

Self-certification for the Automatic Exchange of Information

This form is provided to you to comply with regulations based on the Organisation for Economic Co-operation and Development (OECD) Common Reporting Standard ("CRS") requiring Banking Circle (a reporting Financial Institutions) to collect and report certain information about an account holder's tax residency. If the account holder or any of its Controlling Persons has a tax residence outside Luxembourg, the personal and financial information may be reported to the Luxembourg tax authority and foreign tax authorities.

Please note that failure to complete this self-certification form or filling it out in an erroneous or incomplete manner may lead to an inaccurate reporting of information.

Definitions can be found in the glossary attached hereto. If you still have any questions on how to complete this form or how to determine your tax residency status, please contact your tax advisor.

Part I – IDENTIFICATION OF ACCOUNT HOLDER

A. Legal name of entity/branch

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B. Country of incorporation/organisation

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C. Current registered address

Number, Street

--	--

Postal code, City

--	--

Country

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Part II – TAX RESIDENCE

Please provide below the list of ALL countries where the entity is resident for tax purposes (*) and the associated Taxpayer Identification Number (TIN).

Please mark “applied for” in lieu of the TIN number in the column below, if you are a new incorporated company and have applied for a TIN (you will need to provide it to us within 90 days)

If however a TIN is unavailable for another reason, please provide the appropriate reason A, B, or C where appropriate:

Reason A: the country/jurisdiction where the account holder is liable to pay does not issue TIN to its resident

Reason B: The account holder is otherwise unable to obtain a TIN or equivalent number (Please explain why it is the case if you have selected this reason)

Reason C: no TIN is required (Note: only select this reason if the authorities of the country/jurisdiction of tax residence entered below do not require the TIN to be disclosed).

Country of Tax Residence	Taxpayer Identification Number (TIN)	If not TIN available enter reason A, B or C

* Additional indications on tax residence can be found in the glossary attached hereto.

Please explain in the following boxes why you are unable to obtain a TIN if you selected **Reason B** above.

Part III – CRS STATUS OF ACCOUNT HOLDER

Please provide the account holder's status by ticking one of the following boxes:

1. .
 - a. Financial Institution – Investment Entity
 - i. An Investment Entity located in a non-participating jurisdiction and managed by another Financial Institution ☐
(**Note:** if ticking this box please also complete **Annex 1**)
 - ii. Other Investment Entity ☐
 - b. Financial Institution – Depository Institution, Custodial Institution or Specified Insurance Company ☐

If you have ticked **a.** or **b.** above, please provide, if held the account holder's global intermediary identification number ("GIIN") obtained for FATCA purposes.

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- c. Active NFE – a corporation the stock of which is regularly traded on an established securities market or a corporation which is a related entity of such corporation ☐
 If you have ticked (c), please provide the name of the established securities market on which the corporation is regularly traded: _____ If you are a Related Entity of a regularly traded corporation, please provide the name of the regularly traded corporation that the Entity in (c) is a Related Entity of: _____
- d. Active NFE – a Government Entity or Central Bank ☐
- e. Active NFE – an International Organisation (for example United Nations or World Health Organisation) ☐
- f. Active NFE – other than **c.** – **e.** (for example a start-up NFE or non-profit NFE) ☐
- g. Passive NFE (**Note:** if ticking this box please also complete **Annex 1**) ☐

Part V – DECLARATION AND SIGNATURE

As a representative(s) authorised to sign on behalf of the entity, I declare that, to the best of my knowledge and belief, the information on this form is correct and complete. In particular, I confirm that the entity and its controlling person(s) are not tax residents in a country other than the one(s) listed.

I personally undertake to notify Banking Circle in writing of any change affecting the declarations on this form and in Annex 1 within 30 days. Failing to do so, I may be held personally liable by Banking Circle for any and every consequence of such changes.

The signatory(ies) acting in the name of and on behalf of the company undertake(s), vis-à-vis Banking Circle, to respect all its declarative tax obligations to the relevant authorities in the country(ies) in which the entity is present, and, where required, commit(s) to paying all taxes and fees relating to all and any assets and revenues deposited at, or managed by, Banking Circle.

I declare to have obtained an express agreement from the controlling persons mentioned in Annex 1 to this form to process and disclose the information related to them to the tax authorities, in conformity with the Banking Circle's Business Terms (available at www.bankingcircle.com) and its legal obligations of declaration as well as with the rules of identification and fight against money laundering and terrorism financing.

