



UNION BANCAIRE PRIVÉE

Tax Residency Self-Certification Form for Legal Entities

General Information and Instructions

1. Definitions

“**Relevant Jurisdiction**” means the location of the account(s) to which this form relates, as confirmed in Part 1 of this form below.

“**Relevant Tax Authority**” means the competent tax authority/authorities of the Relevant Jurisdiction.

2. General Background

Under the applicable regulations under the Organization for Economic Cooperation and Development’s (OECD) Automatic Exchange of Information (AEOI) and Common Reporting Standard (CRS), Union Bancaire Privée, UBP SA (the “**Bank**”) is obliged under the laws and regulations of the Relevant Jurisdiction, to collect certain information relating to the tax status and residency of its clients.

Definitions have been provided in the Appendix to this form to assist you with the completion of this form, classifying the entity holding the account (the “**Entity**” or “**Account Holder**”) and to explain certain terms specific to the AEOI.

If the Account Holder and/or, in some cases, one or more individual(s) who exercise control over the Account Holder (the “**Controlling Person**”) is/are resident for tax purposes in one or more countries that have signed an AEOI agreement with the Relevant Jurisdiction the Bank will be required to report information concerning the following to the Relevant Tax Authority from 2018 (based on data collected from 1 January 2017):

- i. The Account Holder/Controlling Person;
- ii. The Account Holder’s Financial Account(s)/the Financial Account(s) to which the Controlling Person is linked and, in particular, the balance and income at certain dates.

This information will then be passed to the tax authorities in the Account Holder’s/Controlling Person’s country/countries of residence for tax purposes.

Under the AEOI, if the Account Holder/Controlling Person is not resident in a country that has signed an agreement with the Relevant Jurisdiction, no information about these individuals will be automatically passed on to the Relevant Tax Authority. There will therefore be no automatic exchange of information with the tax authorities in the country or countries where the Account Holder/Controlling Person, is resident for tax purposes. However, information may under certain conditions be disclosed to the Account Holder’s/Controlling Person’s tax authorities in response to a request based on, in particular, a double taxation treaty. **In this respect, such information may also pertain to closed accounts.**

3. Instructions for completing the form

The Relevant Tax Authority requires the Bank to determine the tax status and residency of any Account Holders and Controlling Persons in accordance with the CRS. The Bank therefore asks you to kindly complete all sections of this form for the person identified as the Entity/Account Holder.

Furthermore, please note that if the Account Holder is classified as a passive Non-Financial Entity (NFE) under the CRS¹ then you will also be obliged to provide details of the controlling person(s) using the separate *Tax Residency Self-Certification Form for Individual Account Holders and Controlling Persons* for that Account Holder. Please use a separate form for each Account Holder/Controlling Person.

Important:

This form has significant legal and tax-related consequences for you and for the Bank: please complete it with the utmost care and, if needed, seek counsel from a professional tax advisor. Under no circumstances should this form, or any written or verbal explanation relating to it, be construed as tax advice. If you have any questions about this form or about the Account Holder’s/Controlling Person’s tax residency status, we recommend you contact a tax advisor or the tax authorities.

¹ This will include a Professionally Managed Investment Entity in a non-participating jurisdiction. Please see the Appendix of this form for a full definition of a Passive NFE.



UNION BANCAIRE PRIVÉE

Tax Residency Self-Certification Form for Legal Entities (continued)

Furthermore, please note:

- ◆ **Do not use this form if the Account Holder is an individual or a sole trader.** In these cases, please complete and submit the *Tax Residency Self-Certification Form for Individual Account Holders and Controlling Persons*.
- ◆ **If the individual Account Holder is a US taxpayer, or has other connections with the US, it may be a “Specified US Person”** under US Internal Revenue Service (IRS) regulations and, if so, an IRS Form W-9 must also be completed along with the Statement of Tax Compliance.
- ◆ If the Account Holder’s tax residency cannot be clearly established by application of the AEOI provisions, please note that the Bank will be obliged to report the Account Holder based on the indications of tax residence defined in the CRS. If the indications of tax residence show a connection to one or more Reportable Jurisdictions, the information about the Account Holder may be passed on to each of said jurisdictions.
- ◆ If the Account Holder is classified as a Passive NFE and the Bank has not been given the required self-certification for the Controlling Person(s), please note that the Bank will be obliged to report the Controlling Person(s) based on the indications of tax residence showing a link with one or more jurisdictions subject to reporting. Information about the Controlling Person(s) may then be sent to each of these jurisdictions.
- ◆ Should circumstances change and make the information contained in this form incorrect, please provide the Bank with a duly updated self-certification form within 30 days of such change in circumstances.

