumstances occurs which causes any of the information contained in this form to be inaccurate or incomplete.

Signature: _____

Print Name: _____

Note: If you are not the Controlling Person please indicate the capacity in which you are signing this form. If you are signing under a Power of Attorney please also attach a certified copy of the Power of Attorney.

Date: _____

Part IV – Controlling Persons (2)

Please complete the following section in full for each Controlling Person.

Section 7: Identification of a Controlling Person

7.1 Name of Controlling Person

First/Given Name: _____

Middle Name: _____

Surname/Family Name: _____

7.2 Current Residence Address

House/Apt/Suite Name, Number, Street: _____

Town/City, Providence/County/State: _____

Country: _____

Postal Code/ZIP Code: _____

7.3 Mailing Address (please complete if different from 7.2)

House/Apt/Suite Name, Number, Street: _____

Town/City, Providence/County/State: _____

Country: _____

Postal Code/ZIP Code: _____

7.4 Date of Birth

7.5 Place of Birth

Town or City of Birth: _____

Country of Birth: _____

7.6 Are you a US Citizen?

Yes

No

Section 8: Declaration of Tax Residence

Please indicate the Controlling Person's place of tax residence. If resident in more than one jurisdiction please detail all jurisdictions and associated Tax Identification Number (TIN) for each jurisdiction.

Jurisdiction of Tax Residence	TIN	TIN Type

If a TIN is not available please provide a functional equivalent (such as your social security, national insurance, citizen, personal identification or a resident registration number). If no TIN or functional equivalent is available for any of the jurisdictions listed please advise the reason why (such as the jurisdiction does not issue such numbers) below:-

Further information on the issuance rules for TINs and their format can be found on the OECDs AEOI Portal: <https://search.oecd.org>

Section 9: Type of Controlling Person

Please provide the Controlling Person’s Status by ticking the appropriate box below:-

- (a) Controlling Person of a Legal Person – Control by Ownership
- (b) Controlling Person of a Legal Person – Control by Other Means
- (c) Controlling Person of a Legal Person – Senior Managing Official
- (d) Controlling Person of a Trust – Settlor
- (e) Controlling Person of a Trust – Trustee
- (f) Controlling Person of a Trust – Protector
- (g) Controlling Person of a Trust – Beneficiary
- (h) Controlling Person of a Trust – Other
- (i) Controlling Person of a Legal Arrangement (Non-Trust) – Settlor Equivalent
- (j) Controlling Person of a Legal Arrangement (Non-Trust) – Trustee Equivalent
- (k) Controlling Person of a Legal Arrangement (Non-Trust) – Protector Equivalent
- (l) Controlling Person of a Legal Arrangement (Non-Trust) – Beneficiary Equivalent
- (m) Controlling Person of a Legal Arrangement (Non-Trust) – Other Equivalent

Section 10: Controlling Person Declaration and Undertakings

I acknowledge that the information provided in this form and regarding the Controlling Persons and any Reportable Account(s) may be reported to the tax authorities of the jurisdiction in which this account(s) is maintained and exchanged with tax authorities of another jurisdictions) in which [I/the Controlling Person] may be tax resident pursuant to International Agreement to exchange financial account information.

I certify that I am the Controlling Person, or am authorised to sign for the Controlling Person, of all the account(s) held by the Entity Account Holder to which this form relates.

I declare that all of the statements made in this declaration are, to the best of my knowledge, correct and complete.

I undertake to advise the recipient promptly and provide an updated Self-Certification form within 30 days where any change in circumstances occurs which causes any of the information contained in this form to be inaccurate or incomplete.

Signature: _____

Print Name: _____

Note: If you are not the Controlling Person please indicate the capacity in which you are signing this form. If you are signing under a Power of Attorney please also attach a certified copy of the Power of Attorney.

Date: _____

Part IV – Controlling Persons (3)

Please complete the following section in full for each Controlling Person.