Please note that the form needs to be signed by all the legal representatives whose signature is necessary for the entity to engage with third parties.

Signature(s) of authorised representative(s):

First name and last name:

Date:

Annex 1: List ALL Controlling Persons of the entity if the entity is a Passive NFE or an Investment entity resident in a non-CRS jurisdiction

Control over an Entity is generally exercised by the natural person(s) who ultimately has(have) a controlling **ownership** interest in the Entity. Where no natural person exercises control through ownership interests, the Controlling Person(s) of the Entity will be the natural person(s) who exercise(s) control of the Entity through **other means**. Where no natural person(s) is(are) identified as exercising control of the Entity, the Controlling Person(s) of the Entity will be the natural person(s) who hold(s) the position of **senior managing official**.

Controlling Persons are the natural persons who exercise control over an entity. This definition corresponds to the term "beneficial owner" as described in Recommendation 10 of the Financial Action Task Force Recommendations (as adopted in February 2012) and as stated in the AML Luxembourg law dated 12 November 2004. **Each Passive NFE or Investment entity resident in a non-CRS jurisdiction has at least one controlling person. Please refer to the Glossary for definitions and examples.** In case there is any change affecting the information regarding the entity's Controlling Person(s), a new self-certification will have to be provided within 30 days.

1) List all Controlling Persons (reportable or not reportable) in the table below:

Name, first name, date and place of birth	Type of control (only tick one box)	Residence address and email address	ALL countries of tax residence	Taxpayer Identification Number (TIN)*	Signature of Controlling Person
	<input type="checkbox"/> Ownership (%) <input type="checkbox"/> Other means <input type="checkbox"/> Senior managing official Function in the company:				
	<input type="checkbox"/> Ownership (%) <input type="checkbox"/> Other means <input type="checkbox"/> Senior managing official Function in the company:				
	<input type="checkbox"/> Ownership (%) <input type="checkbox"/> Other means <input type="checkbox"/> Senior managing official Function in the company:				
	<input type="checkbox"/> Ownership (%) <input type="checkbox"/> Other means <input type="checkbox"/> Senior managing official Function in the company:				

2) For any Controlling Person (reportable or not reportable) who has not been previously identified, you are required to provide us with:

- a certified ID of all controlling persons,
- an updated Beneficial Owner form, and
- a structure chart dated and signed by legal representatives (except for Senior Managing Official).

Each natural person signing this Annex 1 expressly authorizes Banking Circle (i) to process his personal data in accordance with the relevant articles of Banking Circle's Privacy Notice available on www.bankingcircle.com and (ii) to disclose the relevant information to the competent tax authorities in accordance with Banking Circle's current legal obligations, including but not limited to CRS.

Individuals have a right of access, rectification, blocking, deletion and objection that may be used as stated in Banking Circle's Privacy Notice available on its website www.bankingcircle.com.

* Mark N/A if your country of tax residence does not issue a TIN or "Applied for" if you have applied for a TIN (you will then be required to provide your TIN within 90 days).



Glossary

These definitions are based on the OECD Common Reporting Standard for the Automatic Exchange of Financial Account Information ("The Common Reporting Standard" or "CRS").

If you have any questions about these definitions or require further details, please contact your tax advisor.

"CRS"

The Common Reporting Standard (CRS) is a standard proposed by the OECD with the objective of developing a system for the automatic exchange of information in order to guarantee greater fiscal transparency. The CRS was adopted by the European Union through the Directive regarding the mandatory automatic exchange of information in the field of taxation (Directive 2014/107/EU), also known as "DAC 2". The Directive has been transposed into Luxembourg law (law voted on 9 December 2015).

"CRS Jurisdiction"

A CRS jurisdiction is a jurisdiction that signed a Competent Authority Agreement. It includes all European Union Member States (by application of Directive 2014/107/UE).

"Non-Participating CRS Jurisdiction"

This term refers to a Jurisdiction that is not a EU Member State and that has not concluded an agreement on the automatic exchange of financial information.