Part 1 – Identification of the Account Holder

The Bank reserves the right to reject this form if it contains information that contradicts details in its possession.

Location of the account(s) opened with the Bank to which this form relates to (*please list all that apply*):

A. Legal name

B. Country of incorporation or organization

C. Permanent residence address (do not use PO box or “care of” addresses unless these are registered on the commercial register)

Address Line 1 _____

Address Line 2 _____

Zip Code _____

Town/City _____

Country _____



Tax Residency Self-Certification Form for Legal Entities (continued)

Part 2 – Countries/Jurisdictions of residence for tax purposes and related Taxpayer Identification Numbers (TINs)

Please complete the following table stating (i) **all** countries/jurisdictions where the Account Holder is tax resident and (ii) the Account Holder's Taxpayer Identification Number (**TIN**), or equivalent number, for each country/jurisdiction indicated. **It is mandatory to indicate all relevant countries/jurisdictions.**

Each country/jurisdiction defines tax residence in accordance with its own rules. In this respect, the countries/jurisdictions concerned have provided information on the dedicated OECD Automatic Exchange Portal² about the rules for attaching an Entity to a tax residence within the country/jurisdiction in question. **For a full definition of the term "Country/jurisdiction of tax residence" and any terms used below, please refer to the Appendix.**

If the Account Holder is not resident for tax purposes in any country/jurisdiction (e.g. because it is fiscally transparent), please provide its place of effective management or the country/jurisdiction in which its principal office is located.

If the Account Holder is a trust without its own tax jurisdiction, please indicate the country/jurisdiction of tax residence of the trustee or trustees (if there are more than one) and leave the other two columns blank.

If it is not possible to specify a TIN in the table for each country/jurisdiction of tax residence, please indicate the reason in the right-hand column.

Reason A – The country/jurisdiction of tax residence specified does not issue TINs to its residents.

Reason B – The Account Holder/Controlling Person is unable to obtain a TIN or equivalent number or is in the process of being issued one (please explain why a TIN has not (yet) been obtained). If the TIN is in the process of being obtained, the TIN must be given to the Bank within 90 days.

Reason C – The TIN is not required (note: only select this reason if the domestic law of the relevant country/jurisdiction does not require the collection of the TIN issued by such country/jurisdiction).

	Country/jurisdiction of tax residence ³	TIN	If no TIN is provided, please state the reason (A, B or C). If you select Reason B, please explain why you have not (yet) been able to obtain a TIN.
1			
2			
3			

By signing this form, I certify that the Account Holder/Controlling Person identified is resident for tax purposes only in the country(-ies)/jurisdiction(s) listed above.

² The attachment rules for each country can be seen at the following link: <https://www.oecd.org/tax/automatic-exchange/>

³ If the Account Holder has more than three countries/jurisdictions of residence for tax purposes, please use and sign a separate page. This additional page will then form an integral component of this self-certification.



Tax Residency Self-Certification Form for Legal Entities (continued)

Part 3 – Status

a) Is the Entity a Professionally Managed Investment Entity (PMIE)?

In general, Entities that are typically treated as PMIEs include private investment vehicles and collective investment vehicles (e.g. private investment companies, trusts, foundations or investment funds) that are professionally managed, e.g. because they have concluded a discretionary asset management mandate with a Financial Institution (with the Bank or with an external asset manager). **For the full definition of the term “Professionally Managed Investment Entity” and any terms used below, please refer to the definitions in the Appendix.**

Yes

i) If the Entity is resident in a Participating Jurisdiction⁴ → **please complete Part 4**

ii) If the Entity is resident in a Non-Participating Jurisdiction → **please go straight to point (d) and complete the “Tax Residency Self-Certification Form for Controlling Persons”, or have it completed.**

No → **Please go to point (b)**

b) Does the Entity come under the “Other types of financial institutions” category?

“Other types of financial institutions” include in particular Depository Institutions, Custodial Institutions, Managing Investment Entities and Specified Insurance Companies. Such Entities may be banks, brokers, investment managers/advisors and life insurance companies. **For the full definition of Depository institutions, Custodial Institutions, Managing Investment Entities and Specified Insurance Companies, please refer to the definitions in the Appendix.**

Yes → **Please complete Part 4**

No → **Please go to point (c)**

c) Please confirm the Entity’s Non-Financial Entity (NFE) status (by ticking the appropriate box):

Active NFE since the Entity is:

An Active NFE by reason of income and assets → **Please complete Part 4**

A publicly traded NFE – publicly traded corporation

Please provide the name of the established securities market on which the NFE is regularly traded below and **complete Part 4.**

A non-financial corporation that is a Related Entity of a publicly traded corporation

A NFE (other than a corporation) that is a Related Entity of a publicly traded corporation.