Section 7: Identification of a Controlling Person

7.1 Name of Controlling Person

First/Given Name: _____

Middle Name: _____

Surname/Family Name: _____

7.2 Current Residence Address

House/Apt/Suite Name, Number, Street: _____

Town/City, Providence/County/State: _____

Country: _____

Postal Code/ZIP Code: _____

7.3 Mailing Address (please complete if different from 7.2)

House/Apt/Suite Name, Number, Street: _____

Town/City, Providence/County/State: _____

Country: _____

Postal Code/ZIP Code: _____

7.4 Date of Birth

7.5 Place of Birth

Town or City of Birth: _____

Country of Birth: _____

7.6 Are you a US Citizen?

Yes

No

Section 8: Declaration of Tax Residence

Please indicate the Controlling Person's place of tax residence. If resident in more than one jurisdiction please detail all jurisdictions and associated Tax Identification Number (TIN) for each jurisdiction.

Jurisdiction of Tax Residence	TIN	TIN Type

If a TIN is not available please provide a functional equivalent (such as your social security, national insurance, citizen, personal identification or a resident registration number). If no TIN or functional equivalent is available for any of the jurisdictions listed please advise the reason why (such as the

jurisdiction does not issue such numbers) below:-

Further information on the issuance rules for TINs and their format can be found on the OECDs AEOI Portal:<https://search.oecd.org>

Section 9: Type of Controlling Person

Please provide the Controlling Person's Status by ticking the appropriate box below:-

- (a) Controlling Person of a Legal Person – Control by Ownership
- (b) Controlling Person of a Legal Person – Control by Other Means
- (c) Controlling Person of a Legal Person – Senior Managing Official
- (d) Controlling Person of a Trust – Settlor
- (e) Controlling Person of a Trust – Trustee
- (f) Controlling Person of a Trust – Protector
- (g) Controlling Person of a Trust – Beneficiary
- (h) Controlling Person of a Trust – Other
- (i) Controlling Person of a Legal Arrangement (Non-Trust) – Settlor Equivalent
- (j) Controlling Person of a Legal Arrangement (Non-Trust) – Trustee Equivalent
- (k) Controlling Person of a Legal Arrangement (Non-Trust) – Protector Equivalent
- (l) Controlling Person of a Legal Arrangement (Non-Trust) – Beneficiary Equivalent
- (m) Controlling Person of a Legal Arrangement (Non-Trust) – Other Equivalent

Section 10: Controlling Person Declaration and Undertakings

I acknowledge that the information provided in this form and regarding the Controlling Persons and any Reportable Account(s) may be reported to the tax authorities of the jurisdiction in which this account(s) is maintained and exchanged with tax authorities of another jurisdiction(s) in which [I/the Controlling Person] may be tax resident pursuant to International Agreement to exchange financial account information.

I certify that I am the Controlling Person, or am authorised to sign for the Controlling Person, of all the account(s) held by the Entity Account Holder to which this form relates.

I declare that all of the statements made in this declaration are, to the best of my knowledge, correct and complete.

I undertake to advise the recipient promptly and provide an updated Self-Certification form within 30 days where any change in circumstances occurs which causes any of the information contained in this form to be inaccurate or incomplete.

Signature: _____

Print Name: _____

Note: If you are not the Controlling Person please indicate the capacity in which you are signing this form. If you are signing under a Power of Attorney please also attach a certified copy of the Power of Attorney.

Date:

Part IV – Controlling Persons (4)

Please complete the following section in full for each Controlling Person.

Section 7: Identification of a Controlling Person

7.1 Name of Controlling Person

First/Given Name: _____

Middle Name: _____

Surname/Family Name: _____

7.2 Current Residence Address

House/Apt/Suite Name, Number, Street: _____

Town/City, Providence/County/State: _____

Country: _____

Postal Code/ZIP Code: _____

7.3 Mailing Address (please complete if different from 7.2)

House/Apt/Suite Name, Number, Street: _____

Town/City, Providence/County/State: _____

Country: _____

Postal Code/ZIP Code: _____

7.4 Date of Birth

7.5 Place of Birth

Town or City of Birth: _____

Country of Birth: _____

7.6 Are you a US Citizen?

Yes No

Section 8: Declaration of Tax Residence

Please indicate the Controlling Person's place of tax residence. If resident in more than one jurisdiction please detail all jurisdictions and associated Tax Identification Number (TIN) for each jurisdiction.

Jurisdiction of Tax Residence	TIN	TIN Type

If a TIN is not available please provide a functional equivalent (such as your social security, national insurance, citizen, personal identification or a resident registration number). If no TIN or functional equivalent is available for any of the jurisdictions listed please advise the reason why (such as the

jurisdiction does not issue such numbers) below:-

Further information on the issuance rules for TINs and their format can be found on the OECDs AEOI Portal: <https://search.oecd.org>

Section 9: Type of Controlling Person

Please provide the Controlling Person's Status by ticking the appropriate box below:-

- (a) Controlling Person of a Legal Person – Control by Ownership
- (b) Controlling Person of a Legal Person – Control by Other Means
- (c) Controlling Person of a Legal Person – Senior Managing Official
- (d) Controlling Person of a Trust – Settlor
- (e) Controlling Person of a Trust – Trustee
- (f) Controlling Person of a Trust – Protector
- (g) Controlling Person of a Trust – Beneficiary
- (h) Controlling Person of a Trust – Other
- (i) Controlling Person of a Legal Arrangement (Non-Trust) – Settlor Equivalent
- (j) Controlling Person of a Legal Arrangement (Non-Trust) – Trustee Equivalent
- (k) Controlling Person of a Legal Arrangement (Non-Trust) – Protector Equivalent
- (l) Controlling Person of a Legal Arrangement (Non-Trust) – Beneficiary Equivalent
- (m) Controlling Person of a Legal Arrangement (Non-Trust) – Other Equivalent

Section 10: Controlling Person Declaration and Undertakings

I acknowledge that the information provided in this form and regarding the Controlling Persons and any Reportable Account(s) may be reported to the tax authorities of the jurisdiction in which this account(s) is maintained and exchanged with tax authorities of another jurisdictions) in which [I/the Controlling Person] may be tax resident pursuant to International Agreement to exchange financial account information.

I certify that I am the Controlling Person, or am authorised to sign for the Controlling Person, of all the account(s) held by the Entity Account Holder to which this form relates.

I declare that all of the statements made in this declaration are, to the best of my knowledge, correct and complete.

I undertake to advise the recipient promptly and provide an updated Self-Certification form within 30 days where any change in circumstances occurs which causes any of the information contained in this form to be inaccurate or incomplete.

Signature: _____

Print Name: _____

Note: If you are not the Controlling Person please indicate the capacity in which you are signing this form. If you are signing under a Power of Attorney please also attach a certified copy of the Power of Attorney.

Date: _____

Appendix – Summary Descriptions of Select Defined CRS Terms

Note: These are selected summaries of defined terms provided to assist you with the completion of this form. Further details can be found within the OECD *“Common Reporting Standard for Automatic Exchange of Financial Account Information”* (the “CRS”), the associated *“Commentary”* to the CRS, and domestic guidance. This can be found at www.oecd.org

If you have any questions then please contact your tax adviser or tax authority.

“Account Holder”

The “Account Holder” is the person listed or identified as the holder of a Financial Account by the Financial Institution that maintains the account. This is regardless of whether such person is a flow-through Entity. Thus, for example, if a trust or an estate is listed as the holder or owner of a Financial Account, the trust or estate is the Account Holder, rather than the trustee or the trust’s owners or beneficiaries. Similarly, if a partnership is listed as the holder or owner of a Financial Account, the partnership is the Account Holder, rather than the partners in the partnership. A person, other than a Financial Institution, holding a Financial Account for the benefit or account of another person as agent, custodian, nominee, signatory, investment advisor, or intermediary, is not treated as holding the account, and such other person is treated as holding the account.

“Active NFE”

An NFE is an Active NFE if it meets any of the criteria listed below. In summary, those criteria refer to:

- active NFEs by reason of income and assets;
- publicly traded NFEs;
- Governmental Entities, International Organisations, Central Banks, or their wholly owned Entities;
- holding NFEs that are members of a nonfinancial group;
- start-up NFEs;
- NFEs that are liquidating or emerging from bankruptcy;
- treasury centres that are members of a nonfinancial group; or
- non-profit NFEs.

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

- a) less than 50% of the NFE’s gross income for the preceding calendar year or other appropriate reporting period is passive income 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;
- b) 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;
- c) the NFE is a Governmental Entity, an International Organisation, a Central Bank, or an Entity wholly owned by one or more of the foregoing;
- d) 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;
- e) 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;
- f) 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;
- g) 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**
- h) the NFE meets all of the following requirements (a “non-profit NFE”) :
- i) 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;
 - ii) it is exempt from income tax in its jurisdiction of residence;
 - iii) it has no shareholders or members who have a proprietary or beneficial interest in its income or assets;
 - iv) 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
 - v) 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 U.S. Territory NFEs) may qualify for Active NFFE status under FATCA but not Active NFE status under the CRS.

“Control”

“Control” over an Entity is generally exercised by the natural person(s) who ultimately has a controlling ownership interest (typically on the basis of a certain percentage (e.g. 25%)) in the Entity. 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. Where no natural person(s) is/are identified as exercising control of the Entity through ownership interests, then under the CRS the Reportable Person is deemed to be the natural person who hold the position of senior managing official.

“Controlling Person(s)”

“Controlling Persons” are the natural person(s) who exercise control over an entity. Where that entity is treated as a Passive Non-Financial Entity (“Passive NFE”) then a Financial Institution is required to determine whether or not these Controlling Persons are Reportable Persons. This definition corresponds to the term “beneficial owner” described in Recommendation 10 and the Interpretative Note on Recommendation 10 of the Financial Action Task Force Recommendations (as adopted in February 2012).

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 the 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.

Where the settlor(s) of a trust is an Entity then the CRS requires Financial Institutions to also identify the Controlling Persons of the settlor(s) and when required report them as Controlling Persons of the trust.

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

“Custodial Institution”

The term “Custodial Institution” means any Entity that holds, as a substantial portion of its business, Financial Assets for the account of others. This is where the Entity’s gross income attributable to the

holding of Financial Assets and related financial services equals or exceeds 20% of the Entity's gross income during the shorter of: (i) the three-year period that ends on 31 December (or the final day of a non-calendar year accounting period) prior to the year in which the determination is being made; or (ii) the period during which the Entity has been in existence.

"Depository Institution"

The term "Depository Institution" means any Entity that accepts deposits in the ordinary course of a banking or similar business.

"FATCA"

FATCA stands for the U.S. provisions commonly known as the Foreign Account Tax Compliance Act, which were enacted into U.S. 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-U.S. financial institutions and other non- U.S. entities.

"Entity"

The term "Entity" means a legal person or a legal arrangement, such as a corporation, organisation, partnership, trust or foundation. This term covers any person other than an individual (i.e. a natural person).

"Financial Institution"

The term "Financial Institution" means a "Custodial Institution", a "Depository Institution", an "Investment Entity", or a "Specified Insurance Company". Please see the relevant domestic guidance and the CRS for further classification definitions that apply to Financial Institutions.

"Investment Entity"

The term "Investment Entity" includes two types of Entities:

(i) an Entity that primarily conducts as a business one or more of the following activities or operations for or on behalf of a customer:

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

Such activities or operations do not include rendering non-binding investment advice to a customer.

(ii) "The second type of "Investment Entity" ("Investment Entity managed by another Financial Institution") is any Entity the gross income of which is primarily attributable to investing, reinvesting, or trading in Financial Assets where the Entity is managed by another Entity that is a Depository Institution, a Custodial Institution, a Specified Insurance Company, or the first type of Investment Entity.

"Investment Entity located in a Non-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.

"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 discretionary authority to manage the other Entity's assets (either in whole or part). Where an Entity is managed by a mix of Financial Institutions, NFEs 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 the first type of Investment Entity, if any of the

managing Entities is such another Entity.

“NFE”

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

“Non-Reporting Financial Institution”

A Non-Reporting Financial Institution” means any Financial Institution that is:

- a Governmental Entity, International Organisation or Central Bank, other than with respect to a payment that is derived from an obligation held in connection with a commercial financial activity of a type engaged in by a Specified Insurance Company, Custodial Institution, or Depository Institution;
- a Broad Participation Retirement Fund; a Narrow Participation Retirement Fund; a Pension Fund of a Governmental Entity, International Organisation or Central Bank; or a Qualified Credit Card Issuer;
- an Exempt Collective Investment Vehicle; or
- a Trustee-Documented Trust: a trust where the trustee of the trust is a Reporting Financial Institution and reports all information required to be reported with respect to all Reportable Accounts of the trust;
- any other defined in a countries domestic law as a Non-Reporting Financial Institution.

“Participating Jurisdiction”

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 and that is identified in a published list.

“Participating Jurisdiction Financial Institution”

The term “Participating Jurisdiction Financial Institution means (i) any Financial Institution that is tax resident in a Participating Jurisdiction, but excludes any branch of that Financial Institution that is located outside of that jurisdiction, and (ii) any branch of a Financial Institution that is not tax resident in a Participating Jurisdiction, if that branch is located in such Participating Jurisdiction.

“Passive NFE”

Under the CRS a “Passive NFE” means any: (i) NFE that is not an Active NFE; and (ii) Investment Entity located in a Non- Participating Jurisdiction and managed by another Financial Institution.

“Related Entity”

An Entity is a “Related Entity” of another Entity if either Entity controls the other Entity, or the two Entities are under common control. For this purpose control includes direct or indirect ownership of more than 50% of the vote and value in an Entity.

“Reportable Account”

The term “Reportable Account” means an account held by one or more Reportable Persons or by a Passive NFE with one or more Controlling Persons that is a Reportable Person.

“Reportable Jurisdiction”

A Reportable Jurisdiction is a jurisdiction with which an obligation to provide financial account information is in place and that is identified in a published list.

“Reportable Jurisdiction Person”

A Reportable Jurisdiction Person is an Entity that is tax resident in a Reportable Jurisdiction(s) under the tax laws of such jurisdiction(s) - by reference to local laws in the country where the Entity is established, incorporated or managed. An Entity such as a partnership, limited liability partnership or similar legal arrangement that has no residence for tax purposes shall be treated as resident in the jurisdiction in which its place of effective management is situated. As such if an Entity certifies that it has no residence for tax purposes it should complete the form stating the address of its principal office.

Dual resident Entities may rely on the tiebreaker rules contained in tax conventions (if applicable) to determine their residence for tax purposes.

“Reportable Person”

A “Reportable Person” is defined as a “Reportable Jurisdiction Person”, other than:

- a corporation the stock of which is regularly traded on one or more established securities markets;
- any corporation that is a Related Entity of a corporation described in clause (i);
- a Governmental Entity;
- an International Organisation;
- a Central Bank; *or*
- a Financial Institution (except for an Investment Entity described in Sub Paragraph A(6) b) of the CRS that are not Participating Jurisdiction Financial Institutions. Instead, such Investment Entities are treated as Passive NFE's.)

“Resident for tax purposes”

Each jurisdiction has its own rules for defining tax residence, and jurisdictions have provided information on how to determine whether an entity is tax resident in the jurisdiction on the following website: <https://search.oecd.org>. 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 his domicile, residence, place of management or incorporation, or any other criterion of a similar nature, and not only from sources in that jurisdiction. Dual resident Entities may rely on the tiebreaker rules contained in tax conventions (if applicable) to solve cases of double residence for determining their residence for tax purposes. An Entity such as a partnership, limited liability partnership or similar legal arrangement that has no residence for tax purposes shall be treated as resident in the jurisdiction in which its place of effective management is situated. For additional information on tax residence, please talk to your tax adviser or see the following link: <https://search.oecd.org>.

“Specified Insurance Company”

The term “Specified Insurance Company” means any Entity that is an insurance company (or the holding company of an insurance company) that issues, or is obligated to make payments with respect to, a Cash Value Insurance Contract or an Annuity Contract.

“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 www.oecd.org.

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.