"Financial Institution"

The term "Financial Institution" means a "Depository Institution", a "Custodial Institution", an "Investment Entity", or a "Specified Insurance Company", as defined below:

5. The term "Depository Institution" means any Entity that accepts deposits in the ordinary course of a banking or similar business.
6. The term "Custodial Institution" means any Entity that holds, as a substantial portion of its business, Financial Assets on behalf of others.
7. The term "Investment Entity" means any Entity:
 - a) which primarily conducts one or more of the following activities or operations for or on behalf of a customer:
 - i. trading in money market instruments (cheques, bills, certificates of deposit, derivatives, etc.); foreign exchange; foreign exchange, interest rate and index instruments; transferable securities; or commodity futures trading;
 - ii. individual and collective portfolio management; or
 - iii. otherwise investing, administering, or managing Financial Assets or money on behalf of other persons;
 - b) the gross income of which is primarily attributable to investing, reinvesting, or trading in Financial Assets, if the Entity is managed by another Entity that is a Depository Institution, a Custodial Institution, a Specified Insurance Company, or an Investment Entity.

An investment entity includes an entity that functions as an investment fund, such as private equity fund, venture capital fund, leverage 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 investments purposes.

The term "Specified Insurance Company" means any Entity that is an insurance company (or the holding company of an insurance company) which issues a Cash Value Insurance Contract or an Annuity Contract.

"Reporting Financial Institution"

Under CRS, this term corresponds to a FI that does not qualify as a Non-Reporting FI.

"Non-Reporting Financial Institution"

Under CRS, the term "Non-Reporting Financial Institution" means any Financial Institution which is:

8. a Broad Participation Retirement Fund; a Narrow Participation Retirement Fund; a Pension Fund of a Public Entity, International Organisation or Central Bank; or a Qualified Credit Card Issuer;
9. any other Entity that presents a low risk of being used to evade tax, included in the list of Non-Reporting Financial Institutions published in the Official Journal of the European Union (OJ);
10. an Exempt Collective Investment Vehicle which generally refers to an Investment Entity that is regulated as a collective investment vehicle, provided that all of the interests in the collective investment vehicle are held by or through individuals or Entities that are not Reportable Persons, except a Passive NFE with Reportable Controlling Persons; or
11. a trust to the extent that 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.

"Investment entity resident in a non-CRS jurisdiction and managed by another Financial Institution"

This term refers to an Investment entity that is not a participating Jurisdiction Financial Institution, whose gross income is primarily attributable to investing, reinvesting, or trading in Financial Assets. The Entity is managed by another Entity that is a Depository Institution, a Custodial Institution, a Specified Insurance Company, or another Investment Entity.

"NFE"

Means "Non-Financial Entity" under CRS and corresponds to any Entity that is not a Financial.

"Active NFE"

The term "Active NFE" means, notably, any NFE that meets any of the following criteria:

- a) Active operating company:
A company that generates 50% or more of its gross income from active operations (as opposed to investments), and less than 50% of the assets held by the entity during the preceding calendar year or other appropriate reporting period are assets that produce or are held for the production of passive income. A Financial Institution is not an active operating company.
- b) Holding or financing company of a non-financial group:
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 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.
- c) Start-up companies:
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 24 months following the date of its incorporation.

- d) Entity in liquidation or reorganization:
The NFE has not been a Financial Institution for 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.
- e) Treasury centre of a non-financial group:
The NFE primarily engages in financing and hedging transactions with, or for, Related Entities that are not Financial Institutions, provided that the group of any such Related Entities is primarily engaged in a business other than that of a Financial Institution.
- f) Non-profit NFE.

If the NFE does not fulfil any of the above requirements, the entity is considered a Passive NFE.

"Passive NFE"

Under CRS, a "Passive NFE" means any: (i) NFE that is not an Active NFE; or (ii) an Investment Entity in a non-CRS Jurisdiction.

"Passive income"

Passive income generally includes a portion of gross income that consists of:

- 12. dividends and dividend substitute payments;
- 13. interest and income equivalent to interest;
- 14. rents, royalties and annuities;
- 15. the excess of gains over losses from the sale or exchange of Financial Assets that gives rise to the passive income;
- 16. the excess of gains over losses from transactions (futures, forwards, options, and similar) in any Financial Assets;
- 17. the excess of foreign currency gains over foreign currency losses;
- 18. net income from swaps; or
- 19. amounts received under Cash Value Insurance Contracts.

Notwithstanding the foregoing, passive income will not include, in the case of a NFE that regularly acts as a dealer in Financial Assets, any income from any transaction entered into in the ordinary course of such dealer's business as such a dealer.

"Publicly listed company"

The stock of the NFE is traded on a regulated financial market or the NFE is a Related Entity of an entity the stock of which is traded on a regulated financial market.