In both cases, please provide the name of the publicly traded corporation of which the Entity is a Related Entity:



Tax Residency Self-Certification Form for Legal Entities (continued)

Please also provide the name of the established securities market on which the corporation is traded and **complete Part 4**

- A Government Entity or Central Bank → **Please complete Part 4.**
- An International Organization → **Please complete Part 4.**
- A Holding Entity that is a member of a non-financial group → **Please complete Part 4.**
- A start-up NFE → **Please complete Part 4.**
- An NFE that is liquidating or emerging from bankruptcy → **Please complete Part 4.**
- A treasury center that is a member of a non-financial group → **Please complete Part 4.**
- A Non-Profit Entity → **Please complete Part 4.**
- Passive NFE → **Please go to point (d) and complete the “Tax Residency Self-Certification Form for Controlling Persons” or have it completed.**

d) Please list the Controlling Persons for the Professionally Managed Investment Entity resident in a non-Participating Jurisdiction or the Passive NFE⁵.

In the table below, please indicate the name, date of birth and status of each Controlling Person, specifying the appropriate letter from the list below.

Please also complete the “Tax Residency Self-Certification Form for Controlling Persons”, or have it completed, for each Controlling Person and return it to the Bank.

Surname – First name	Date of birth (dd/mm/yyyy)	Status of the Controlling Person (see 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

N.B.1: If the Account Holder is an underlying Entity of a trust, the Controlling Person type will be one of the types listed under points d. to h.

N.B.2: If the Account Holder is an Entity underlying a (non-trust) legal arrangement, the Controlling Person will be one of the types listed under points i. to m.

⁵ If the Account Holder has more than five Controlling Persons, please use a separate, signed sheet. This additional page will then form an integral component of this self-certification.
⁶ Non-trust legal arrangements include, for example, foundations or fideicommissa.



UNION BANCAIRE PRIVÉE

Tax Residency Self-Certification Form for Legal Entities (continued)

Part 4 – Declarations and Signature

I understand that the information supplied by me will be covered by the full provisions of CRS laws and regulations of the Relevant Jurisdiction which set out how the Bank may use and share such information.

I acknowledge and accept that the information contained in this form and information regarding the account(s) may be reported to the Relevant Tax Authority and thereafter exchanged with the tax authorities of another country or countries in which the Account Holder(s) or Controlling Person(s) may be tax resident if that/those country (ies) has/have entered into Agreements to exchange financial account information.

Should the Account Holder's circumstances change and make the information contained herein incorrect, I undertake to provide the Bank with a suitably updated self-certification form promptly and within 30 days of such change in circumstances. I understand that if the information is not corrected, this may lead to reporting to the wrong country, which may have adverse tax consequences for the Account Holder(s) and/or the Controlling Person(s).

As regards Part 3 (d) and the requirement to state the Controlling Person(s), I hereby confirm that I have informed the Controlling Person(s) of the contents of the present form, that he/she/they has/have agreed in particular to the disclosure of his/her/their name(s) and personal data to foreign tax authorities where applicable and as described herein, and that he/she/they acknowledge(s) the requirement for him/her/them to fill in the corresponding self-certification form.

I acknowledge and agree that (a) the information contained in this form is collected and may be kept by the financial institution for the purpose of automatic exchange of financial account information, and (b) such information and information regarding the account holder and any reportable account(s) may be reported by the financial institution to the Relevant Tax Authority and exchanged with the tax authorities of another jurisdiction or jurisdictions in which the account holder may be resident for tax purposes, pursuant to the legal provisions for exchange of financial account information provided under the laws and regulations of the Relevant Jurisdiction.

I undertake to advise the Bank of any change in circumstances which affects the tax residency status of the individual identified in Part 1 of this form or causes the information contained herein to become incorrect, and to provide the Bank with a suitably updated self-certification form within 30 days of such change in circumstances.

I declare that the information given and statements made in this form are, to the best of my knowledge and belief, true, correct and complete (in particular that the Account Holder(s) is/are not tax resident in another country/jurisdiction than the one(s) listed herein).

Signature _____

Name in capitals _____

Date _____

Please indicate the capacity in which you are signing⁷ _____

WARNING:

It is an offence under section 80(2E) of the Hong Kong Inland Revenue Ordinance if any person, in making a self-certification, makes a statement that is misleading, false or incorrect in a material particular AND knows, or is reckless as to whether, the statement is misleading, false or incorrect in a material particular. A person who commits the offence is liable on conviction to a fine at level 3 (i.e. HK\$10,000).