"Related Entity"

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

"Control"

"Control" over an Entity is generally exercised by the natural person(s) who ultimately has(have) a controlling ownership interest in the Entity. Where no natural person(s) exercise(s) control through ownership interests, the Controlling Person(s) of the Entity will be the natural person(s) who exercise(s) control of the Entity through other means. Where no natural person(s) is(are) identified as exercising control of the Entity, the Controlling Person(s) of the Entity will be the natural person(s) who hold(s) the position of senior managing official.

The term “Controlling Persons” shall be interpreted in a manner consistent with the Financial Action Task Force Recommendations.

“Controlling Person”

The “Controlling Person” is the natural person who exercises control over an entity. Every entity has at least one controlling person.

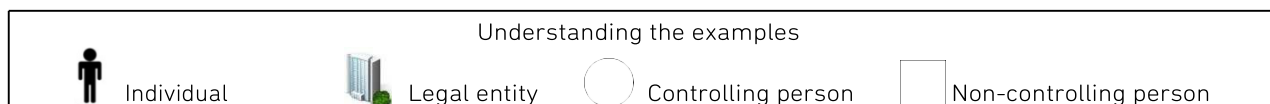
This definition corresponds to the term “beneficial owner” as described in Recommendation 10 of the Financial Action Task Force Recommendations (as adopted in February 2012) and as stated in the AML Luxembourg law dated 12 November 2004.

The Luxembourg law of 12 November 2004 provides that “beneficial owner” means any natural person who ultimately owns or controls the customer and/or any natural person on whose behalf a transaction or activity is being conducted. The beneficial owner shall at least include, in the case of corporate entities:

- (i) any natural person who ultimately owns or controls a legal entity through direct or indirect ownership or control over a sufficient percentage of the shares” (property) “or voting rights” (other means) “in that legal entity, including through bearer share holdings, other than a company listed on a regulated market that is subject to disclosure requirements consistent with Community legislation or subject to equivalent international standards; a percentage of more than 25% shall be deemed sufficient to meet this criterion;
- (ii) any natural person who otherwise exercises control over the management of a legal entity” (senior executive).

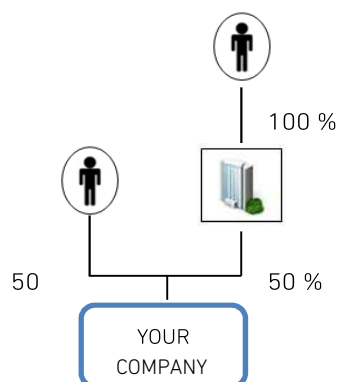
In the case of a trust, the Controlling Person designates the settlor(s), the trustee(s), the protector(s) (if any), the beneficiary(ies) or class(es) of beneficiaries, or any other natural person(s) exercising ultimate effective control over the trust, regardless of whether or not they exercise control over the Trust. In the case of a legal arrangement other than a trust, such a term means persons in equivalent or similar positions.

The following charts provide non-exhaustive examples of the controlling-person definition



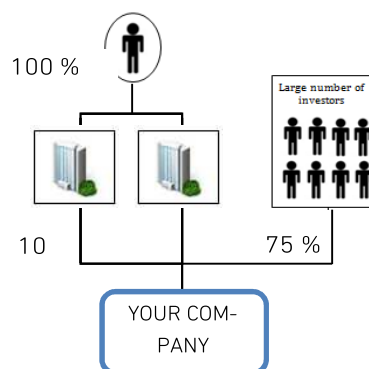
Example 1

Direct or indirect ownership



The two natural persons are controlling persons since they are both individuals owning more than 25% of the shares of the company, either directly or indirectly.

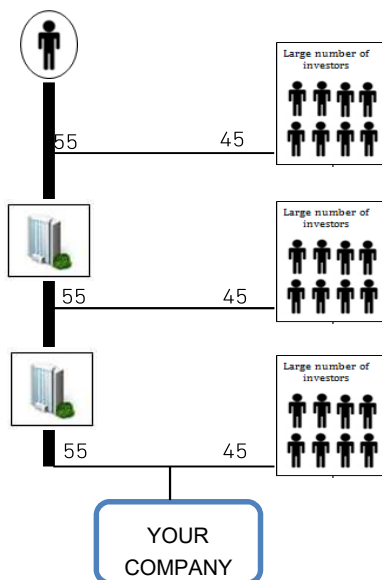
Example 2 Indirect ownership



The controlling person in this example indirectly owns 25% (15% + 10%) of the company.