It is an offence under section 105M of the Singapore Income Tax Act (Chapter 134) any individual that is known to provide false or misleading information. An individual who commits the offence is liable to a penalty of a fine not exceeding \$10,000 and/or imprisonment of up to 2 years.

For internal use only (confirmation by Relationship Manager)		
_____	_____	_____
Date	Trigram	Signature

⁷ For example: Director or authorized representative



UNION BANCAIRE PRIVÉE

Tax Residency Self-Certification Form for Legal Entities (continued)

Appendix

“Account Holder”

The term “Account Holder” means the person listed or identified as the holder of a Financial Account. A person, other than a financial institution, holding a Financial Account for the benefit of another person as an agent, a custodian, a nominee, a signatory, an investment advisor, an intermediary, or a legal guardian is not treated as the Account Holder. In these circumstances that other person is the Account Holder. With respect to a jointly held account, each joint holder is treated as an Account Holder.

“Active Non-Financial Entity (NFE)” (“Active NFE”)

The term “Active NFE” means any NFE that meets any of the following criteria:

- a) Active NFE by reason of income and assets: 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) Publicly traded NFE and NFE related to a publicly traded Entity: the stock of the NFE is regularly traded on an established securities market or the NFE is a Related Entity of an Entity with stock that is regularly traded on an established securities market;
- c) Government Entity, International Organization or Central Bank: the NFE is a Government Entity, an International Organization, a Central Bank, or an Entity wholly owned by one or more of the foregoing;
- d) Holding Entity that is a member 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 (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) 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 organization of the NFE;
- f) NFE that is liquidating or emerging from bankruptcy: The NFE was not a Financial Institution in the past five years, and is in the process of liquidating its assets or is reorganizing with the intent to continue or recommence operations in a business other than that of a Financial Institution;
- g) Treasury Center that is a member of a non-financial group: 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) Non-profit Entity: the NFE meets all of the following requirements:
 - 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 is a professional organization, business league, chamber of commerce, labor organization, agricultural or horticultural organization, civic league or an organization 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 Government Entity or other non-profit organization, or escheat to the government of the NFE’s jurisdiction of residence or any political subdivision thereof.

“Collective Investment Vehicle that is an Investment Entity”

An Entity is generally considered an Investment Entity if it operates or behaves like a collective investment vehicle, a mutual fund, an exchange-traded fund, a private equity fund, a hedge fund, a venture capital fund, a leveraged buyout fund or any similar investment vehicle whose strategy consists of investing or reinvesting in financial assets and carrying out transactions with such assets. An Entity whose



UNION BANCAIRE PRIVÉE

Tax Residency Self-Certification Form for Legal Entities (continued)

primary activity consists of carrying out investment, administration or management transactions relating to non-debt direct interests in real estate on behalf of third-parties, such as a real estate investment trust, will not constitute an Investment Entity.

“Controlling Person”

This is a natural person who exercises control over an entity. Where an entity Account Holder is treated as a Passive Non-Financial Entity (“NFE”) then a financial institution must determine whether such Controlling Persons are Reportable Persons. This definition corresponds to the term “beneficial owner” as 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, this term means the settlor(s), the trustee(s), the protector(s), the beneficiary/beneficiaries or the members of a class or classes of beneficiaries and any other individual exercising ultimate effective control over the trust. In the case of a legal arrangement other than a trust, such term means persons in equivalent or similar positions. The members, defined based on characteristics only, of a class of beneficiaries must not be treated as Controlling Persons until the person is known by name (then the rules for beneficiaries known by name will be applied depending on the type of rights). A discretionary beneficiary known by name will only be deemed a Controlling Person for calendar years or other suitable reference periods during which the person actually receives a distribution. A discretionary beneficiary must therefore be documented using the “Tax Residency Self-Certification Form for Individual Account Holders and Controlling Persons” in the year in which they receive their first distribution.

Note: Trustees and protectors who are entities (“Corporate Trustees” and “Corporate Protectors”) will not be obliged to identify their own Controlling Persons. Settlers or beneficiaries of a trust or a foundation (or other equivalent legal arrangement) however will be obliged to identify their Controlling Persons. Thus, for example, an entity underlying a trust, foundation or other legal arrangement whose settlor or beneficiary is an entity, must identify the settlor-entity’s or beneficiary-entity’s Controlling Persons and notify the Bank thereof as though they were its own Controlling Persons.

Under AEOI rules, information about Controlling Persons is only required if the Account Holder Entity is:

- i. A Passive NFE
- ii. A Professionally Managed Investment Entity in a Non-Participating Jurisdiction.

“Country/jurisdiction of tax residence”

In general, an individual is deemed tax resident in a country/jurisdiction when, under the laws of said country/jurisdiction (including tax treaties), the individual pays, or should pay, tax on his or her total income because of his or her domicile, residence or any other criterion of a similar nature (i.e. unlimited tax liability) and not solely on sources of income originating from the country/jurisdiction in question.

The tax residence of an Entity is defined by the domestic legislation of the jurisdiction to which it is connected. In general, an Entity will be deemed resident in a jurisdiction for tax purposes when, under the legislation of said jurisdiction, it is liable to pay tax there due to its place of incorporation or organization, the address of its registered office, its principal office or its place of effective management (i.e. unlimited tax liability). On the other hand, an Entity will not be deemed resident in a jurisdiction for tax purposes solely due to the presence of a permanent establishment within said jurisdiction.

In the case of a trust, which is a Financial Institution (whether resident for tax purposes within a participating jurisdiction or not), the trust will be deemed to fall under the jurisdiction of a Participating Jurisdiction if one or more of its trustees are resident within said Participating Jurisdiction, except if the trust provides all reportable information (pursuant to the CRS pertaining to reportable accounts maintained by the trust) to another participating jurisdiction as a result of the trust’s tax residence within that participating jurisdiction.

In the event of a conflict of residence between multiple jurisdictions, the double taxation treaties applicable between the jurisdictions in question should be referred to in order to determine which one takes precedence.

For further information about tax residence rules applicable within the OECD countries, please see the following link: <http://www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/tax-residency/>

“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. An Entity holds Financial Assets for the account of others as a substantial portion of its business if 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 (if shorter than three years).

“Depository Institution”

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



UNION BANCAIRE PRIVÉE

Tax Residency Self-Certification Form for Legal Entities (continued)

“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 Tax Regulations for the countries in question and the CRS for further classification definitions that apply to Financial Institutions.

“Participating Jurisdiction Financial Institution”

The term “Participating Jurisdiction Financial Institution” means (i) any Financial Institution that is tax resident in a Participating Jurisdiction, excluding any branch of that Financial Institution that is located outside 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 Non-Financial Entity (NFE)” (“Passive NFE”)

A “Passive NFE” means any NFE that is not an Active NFE. Moreover, an Account Holder that is a Professionally Managed Investment Entity in a Non-Participating Jurisdiction as far the Relevant Jurisdiction is concerned, will be deemed a Passive NFE Account Holder under the CRS.

“Reportable Jurisdiction”

The term “Reportable Jurisdiction” means a country/jurisdiction with which the Relevant Jurisdiction has concluded an agreement obliging that Relevant Jurisdiction to provide information about the residents of that country/jurisdiction and their accounts (reportable accounts). Where the Relevant Jurisdiction is Hong Kong and/or Singapore, the Reportable Jurisdictions can be found in the following list:

For Hong Kong: http://www.ird.gov.hk/eng/tax/aeoi/rpt_jur.htm

For Singapore: <https://www.iras.gov.sg/irashome/crs/#ParticipatingJurisdictions>

“Reportable Jurisdiction Person”

A person 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. In general, an Entity that has no residence for tax purposes (e.g. a tax-transparent partnership) is considered to be resident in the jurisdiction in which its place of effective management is situated.

“Reportable Person”

Under the CRS a “Reportable Person” is defined as a “Reportable Jurisdiction Person”, other than

- i. a corporation with stock that is regularly traded on one or more established securities markets;
- ii. a corporation that is a Related Entity of a corporation described in clause (i);
- iii. a Government Entity;
- iv. an International Organization;
- v. a Central Bank; or
- vi. a Financial Institution (except for an Investment Entity as described in Sub Paragraph A(6) b) of Section VIII of the CRS that are not Participating Jurisdiction Financial Institutions, which are treated as Passive NFEs).

“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”

“TIN” stands for Taxpayer Identification Number or may refer to a “functional equivalent” in the absence of a TIN. A TIN is a unique combination of letters and/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 on the OECD Automatic Exchange Portal (<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 use 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.

Note: Further information can be found in the OECD Common Reporting Standard for Automatic Exchange of Financial Account Information (CRS), the associated Commentary to the CRS and domestic guidance. These documents can be viewed (in English and French) respectively on the OECD site in the Exchange of Information section (<http://www.oecd.org/tax/exchange-of-tax-information/>). If you have any questions, please contact a tax advisor or your domestic tax authorities.