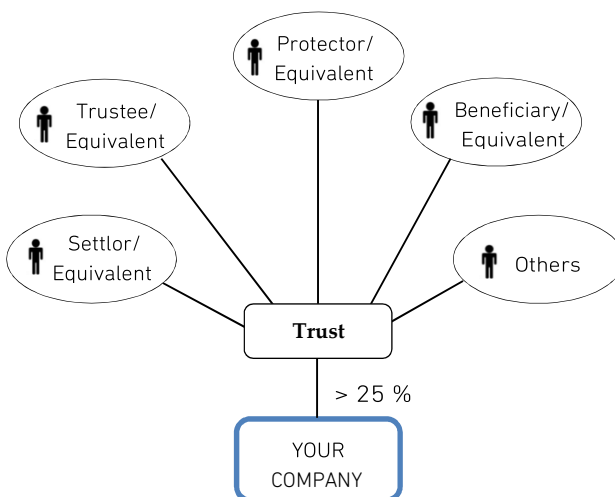
Example 3 Indirect ownership

Other means (significant part of the shares / voting rights)



No individual owns more than 25% of the shares. The controlling

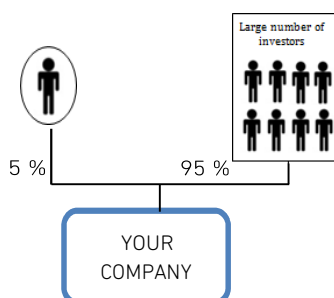
Example 4 Trust structure



When your company is held (>25%) by a Trust, the controlling person of the Trust is considered to control your company. A controlling person in a Trust is the Settlor AND the Trustee AND the Protector AND the Beneficiary AND any other person controlling the Trust. If the controlling person is an entity, you must identify the controlling persons of the entity. Same rules apply to a foundation/stitching.

Example 5

Control via other means

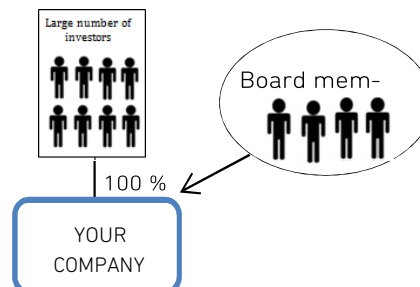


No individual owns more than 25% of the shares.

The controlling person here is a retired founder of the company. Preference shares allow him/her to exercise a veto on all decisions of the other shareholders.

Example 6

Senior managing official



No shareholder owns more than 25% of the shares. The members of the board influence/control the management of the company.

"Reportable Person"

Any person that is a tax resident outside Luxembourg or any US person.

"Tax resident"

A person is always a tax resident in at least one country.

An entity is a Tax Resident in a jurisdiction when it is considered a resident under a tax law of that jurisdiction and when it pays taxes to said jurisdiction. The concept of tax residency may differ from jurisdiction to jurisdiction.

Common international criteria that may be factored into tax residency include:

- domicile in a jurisdiction; OR
- place of incorporation/organisation; OR
- nationality.

It should be noted that a temporary stay in a jurisdiction can contribute to tax residency. Further, it is possible to be considered a Tax Resident in more than one jurisdiction. Government officials, diplomats and military personnel are generally Tax Residents in their home jurisdiction. The current determination of the tax residency is established on the basis of the local tax legislation.

You can look up the conditions in the local legislation or on the following website: www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/tax-residency/

Legal arrangements and tax residency:

An entity such as a legal arrangement, that has no residence for tax purposes (transparent entity) is a tax resident for CRS purposes in the jurisdiction in which its place of effective management is located. If there is no central administration, the address of its principal office can serve as a proxy for determining residence.

We are not allowed to provide tax advice to determine a client's tax residence. Please consult a tax advisor if you are not sure about your tax residence.

"TIN"

The 'Taxpayer Identification Number' (TIN) is the taxpayer identification number for tax administration purposes. If the country of tax residence does not issue a TIN, please indicate a Functional Equivalent.

You can find more information regarding Taxpayer Identification Numbers at www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/tax-identification-numbers/

"Functional Equivalent"

While many jurisdictions utilise a TIN for personal or corporate taxation purposes, 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 individuals, a social security/insurance number, citizen/personal identification/service code/number, and resident registration number.

You can find more information regarding TINs at: www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/tax-identification-numbers/

Further information:

OECD website dedicated to the automatic exchange of financial information: <http://www.oecd.org/tax/automatic-exchange/>

To comply with the regulations, we kindly ask you to complete this form and sent it back to kyc@bankingcircle.com or by mail: