

SUBSCRIPTION AGREEMENT

Once completed, this form should be returned to the Administrator along with your completed Anti-Money Laundering Supplement and an applicable Cayman TIA Entity Self-Certification Form (See Appendix F) or Cayman TIA Individual Self-Certification Form (See Appendix G) by: (i) fax or e-mail; with the original to follow by mail to:

For Participating Shares of CARLTON JAMES MOLLITIUM OFFSHORE FUND MANAGER PLATFORM SPC in respect of the Carlton James Diversified Alpha Fund Segregated Portfolio

c/o Mainstream Fund Services(Cayman) Limited.
c/o Oyster Point, Temple Road
Blackrock, Co. Dublin, Ireland
Tel.: +353-1-279 9660 - Fax: +353-1-278 0846

REGISTRATION REQUIREMENTS:

Specify the type of legal ownership by ticking the appropriate box and complete the name(s) and address(es) of the Applicant(s):

- | | |
|--|--|
| <input type="checkbox"/> Single | Name of Subscriber(s): <u>Hydon and Grim Limited</u> |
| <input type="checkbox"/> Tenants in Common | <u>Pension Scheme -Louise Johnson</u> |
| <input type="checkbox"/> Joint Tenants | Registered Address(es): <u>48 Chorley New Road,</u> |
| <input type="checkbox"/> Corporation | <u>Bolton, BL1 4AP</u> |
| <input checked="" type="checkbox"/> Trust | <u>United Kingdom</u> |

I/We hereby apply to invest the sum(s) stated below in the following Classes of Participating Shares of CARLTON JAMES MOLLITIUM OFFSHORE FUND MANAGER PLATFORM SPC (the "Company") on the terms and conditions set out in its Offering Memorandum dated 2 October, 2017 and the Supplement dated 12 December, 2017 and subject to the Company's Memorandum and Articles of Association:

USD Share Class US\$ _____

GBP Share Class GBP£ 16,500.00

I/We hereby declare as follows:-

- (a) that the Participating Shares are not being acquired directly or indirectly in violation of any applicable law, nor by or on behalf of a U.S. Person (as defined in the Offering Memorandum), and that I am /we are Eligible Investor(s) as defined in the Offering Memorandum;
- (b) that I/we are ~~a Permitted U.S. Person as described in the Offering Memorandum; [DELETE IF NOT APPLICABLE]~~ and
- (c) that I/we are not a "Benefit Plan Investor" (namely: (i) "employee benefit plans" as defined in the Employee Retirement Income Security Act of 1974, as amended ("ERISA") and which are subject to the ERISA fiduciary requirements, (ii) "plans" as defined in the Code and which are subject to Section 4975 of the Code, and (iii) entities deemed for any purpose of ERISA or Section 4975 of the Code to hold assets of any "employee benefit plan" or "plan" due to investments made in such entity by such "employee benefit plans" and "plans.")

I/we warrant that I/we have the knowledge, expertise and experience in financial matters to evaluate the risks of investing in the Company and its Classes, am/are aware of the risks inherent in investing in the assets in which the Company on behalf of the Segregated Portfolio will invest, and can bear the loss of my/our entire investment in the Company.

I/we hereby confirm that the source of funds for my/our subscription (i.e. the origin and the means of transfer of the funds that are involved in the transaction e.g. occupation, business activities, proceeds of sale, corporate dividends) is as follows: -

Accrued pension contributions made by former employer and personally from earning received
throughout my career

I/we hereby declare that **I/we** have carefully and fully read the Offering Memorandum and that **I/we** fully understand its contents and the risks described therein. **I/we** hereby acknowledge that the minimum initial investment in the USD Share Class of the Company is USD\$20,000 and the minimum additional subscription amount in respect of the USD Share Class is US\$10,000 and the minimum initial investment in respect of the GBP Share Class is GBP£15,000 and the minimum additional subscription amount in respect of the GBP Share Class is GBP£5,000.

Specified Customers: meaning Credit Institutions (within the meaning of Article 4(1) of the Recast Banking Consolidation Directive or Financial Institutions as defined in Appendix D only: **I/we** hereby undertake to complete and deliver with this application form the relevant undertakings as set out in Appendix D hereto.

Financial Agents, Nominees and Intermediaries (who are not Specified Customers as defined hereinabove but who are regulated by a regulatory body in an Approved Country): **I/we** hereby undertake to complete the undertakings as set out in Appendix E hereto.

Individual subscribers: **I/we** agree that as an individual subscriber **I/we** will produce a certified copy or copies of the relevant passport or passports together with a certified copy of my/our current utility bill(s) (no older than six months), and any other documentation of identity providing detailed verification of my/our identity as requested by the Company or the Administrator in order that they might comply with legislation for the prevention of money laundering from time to time in force. **I/we** acknowledge that the Company reserves the right to request any further information which it considers to be in any way necessary to the process of verification.

I/we acknowledge that the Company reserves the right to charge, at the discretion of the Directors, an initial fee of up to five per cent (5%) of the total subscription monies received.

Corporations: We agree as a corporation, to produce certified copies of the certificate of incorporation and any subsequent change of name (or other document evidencing the existence of a legal entity), Memorandum and Articles of Association, the register of directors or an excerpt from the trade register held at the relevant chamber of commerce and the signatory card verifying the authority of officers to sign on their behalf of the corporate entity together with passports and utility bills as described above for at least two directors or one Director and one authorised signatory, together with certified details of all shareholders holding the issued share capital of the corporate entity, and passports and utility bills as described above for each shareholder who is holding 25% or more of the issued share capital, and verification of the ultimate beneficial owners, and any other relevant documentation as requested by the Company.

Trusts or Partnerships: If the Subscriber is a trust or a partnership, it agrees to produce certified copies of such relevant documentation as the Directors or Administrator may require.

I/we acknowledge that subscription moneys received in advance of a Subscription Day, whether invested immediately or held in subscription accounts, will not attract interest unless otherwise determined by the Directors.

I/we acknowledge that no redemption payment may be made unless the subscription agreement has been received by the Administrator and all of the necessary anti-money laundering checks have been completed. **I/we** acknowledge that the Administrator is also obliged to obtain information on the purpose and intended nature of the business relationship, in order to be in a position to establish the business and risk profile of the investor. The Administrator is also obliged by law to carry out ongoing monitoring in the case of an existing business relationship, which includes the scrutiny of transactions undertaken throughout the course of the relationship in order to ensure that the transactions being undertaken are consistent with the Administrator's knowledge of the investor and of his business and risk profile, including, where necessary, the source of funds as well as ensuring that the documents, data or information held by the Administrator are kept up-to-date.

I/we acknowledge that up-to-date documents are a prerequisite to any Redemption Request being processed and that it is my/our duty to ensure that my/our documents are up-to-date and not outdated, in order to avoid any delays in relation to my/our Redemption Request.

I/we acknowledge that the obligations of the Administrator of the Company are subject to change and as a result additional updated documents may be required during the course of my/our relationship with the Company.

I/We acknowledge that subscription monies ("**Subscription Proceeds**") may be invested promptly after receipt even prior to the issue of Participating Shares and that subject to: (a) receipt by the Company of a satisfactorily completed Subscription Agreement; (b) all other documentation or information required; and (c) approval by the Company of the subscription, the Company may apply my/our Subscription Proceeds for investment from the date of receipt of my/our Subscription Proceeds prior to the determination of Net Asset Value. Accordingly, I/we acknowledge that in the event that the Company or Segregated Portfolio is wound up before I am/we are issued with Participating Shares, I am/we are deemed to have made an irrevocable loan of the Subscription Proceeds to the Company in respect of the Segregated Portfolio and that any claim against the Company in respect of the Segregated Portfolio under the loan shall rank *pari passu* with the claims of other unsecured creditors of the Company in respect of the Segregated Portfolio. I/We further acknowledge and agree that as soon as Net Asset Value is determined, the Company will issue Participating Shares and the loan will be deemed to be repaid. I/We acknowledge that I/we will not receive any interest on the loan or be able to demand its repayment save in the case of a winding up.

I/We hereby declare, represent and warrant that:

- (a) the Participating Shares are to be purchased with funds that are from legitimate sources in connection with our regular business activities and which do not constitute the proceeds of criminal conduct within the meaning given in the Proceeds of Crime Law (as revised) of the Cayman Islands and the Regulations and/or Guidance Notes issued pursuant thereto;
- (b) the amounts being or to be contributed by me/us to the Company were not and are not directly or indirectly derived from activities that may contravene federal, state or international laws and regulations, including anti-money laundering and counter terrorist financing laws and regulations;
- (c) I/we understand and agree that the Company prohibits the investment of funds by any persons or entities that are or are acting, directly or indirectly:
 - (i) on behalf of terrorists or terrorist organisations, including those persons or entities that are included on the List of Specially Designated Nationals and Blocked Persons maintained by the US Treasury Department's Office of Foreign Assets Control ("**OFAC**"), as such list may be amended from time to time, or any Executive Order administered by OFAC;
 - (ii) for a Senior Foreign Political Figure/Politically Exposed Person, any member of a Senior Foreign Political Figure/Politically Exposed Person's immediate family or any close associate of a Senior Foreign Political Figure/Politically Exposed Person, unless the Company or its delegates, after being specifically notified by us in writing that we are such persons, conducts further due diligence, and determines that such investment shall be permitted; or
 - (iii) for a Foreign Shell Bank.

Such persons or entities in (a) through (c) are collectively referred to as "Prohibited Persons";

- (d) I am/we are not, nor is any person or entity controlling, controlled by or under common control with me/us, a Prohibited Person, and
- (e) to the extent I am/we are acting as agent or nominee in connection with this investment, or otherwise have any beneficial owners that are not disclosed to the Company;
 - (i) I/we have carried out due diligence to establish the identities of such beneficial owners;
 - (ii) based on such due diligence, I/we reasonably believe that no such beneficial owners are Prohibited Persons; and
 - (iii) I/we will make available such information and any additional information that the Company may reasonably request such as an Eligible Introducer/Financial Intermediary Form, if signing on behalf of an undisclosed principal.

Beneficial owners will include, but not be limited to: (i) shareholders of a corporation; (ii) partners of a partnership; (iii) members of a limited liability company; (iv) investors in a fund-of-funds; (v) the grantor and beneficiaries of an irrevocable trust; (vi) the individual who established an IRA; (vii) the participant in a self-directed pension plan; (viii) the sponsor of any other pension plan; and (ix) any person being represented by us in an agent, representative, intermediary, nominee or similar capacity. If the beneficial owner is itself an entity, the information and representations set forth herein must also be given with respect to its beneficial owners. In the case of a publicly-traded company, I/we acknowledge that I/we need not conduct due diligence as to its beneficial owners.

- (f) I am/ we are not a member of the public in the Cayman Islands

If any of the foregoing representations and warranties ceases to be true or if the Company no longer reasonably believes that it has satisfactory evidence as to their truth, notwithstanding any other agreement to the contrary, the Company may be obligated to freeze my/our investment, either by prohibiting additional investments, declining or suspending any withdrawal requests and/or segregating the assets constituting the investment in accordance with applicable regulations, or our

investment may immediately be involuntarily withdrawn by the Company, and the Company may also be required to report such action and to disclose my/our identity to OFAC or other authority. In the event that the Company is required to take any of the foregoing actions, I/we understand and agree that I/we shall have no claim against the Company or any of its delegates and each of their respective affiliates, directors, members, partners, shareholders, officers, employees and agents for any form of damages as a result of any of the aforementioned actions.

I/We understand, acknowledge, represent and agree that many jurisdictions are in the process of changing or creating anti-money laundering, embargo and trade sanctions, or similar laws, regulations, requirements (whether or not with force of law) or regulatory policies and many financial intermediaries are in the process of changing or creating responsive disclosure and compliance policies including the FATCA Requirements as defined below (collectively "**Requirements**") and the Company could be requested or required to obtain certain assurances from us, disclose information pertaining to us to governmental, regulatory or other authorities or to financial intermediaries or engage in due diligence or take other related actions in the future.

US Foreign Account Tax Compliance Act/UK IGA/Common Reporting Standard (together "**FATCA**"). I/We agree to promptly provide, and periodically update, at any times requested by the Company on behalf of the Segregated Portfolio, the Investment Manager, the Administrator or their respective authorised agents, any information (or verification thereof) the Company on behalf of the Segregated Portfolio, the Investment Manager, the Administrator or their respective authorised agents deem necessary to comply with (i) any requirement imposed by Sections 1471-1474 of the US Internal Revenue Code of 1986 and any associated legislation, regulations or guidance ("the Code"), and any Treasury Regulations, forms, instructions or other guidance issued pursuant thereto, together with information required pursuant to any legislation or regulations implementing these requirements in the Cayman Islands (together, referred to as US FATCA"), in order to reduce or eliminate withholding taxes under US FATCA; (ii) any provisions imposed under Cayman law arising from the inter-governmental agreement between the Government of the United Kingdom and the Government of the Cayman Islands (the "**UK IGA**"); or (iii) any provisions imposed under Cayman law arising from the multilateral competent authority agreement on automatic exchange of financial account information (the "**MCAA**") in connection with implementation of the OECD's Common Reporting Standard. . I/We acknowledge and agree that any tax withheld pursuant to FATCA from any payment received by the Company on behalf of the Segregated Portfolio or any person in which the Company on behalf of the Segregated Portfolio holds, directly or indirectly, any interest shall be treated as attributable to the Shareholders whose non-compliance or delay with any request by the Company, the Investment Manager, the Administrator or their respective authorised agents for such information or certification resulted in the imposition of such withholding (which, at the Company's, the Administrator's or the Investment Manager's discretion, may be collected from proceeds otherwise payable to such Shareholders from the redemption of Participating Shares or from distribution amounts otherwise payable to such Shareholders) to the greatest extent possible prior to the attribution of any portion of such FATCA withholding to any other Shareholders. I/we further understand and agree that the Company, the Investment Manager, the Administrator or their respective authorised agents, including any of their employees, officers, directors and agents, may disclose and report any information they deem necessary to comply with FATCA to any regulatory authority and/or any third party entitled thereto by law or regulation (whether statutory or not).

I/We understand, acknowledge, represent and agree that it is the Company's policy to comply with Requirements to which it is or may become subject and to interpret them broadly in favour of disclosure

I/We hereby agree, and by reason of owning any Participating Shares will be deemed to have agreed, that I/we will provide additional information or take such other actions as may be necessary or advisable for the Company (in the Company's sole judgment) to comply with any Requirements, related legal process or appropriate requests (whether formal or informal) or otherwise.

I/We hereby consent, and by reason of owning any Participating Shares will be deemed to have consented, to disclosure by the Company, the Administrator, the Investment Manager and their respective authorised agents to relevant third parties of information pertaining to us in respect of Requirements or information requests related thereto.

I/We shall provide the Company, the Administrator the Investment Manager and their respective authorised agents with any additional information which they may reasonably request in connection with tax and/or FATCA regulations/reporting requirements or other similar requirements in order to substantiate any representations made by me/us or otherwise and I/we authorise the Company, the Administrator the Investment Manager and their respective authorised agents to disclose such information relating to this application to such persons as they consider appropriate.

I/We also represent that we shall at all times comply with any Requirements.

"Foreign Shell Bank" means a foreign bank without a physical presence in any country, but does not include a regulated affiliate. A post office box or electronic address would not be considered a physical presence. A regulated affiliate means a foreign shell bank that: (1) is an affiliate of a depository institution, credit union, or foreign bank that maintains a physical presence in the United States or a foreign country, as applicable; and (2) is subject to supervision by a banking authority in the country regulating such affiliated depository institution, credit union, or foreign bank; and

"Senior Foreign Political Figures"/"Politically Exposed Persons" means a senior official in the executive, legislative, administrative, military or judicial branches of a foreign government (whether elected or not), a senior official of a major foreign political party, or a senior executive of a foreign government-owned corporation. In addition, a senior foreign political figure/politically exposed person includes any corporation, business or other entity that has been formed by, or for the benefit of, a senior foreign political figure/politically exposed person. The immediate family of a senior foreign political figure/politically exposed person typically includes the political figure's parents, siblings, spouse, children and in-laws. A close associate of a senior foreign political figure/politically exposed person is a person who is widely and publicly known internationally to maintain an unusually close relationship with the senior political figure/politically exposed person, and includes a person who is in a position to conduct substantial domestic and international financial transactions on behalf of the senior foreign political figure/politically exposed person.

I/we hereby represent and warrant that all evidence of my/our identity and source of funds provided is genuine and all related information and/or documentation furnished and to be furnished is accurate.

I/we hereby hold harmless and fully indemnify the Company and the Administrator and the Investment Manager (and each of their respective subsidiaries, affiliates, directors, officers, shareholders, employees, agents and permitted delegates) against any loss, liability, damage, cost or expense (including legal fees and expenses) incurred as a result of any failure to provide any requested identification information or source of funds information.

Where I/we accept the offer as nominee for another (a "**Beneficial Holder**"), I/we hereby acknowledge that the confirmations, representations and warranties given by me/us pursuant to this Subscription Agreement are given both on behalf of me/us and also separately on behalf of each of the Beneficial Holder(s) and consequently, where appropriate, references to me/us in this Subscription Agreement shall be read as references to each of the Beneficial Holder(s). I/we further represent and warrant that I/we have all requisite power and authority from said Beneficial Holders to execute and perform the obligations under this Subscription Agreement.

I/we agree to indemnify and hold harmless Indemnified Persons (as defined herein below), against any loss, liability, cost or expense (including attorneys' fees, taxes and penalties) which may result, directly or indirectly, from any misrepresentation or breach of any condition, covenant or agreement set forth herein or in any other document delivered by me/us to any of the Indemnified Persons.

I/We acknowledge that each segregated portfolio of the Company is a segregated portfolio of assets, wholly separate and distinct from any other segregated portfolio of the Company and accordingly the assets of each Segregated Portfolio may only be applied to satisfy the liabilities created by that particular Segregated Portfolio. Accordingly, I/we acknowledge that in the event of any claim whatsoever or howsoever made by me/us against the Company in connection with this Subscription Agreement (whether without prejudice to the foregoing generality, for breach of agreement, an indemnity claim, or a claim for costs or expenses or otherwise) or otherwise, we shall be entitled to have recourse to the Segregated Portfolio assets contained in the Segregated Portfolio without any further recourse to the Company or any other Segregated Portfolios of the Company.

I/We hereby agree that any Indemnified Person not being a party to this Subscription Agreement, may in accordance with the Contracts (Rights of Third Parties) Law (2014) (as amended) enforce any rights granted to it pursuant to this Subscription Agreement in its own right as if it were a party to this Subscription Agreement. Notwithstanding any term of this Subscription Agreement, the consent of or notice to any person who is not a party to this Subscription Agreement shall not be required for any termination, rescission or agreement to any variation, waiver, assignment, novation, release or settlement under this Subscription Agreement at any time.

The Company, the Investment Manager, the Administrator and their respective directors, officers, shareholders, partners, agents and employees are each an "**Indemnified Person**" and together, the "**Indemnified Persons**".

The rights, obligations and relationships of the parties under the Articles and the Offering Memorandum shall be governed by and construed in accordance with the laws of the Cayman Islands.

PAYMENT INSTRUCTIONS:

Payment in full for the amount subscribed for the Participating Shares of the Company (in the amount of US\$20,000 in respect of an initial subscription) in respect of the **USD Share Class** is to be made in US Dollars by bank wire transfer to the Company's bank account as follows:

	Carlton James Mollitium Offshore Fund Manager Platform SPC obo Carlton James Diversified Alpha Fund Segregated Portfolio
Intermediary bank details	The Bank of New York Mellon One Wall Street

	New York, NY10286
Account	890 1050 210
SWIFT	IRVTUS3N
Fedwire ABA	021000018
Beneficiary Bank Details	DMS Bank & Trust Ltd. 20 Genesis Close Grand Cayman KY1-1104
SWIFT	CAYIKYKY
Beneficiary name	Account Carlton James Mollitium Offshore Fund Manager Platform SPC obo Carlton James Diversified Alpha Fund SP
Beneficiary No.	Account 01906100
Reference	"Name of Investor"

Payment in full for the amount subscribed for the Participating Shares of the Company (in the amount of GBP£15,000 in respect of an initial subscription) in respect of the **GBP Share Class** is to be made in **GBP** by bank wire transfer to the Company's bank account as follows:

	Carlton James Mollitium Offshore Fund Manager Platform SPC obo Carlton James Diversified Alpha Fund Segregated Portfolio
Intermediary bank details	The Bank of New York Mellon, London
SWIFT	IRVTGB2X
IBAN	GB24IRVT70022574299860
Beneficiary Bank Details	DMS Bank & Trust Ltd. 20 Genesis Close Grand Cayman KY1-1104
SWIFT	CAYIKYKY
Beneficiary name	Account Carlton James Mollitium Offshore Fund Manager Platform SPC obo Carlton James Diversified Alpha Fund SP
Beneficiary No.	Account 01906101
Reference	"Name of Investor"

OTHER PARTICULARS:

Mailing Address for Share Registration (if different from above):

Downsview House, Broad Bush, Blunsdon, Wiltshire, SN26 7DH

.....

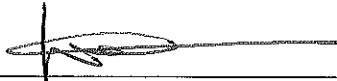
Telephone: 07787895574..... Fax:

Email Address: loujohnsonblunsdon@gmail.com

Date of Subscription:

Name and Address of Remitting Bank: Hydon and Grim Limited Pension Scheme, Allied Irish Bank (GB)
St. Jame's House, Charlotte Street, Lancashire, M1 4DZ.....

SIGNATURES:



Please nominate account details for settlement of redemptions (redemption payments will only be made to an account in the name of a Shareholder and not a third party):-

Name and Address of Receiving Bank: Hydon and Grim Limited Pension Scheme.....
Allied Irish Bank (GB), St. James's House, Charlotte Street,.....
Lancashire, M1 4DZ.....

SWIFT/BIC: AIBKGB2L.....

Account Name: Hydon and Grim Limited Pension Scheme.....

IBAN: GB87AIBK23839604919088.....

Please indicate below how you would like to receive your statements:

- ☐ Normal mail
- ☐ Fax
- ☒ Email
- ☐ Internet Access
- ☐ I do not wish to receive a statement

REDEMPTION REQUEST

For Participating Shares of CARLTON JAMES MOLLITIUM OFFSHORE FUND MANAGER PLATFORM
SPC

c/o MainstreamFund Services (Cayman) Limited
c/o Oyster Point, Temple Road
Blackrock, Co. Dublin, Ireland
Tel.: +353-1-279 9660 - Fax: +353-1-278 0846

Dear Sirs:

I/We hereby request the redemption of Participating Shares of the Company corresponding to the Carlton James Diversified Alpha Fund Segregated Portfolio as specified below:

Number of Participating Shares to be redeemed:-

USD Share Class _____

GBP Share Class _____

OR

I/We hereby request the redemption of:

US\$ _____ worth of Participating Shares of USD Share Class

GBP£ _____ worth of Participating Shares of GBP Share Class

Please therefore accept this Redemption Request as written notice of my/our intention to redeem the Participating Shares on the Redemption Day next following the notice period.

I/We look forward to receiving your acknowledgement of receipt of this notice and payment of the net redemption proceeds in accordance with the instructions provided in the attached Redemption Information form following the completion of the Net Asset Valuation calculation, where possible.

I/We understand that the payment will be made by wire transfer in the Dealing Currency to an account in my/our name.

Date: _____

Signature: _____

By (print name): _____

Title: _____

On behalf of (entity): _____

ADDITIONAL SUBSCRIPTION FORM**(To be completed by existing Shareholders instead of Subscription Agreement)**

For Participating Shares of the Company corresponding to Carlton James Diversified Alpha Fund Segregated Portfolio (the "Fund")

Investor Name _____

Investor Address _____

Carlton James Mollitium Offshore Fund Manager Platform SPC
 In respect of Carlton James Diversified Alpha Fund Segregated Portfolio
 c/o Mainstream Fund Services (Cayman) Limited
 c/o Oyster Point, Temple Road
 Blackrock, Co. Dublin, Ireland

Tel.: +353-1-279 9660 - Fax: +353-1-2780846

Email: shs@trinityfundadmin.ie

Date _____

The undersigned hereby subscribes for an additional investment in the Fund in the amount set forth below upon the terms and conditions (i) contained in the undersigned's original subscription documents, (ii) described in the Fund's most recent Offering Memorandum and Supplemental Offering Memorandum, including all exhibits thereto (as it may be amended, supplemented or otherwise modified from time to time), (iii) the Company's Memorandum and Articles of Association and (iv) this request form.

The undersigned hereby restates all of the covenants, representations and warranties made in the undersigned's original subscription documents as if they were made on the date set forth below and certifies that all of the information set forth in the undersigned's original subscription documents and all of the information provided to the Fund in connection with the subscription contemplated thereby remains accurate and complete as of the date set forth below.

Requested Subscription Date: _____

Amount of additional subscription: _____

Class of Shares: _____

Origin and means of funds in relation to your additional subscription (please tick):-

- | | |
|--|--|
| <input type="checkbox"/> business activities | <input type="checkbox"/> investment profits |
| <input type="checkbox"/> life time earnings/salary | <input type="checkbox"/> (lottery) winnings |
| <input type="checkbox"/> gift/inheritance | <input type="checkbox"/> corporate dividends |
| <input type="checkbox"/> sale of real estate | <input type="checkbox"/> other* |

*For other, please specify:

Signed :

Date:

To be completed by Specified Customers*

***Specified Customers: Credit Institutions** (within the meaning of Article 4(1) of the Recast Banking Consolidation Directive) **or Financial Institutions** being (a) an undertaking that carries out one or more of the activities listed in points 2 to 12, 14 and 15 of Annex I to the Recast Banking Consolidation Directive or foreign exchange services, but does not include an undertaking—(i) that does not carry out any of the activities listed in those points other than one or more of the activities listed in point 7, and (ii) whose only customers (if any) are members of the same group as the undertaking, (b) an insurance company that carries out the activities covered by the Life Assurance Consolidation Directive and is authorised in accordance with that Directive, (c) a person, other than a person falling within Article 2 of the Markets in Financial Instruments Directive, whose regular occupation or business is—(i) the provision to other persons of an investment service, within the meaning of that Directive, or (ii) the performance of an investment activity within the meaning of that Directive, (d) an investment business firm within the meaning of the Investment Intermediaries Act 1995 (other than a nonlife insurance intermediary within the meaning of that Act) (e) a collective investment undertaking that markets or otherwise offers its units or shares, (f) an insurance intermediary within the meaning of the Insurance Mediation Directive (other than a tied insurance intermediary within the meaning of that Directive) that provides life assurance or other investment related services, or (g) An Post, in respect of any activity it carries out, whether as principal or agent— (i) that would render it, or a principal for whom it is an agent, a financial institution as a result of the application of any of the foregoing paragraphs, (ii) that is listed in point 1 of Annex I to the Recast Banking Consolidation Directive, or (iii) that would render it, or a principal for whom it is an agent, an investment business firm within the meaning of the Investment Intermediaries Act 1995 (other than a non-life insurance intermediary within the meaning of that Act) if section 2(6) of that Act did not apply), **regulated by a regulatory body in an Approved Country only**).

Approved Countries (which are as follows but may be subject to change from time to time under relevant laws: Australia, Austria, Belgium, Brazil, Canada, Cyprus, Denmark, Finland, France, Germany, Greece, Guernsey, Hong Kong, Iceland, Ireland, Isle of Man, India, Italy, Japan, Jersey, Liechtenstein, Luxembourg, Malta, Mexico, Netherlands, Norway, Portugal, Singapore, South Africa, South Korea, Spain, Sweden, Switzerland, United Kingdom, United States of America).

TO BE COMPLETED BY SPECIFIED CUSTOMERS

I/We declare that I am/we are licensed as _____ (description), under license number _____ by the _____ (regulatory body) under the laws of _____ (country) and am/are thereby subject to regulations and/or guidelines which to the best of my/our knowledge and understanding are in accordance with the Third EU Money Laundering Directive 2005/60/EC on the prevention of money-laundering. I/we confirm that this subscription is made either on our own behalf or on behalf of an underlying investor or group of investors under a discretionary investment management or similar arrangement and that I/we have full discretion and control over the monies being invested.

Signed: _____

Capacity of Signatory (e.g. Director).....

Print Name:

(Please include an original or certified copy of authorised signature list)

By signing this application form the signatory confirms that he/she is duly authorised to sign this declaration on behalf of the Specified Customer

**To be completed by Financial Agents, Nominees and Intermediaries
who are not Specified Customers**

As an agent/nominee/intermediary authorised and regulated in an Approved Country (which are as follows but may be subject to change from time to time under relevant laws: Australia, Austria, Belgium, Brazil, Canada, Cyprus, Denmark, Finland, France, Germany, Greece, Guernsey, Hong Kong, Iceland, Ireland, Isle of Man, India, Italy, Japan, Jersey, Liechtenstein, Luxembourg, Malta, Mexico, Netherlands, Norway, Portugal, Singapore, South Africa, South Korea, Spain, Sweden, Switzerland, United Kingdom, United States of America), acting on behalf of a third party ("Beneficial Owner"), please sign below.

TO BE COMPLETED BY AGENT/NOMINEE/INTERMEDIARY

I/we (name and address of agent/nominee/intermediary) _____

confirm that we are regulated in _____ (insert jurisdiction)

by _____ (name of Regulator).

I/we are obliged under (insert name of legislation) _____ to have appropriate anti money laundering and counter terrorist financing procedures in place. These requirements are equivalent to the standards imposed under the Third EU Money Laundering Directive 2005/60/EC.

I/we are making this application as agent, representative, nominee or intermediary acting on behalf of a Beneficial Owner. We represent that we have all requisite power and authority from the Beneficial Owner to execute and perform the obligations under the Subscription Agreement. We also agree to be liable to the Company and the Administrator and their directors, shareholders, partners, officers and agents for any and all costs, fees and expenses (including legal fees and disbursements) in connection with any damages resulting from our misrepresentation or misstatement contained herein, or the assertion of our lack of proper authorisation from the Beneficial Owner to execute the Subscription Agreement or perform the obligations hereof.

We confirm that (a) I/we have carried out thorough due diligence to establish the identity of all Beneficial Owners on whose behalf we purchase shares in the Company including where relevant the beneficial owner(s) of such Beneficial Owner, (b) I/we have screened such Beneficial Owners to determine whether or not they are a senior foreign political figure/politically exposed person, any member of a senior foreign political figure/politically exposed person's immediate family or any close associate of a senior foreign political figure/politically exposed person and will disclose to you when any such senior political figure/politically exposed person is identified by me/us, (c) I/we confirm that the Beneficial Owner is/is not a U.S. Person, (d) I/we hold the evidence of such identities and status and will maintain all such evidence for at least five years from the date of my/our complete redemption from the Company, (e) I/we acknowledge that those parties to whom we are introducing the Beneficial Owner are relying upon the customer due diligence checks performed by us so as to meet with their own anti-money laundering and counter terrorist financing obligations, (f) I/we will make available upon reasonable request copies of such customer due diligence information obtained by us relating to such Beneficial Owner to the Company/Administrator (g) should our relationship with the subscriber end, we confirm that we will provide you with all identification and verification documentation.

Signed: _____
Capacity of Signatory (e.g. Director).....
Print Name:
(Please include an original or certified copy of authorised signature list)

**By signing this application form the signatory confirms that he/she is duly authorised to sign this declaration
on behalf of the Agent / Nominee/ Intermediary**

Entity Self-Certification**Instructions for completion**

We are obliged under the Tax information Authority Law, the Regulations, and Guidance Notes made pursuant to that Law, and treaties and intergovernmental agreements entered into by the Cayman Islands 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 the sections below as directed 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 Cayman Islands Regulations, Guidance Notes or international 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 accompanying guidelines for completion or contact your tax advisor.

PART I: General**Section 1: Account Holder Identification**

<u>Hydon and Grim Limited Pension Scheme</u>	<u>United Kingdom</u>
Legal Name of Entity/Branch	Country of incorporation/organisation

Current Residence or Registered Address:

<u>48 Chorley New Road</u>	<u>Bolton</u>
Number & Street	City/Town
<u>BL1 4AP</u>	<u>Wiltshire</u>
State/Province/County	Post Code
	Country

Mailing address (if different from above):

<u></u>	<u></u>
Number & Street	City/Town
<u></u>	<u></u>
State/Province/County	Post Code
	Country

PART II: US IGA

Section 2: U.S. Persons

Please tick and complete as appropriate.

- (a) ☐ The entity is a **Specified U.S. Person** and the entity's U.S. federal taxpayer identifying number (U.S. TIN) is as follows: _____.
- (b) ☐ The entity is a U.S. Person that is not a Specified U.S. Person. Indicate exemption¹ _____.

If the entity is not a U.S. person, please also complete Section 3.

Section 3: US FATCA Classification for all Non United States Entities

Please complete this section if the entity is **not** a U.S. Tax Resident

3.1 If the entity is a **Registered Financial Institution**, please tick one of the below categories, and provide the entity's FATCA GIIN at 3.1.1.

- (a) ☐ Cayman Islands or IGA Partner Jurisdiction Financial Institution
- (b) ☐ Registered Deemed Compliant Foreign Financial Institution
- (c) ☐ Participating Foreign Financial Institution

3.1.1 Please provide your *Global Intermediary Identification number (GIIN)*:

_____ (if registration in progress indicate so)

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

- (a) ☐ The Entity is a Sponsored Financial Institution 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.
Sponsoring Entity's Name: _____ Sponsoring Entity's GIIN: _____
- (b) ☐ The Entity is a Trustee Documented Trust. Please provide your Trustee's name and GIIN.
Trustee's Name: _____ Trustee's GIIN: _____
- (c) ☐ The Entity is a Certified Deemed Compliant, or otherwise 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 a Non-Participating Foreign Financial Institution

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

- (a) ☐ The Entity is an **Exempt Beneficial Owner**² Indicate status: _____
- (b) ☐ The Entity is an **Active Non-Financial Foreign Entity**³ (including an Excepted NFFE)
- i. If the Entity is a Direct Reporting NFFE, please provide the Entity's GIIN: _____
- ii. If the Entity is a Sponsored Direct Reporting NFFE, please provide the Sponsoring Entity's name and GIIN.
Sponsoring Entity's Name: _____
Sponsoring Entity's GIIN: _____

¹ Under the US IGA and in the U.S. Internal Revenue Code, Specified US Person does not include: An organization exempt from tax under section 501(a) or any individual retirement plan as defined in section 7701(a)(37); The United States or any of its agencies or instrumentalities; A state, the District of Columbia, a possession of the United States, or any of their political subdivisions, or instrumentalities; A corporation the stock of which is regularly traded on one or more established securities markets, as described in Reg. section 1.1472-1(c)(1)(i); A corporation that is a member of the same expanded affiliated group as a corporation described in Reg. section 1.1472-1(c)(1)(i); A dealer in securities, commodities, or derivative financial instruments (including notional principal contracts, futures, forwards, and options) that is registered as such under the laws of the United States or any state; A real estate investment trust; A regulated investment company as defined in section 851 or an entity registered at all times during the tax year under the Investment Company Act of 1940; A common trust fund as defined in section 584(a); A bank as defined in section 581; A broker; A trust exempt from tax under section 664 or described in section 4947; or A tax-exempt trust under a section 403(b) plan or section 457(g) plan.

² "Exempt Beneficial Owner" means any of the entities listed as such in Annex II.I of the US IGA or Section 1.1471-6 or 1.1471-6T of the U.S. Treasury Regulations. See additional notes in Exhibit A

³ See definition of *Active Non-Financial Foreign Entity* in Exhibit A

(c) ☒ The Entity is a *Passive Non-Financial Foreign Entity*.⁴

If you have ticked 3.3(c) (*Passive Non-Financial Foreign Entity*), please indicate the full name of any *Controlling Person(s)*⁵:

Full Name of any Controlling Person(s)
Louise Johnson

Please complete Part V below providing details of any ultimate Controlling Persons who are natural persons.

⁴ See definition of *Passive Non-Financial Foreign Entity* in Exhibit A

⁵ See definition of *Controlling Person(s)* in Exhibit A

PART III: UK IGA

Section 4: United Kingdom Persons

- (a) ☒ The entity is a **Specified United Kingdom Person** and the entity's United Kingdom identifying tax number is as follows: 00819420RH.
- (b) ☐ The entity is a United Kingdom Person that is not a Specified United Kingdom Person. Indicate exemption⁶ _____.

If the entity is not a U.K. person, please also complete Section 5.

Section 5: UK FATCA Classification for all Non United Kingdom Resident Entities

Please complete this section if the entity is **not** a U.K. Tax Resident.

5.1 ☐ If you **are** a *Financial Institution*⁷, please tick this box.

5.2 ☐ If you are **not** a *Financial Institution*, please confirm the entity's status below by ticking either (a), (b) or (c):

- (a) ☐ The entity is an **Exempt Beneficial Owner**⁸. Indicate status: _____
- (b) ☐ The entity is an **Active Non-Financial Foreign Entity**⁹.
- (c) ☐ The entity is a **Passive Non-Financial Foreign Entity**¹⁰.

If you have ticked 5.2(c) (*Passive Non-Financial Foreign Entity*), please indicate the name of any **Controlling Person(s)**¹¹:

Full Name of any Controlling Person(s)

Please complete Part V below providing further details of any ultimate Controlling Persons who are natural persons

⁶ Under the UK IGA, Specified UK Person does not include: A corporation the stock of which is regularly traded on one or more established securities markets or a member of the same EAG; A depository institution; A broker or dealer in securities, commodities, or derivative financial instruments that is registered as such under the laws of the United Kingdom; or a Non-Reportable United Kingdom Entity as defined in Annex II paragraph V.

⁷ See definition of *Financial Institution* in Exhibit B.

⁸ "Exempt Beneficial Owner" means any of the entities listed as such in Annex II.I of the UK IGA or Section 1.1471-6 or 1.1471-6T of the U.S. Treasury Regulations. See additional notes in Exhibit B.

⁹ See definition of *Active Non-Financial Foreign Entity* in Exhibit B.

¹⁰ See definition of *Passive Non-Financial Foreign Entity* in Exhibit B.

¹¹ See definition of *Controlling Person(s)* in Exhibit B.

PART IV: Common Reporting Standard

Section 6: Declaration of All Tax Residency [repeat any residences indicated in Part II, Section 2 (US) and Part III, Section 4 (UK)]

Please indicate the Entity's place of tax residence (if resident in more than one country please detail all countries and associated tax reference number type and number). Please indicate not applicable if jurisdiction does not issue or you are unable to procure a tax reference number or functional equivalent.

Country/countries of tax residency	Tax reference number type	Tax reference number (e.g. TIN)
United Kingdom	PSTR	00819420RH

If applicable, please specify the reason for non-availability of a tax reference number:

Section 7: CRS Classification

Provide your CRS classification by checking the corresponding box(es). Note that CRS classification does not necessarily coincide with your classification for US or UK FATCA purposes.

7.1 ☒ If the entity is a *Financial Institution*¹², please tick this box.

Specify the type of Financial Institution below:

☒ Reporting Financial Institution under CRS.

OR

☐ Non-Reporting Financial Institution under CRS. Specify the type of Non-Reporting Financial Institution below:

- ☐ Governmental Entity
 - ☐ International Organization
 - ☐ Central Bank
 - ☐ Broad Participation Retirement Fund
 - ☐ Narrow Participation Retirement Fund
 - ☐ Pension Fund of a Governmental Entity, International Organization, or Central Bank
 - ☐ Exempt Collective Investment Vehicle
 - ☐ Trust whose trustee reports all required information with respect to all CRS Reportable Accounts
 - ☐ Qualified Credit Card Issuer
 - ☐ Other Entity defined under the domestic law as low risk of being used to evade tax. Specify the type provided in the domestic law:
-

☐ Financial Institution resident in a Non-Participating Jurisdiction¹³ under CRS. Specify the type of Financial Institution resident in a Non-Participating Jurisdiction below:

¹² See definition of *Financial Institution* in Exhibit C.

¹³ See definition of *Non-Participating Jurisdiction* in Exhibit C.

- (a) ☐ Investment Entity and managed by another Financial Institution¹⁴.
If you have ticked this box please indicate the name of the *Controlling Person(s)*. Please refer to the definition of Controlling Person in Exhibit C.

Full Name of any Controlling Person(s)	(must not be left blank)

Please also complete Part V below providing further details of any ultimate Controlling Persons who are natural persons.

- (b) ☐ Other Investment Entity
(c) ☐ Other Financial Institution, including a Depository Financial Institution, Custodial Institution, or Specified Insurance Company.

7.2 ☐ If the entity is an *Active Non-Financial Entity* ("NFE") please tick this box.

Specify the type of NFE below:

- ☐ Corporation that is regularly traded or a related entity of a regularly traded corporation.
☐ Provide the name of the stock exchange where traded: _____
 If you are a related entity of a regularly traded corporation, provide the name of the regularly traded corporation: _____
☐ Governmental Entity, International Organization, a Central Bank, or an Entity wholly owned by one or more of the foregoing
☐ Other Active Non-Financial Foreign Entity¹⁵

7.3 ☐ If the entity is a *Passive Non-Financial Entity* please tick this box.¹⁶

If you have ticked this box please indicate the name of the *Controlling Person(s)*. Please refer to the definition of Controlling Person in Exhibit C.

Full Name of any Controlling Person(s)	(must not be left blank)

Please complete Part V below providing further details of any ultimate Controlling Persons who are natural persons

Entity Declaration and Undertakings

I/We declare (as an authorised signatory of the Entity) that the information provided in this form is, to the best of my/our knowledge and belief, accurate and complete. I/We 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/we hereby consent to the recipient sharing this information with the relevant tax information authorities.

Authorised Signature: _____ Authorised Signature: _____

¹⁴ The managing Financial Institution must be a Financial Institution other than an Investment Entity type b) defined within the definition of a Financial Institution in Exhibit C.

¹⁵ See definition of *Active Non-Financial Entity* in Exhibit C.

¹⁶ Please see the definition of *Passive Non-Financial Entity* in Exhibit C.

Position/Title: Trustee Position/Title: _____

Date: (dd/mm/yyyy): 04/04/2019 Date: (dd/mm/yyyy): _____

PART V: Controlling Persons
(please complete for each Controlling Person)

Section 8 – Identification of a Controlling Person

8.1 Name of Controlling Person:

Family Name or Surname(s): Johnson

First or Given Name: Louise

Middle Name(s): Georgina

8.2 Current Residence Address:

Line 1 (e.g. House/Apt/Suite Name, Number, Street) Downsview House, Broad Bush,

Line 2 (e.g. Town/City/Province/County/State) Blunsdon

Country: Wiltshire

Postal Code/ZIP Code: SN26 7DH

8.3 Mailing Address: (please complete if different from 8.2)

Line 1 (e.g. House/Apt/Suite Name, Number, Street) _____

Line 2 (e.g. Town/City/Province/County/State) _____

Country: _____

Postal Code/ZIP code: _____

8.4 Date of birth (dd/mm/yyyy) 03/10/1967

8.5 Place of birth

Town or City of Birth Swindon

Country of Birth United Kingdom

8.6 Please enter the legal name of the relevant entity Account Holder(s) of which you are a Controlling Person

Legal name of Entity 1 Hydon and Grim Limited Pension Scheme

Legal name of Entity 2 _____

Legal name of Entity 3 _____

Section 9 – Country of Residence for Tax Purposes and related Taxpayer Reference Number or functional equivalent ("TIN")

Please complete the following table indicating:

(i) where the Controlling Person is tax resident;

(ii) the Controlling Person's TIN for each country indicated; and,

(iii) if the Controlling Person is a tax resident in a country that is a Reportable Jurisdiction(s) then please also complete Section 10 "Type of Controlling Person".

If the Controlling Person is tax resident in more than three countries please use a separate sheet

	Country/countries of tax residency	Tax reference number type	Tax reference number (e.g. TIN)
1	United Kingdom	NI	NP133987A
2			
3			

If applicable, please specify the reason for non-availability of a tax reference number:

Section 10 – Type of Controlling Person

(Please only complete this section if you are tax resident in one or more Reportable Jurisdictions)

Please provide the Controlling Person's Status by ticking the appropriate box.	Entity 1	Entity 2	Entity 3
a. Controlling Person of a legal person – control by ownership	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
b. Controlling Person of a legal person – control by other means	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
c. Controlling Person of a legal person – senior managing official	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
d. Controlling Person of a trust – settlor	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
e. Controlling Person of a trust – trustee	<input checked="" type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
f. Controlling Person of a trust – protector	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
g. Controlling Person of a trust – beneficiary	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
h. Controlling Person of a trust – other	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
i. Controlling Person of a legal arrangement (non-trust) – settlor-equivalent	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
j. Controlling Person of a legal arrangement (non-trust) – trustee-equivalent	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
k. Controlling Person of a legal arrangement (non-trust) – protector-equivalent	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
l. Controlling Person of a legal arrangement (non-trust) – beneficiary-equivalent	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>
m. Controlling Person of a legal arrangement (non-trust) – other-equivalent	<input type="checkbox"/>	<input type="checkbox"/>	<input type="checkbox"/>

Controlling Person Declaration and Undertakings

I acknowledge that the information contained in this form and information regarding the Controlling Person and any Reportable Account(s) may be reported to the tax authorities of the country in which this account(s) is/are maintained and exchanged with tax authorities of another country or countries in which [I/the Controlling Person] may be tax resident pursuant to international agreements 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 statements made in this declaration are, to the best of my knowledge and belief, correct and complete.

I undertake to advise the recipient within 30 days 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 recipient with a suitably updated list and Declaration within 30 days of such change in circumstances.

Signature:



Print name:

Louise Johnson

Date:

04/04/19

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

Capacity:

N/A

EXHIBIT A
US IGA DEFINITIONS

Account Holder means the person listed or identified as the holder of a Financial Account by the Financial Institution that maintains the account. 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 for purposes of this Agreement, and such other person is treated as holding the account. For purposes of the immediately preceding sentence, the term "Financial Institution" does not include a Financial Institution organized or incorporated in a U.S. Territory. In the case of a Cash Value Insurance Contract or an Annuity Contract, the Account Holder is any person entitled to access the Cash Value or change the beneficiary of the contract. If no person can access the Cash Value or change the beneficiary, the Account Holder is any person named as the owner in the contract and any person with a vested entitlement to payment under the terms of the contract. Upon the maturity of a Cash Value Insurance Contract or an Annuity Contract, each person entitled to receive a payment under the contract is treated as an Account Holder.

Active Non-Financial Foreign Entity means any NFFE which is a Non U.S. entity that meets any of the following criteria:

- (a) Less than 50 percent of the NFFE's gross income for the preceding calendar year or other appropriate reporting period is passive income and less than 50 percent of the assets held by the NFFE 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 NFFE is regularly traded on an established securities market or the NFFE is a Related Entity of an Entity the stock of which is traded on an established securities market;
- (c) The NFFE is organized in a U.S. Territory and all of the owners of the payee are bona fide residents of that U.S. Territory;
- (d) The NFFE is a non-U.S. government, a government of a U.S. Territory, an international organization, a non-U.S. central bank of issue, or an Entity wholly owned by one or more of the foregoing;
- (e) substantially all of the activities of the NFFE consist of holding (in whole or in part) the outstanding stock of, and 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 NFFE shall not qualify for this status if the NFFE 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;
- (f) The NFFE 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 NFFE shall not qualify for this exception after the date that is 24 months after the date of the initial organization of the NFFE;
- (g) The NFFE 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;
- (h) The NFFE 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
- (i) The NFFE is an "excepted NFFE" as described in relevant U.S. Treasury Regulations; or
- (j) The NFFE meets all of the following requirements:
 - i) It is established and maintained in its country 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 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 country 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 Entity's country of residence or the Entity's formation documents do not permit any income or assets of the Entity 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 Entity's charitable activities, or as payment of reasonable compensation for services rendered, or as payment representing the fair market value of property which the Entity has purchased; and
 - v) The applicable laws of the Entity's country of residence or the Entity's formation documents require that, upon the Entity's liquidation or dissolution, all of its assets be distributed to a governmental entity or other non-profit organization, or escheat to the government of the Entity's jurisdiction of residence or any political subdivision thereof.

Code means the U.S Internal Revenue Code of 1986, as amended.

Controlling Person means the natural persons who exercise direct or indirect control over an entity. In the case of a trust, such term means the settlor, the trustees, the protector (if any), the beneficiaries or class of beneficiaries, and any other natural person exercising ultimate effective control over the trust, and in the case of a legal arrangement other than a trust,

such term means persons in equivalent or similar positions. The term 'Controlling Persons' shall be interpreted in a manner consistent with the Financial Action Task Force Recommendations ("FATF").

FATF Recommendations on Controlling Persons:

Identify the beneficial owners of the customer and take reasonable measures to verify the identity of such persons, through the following information. For legal persons¹⁷:

- (a) The identity of the natural persons (if any – as ownership interests can be so diversified that there are no natural persons (whether acting alone or together) exercising control of the legal person or arrangement through ownership) who ultimately have a controlling ownership interest¹⁸ in a legal person; and
- (b) to the extent that there is doubt under (a) as to whether the person(s) with the controlling ownership interest are the beneficial owner(s) or where no natural person exerts control through ownership interests, the identity of the natural persons (if any) exercising control of the legal person or arrangement through other means.
- (c) Where no natural person is identified under (a) or (b) above, financial institutions should identify and take reasonable measures to verify the identity of the relevant natural person who holds the position of senior managing official.

Entity means a legal person or a legal arrangement such as a trust.

Exempt Beneficial Owners under the US IGA include Government entities, International Organisations, Central Bank, Broad Participation Retirement Funds, Narrow Participation Retirement Funds, Pension Funds of an Exempt Beneficial Owner, and Investment Entities wholly owned by Exempt Beneficial Owners. Please refer to the IGA for detailed definitions.

Financial Institution means a Custodial Institution, a Depository Institution, an Investment Entity, or a Specified Insurance Company, where:

- (a) **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 percent 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;
- (b) **Depository Institution** means any entity that accepts deposits in the ordinary course of a banking or similar business;
- (c) **Investment Entity** means any entity that conducts as a business (or is managed by an entity that conducts as a business) one or more of the following activities or operations for or on behalf of a customer: (1) 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; (2) individual and collective portfolio management; or (3) otherwise investing, administering, or managing funds or money on behalf of other persons. The term Investment entity shall be interpreted in a manner consistent with similar language set forth in the definition of "financial institution" in the Financial Action Task Force Recommendations; and
- (d) **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.

NFFE means any Non-U.S. Entity that is not a Financial Institution as defined in US FATCA.

Non-U.S. Entity means an Entity that is not a U.S. Person.

Passive Non-Financial Foreign Entity means any NFFE that is not an Active Non-Financial Foreign Entity.

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 percent of the vote or value in an entity. Notwithstanding the foregoing, either Party may treat an entity as not a related entity if the two entities are not members of the same affiliated group, as defined in Section 1471(e)(2) of the Code.

Specified U.S. Person means a U.S. Person other than:

- (a) a corporation the stock of which is regularly traded on established securities markets;
- (b) any corporation that is a member of the same expanded affiliated group;
- (c) the United States or any wholly owned agency or instrumentality thereof;
- (d) any State of the United States, any U.S. Territory, any political subdivision or wholly owned agency or instrumentality of any one or more of the foregoing;
- (e) any organization exempt from taxation under section 501 (a) of the Internal Revenue Code (the "Code") or certain individual retirement plans defined in section 7701(a)(37) of the Code ;

¹⁷ Measures (a) to (b) are not alternative options, but are cascading measures, with each to be used where the previous measure has been applied and has not identified a beneficial owner.

¹⁸ A controlling ownership interest depends on the ownership structure of the company. It may be based on a threshold, e.g. any person owning more than a certain percentage of the company (e.g. 25%).

- (f) any bank as defined in section 581 of the Code;
- (g) any real estate investment trust as defined in section 856 of the Code;
- (h) any regulated investment company defined in section 851 of the Code or any entity registered with the U.S. Securities and Exchange Commission under the Investment Company Act of 1940;
- (i) any common trust fund as defined in section 584(a) of the Code;
- (j) any trust that is exempt from tax under section 664(c) of the Code or that is described in 4947(a)(1) of the Code;
- (k) a dealer in securities, commodities, or derivative financial instruments that is registered as such under the laws of the United States or any State;
- (l) a broker as defined in section 6045(c) of the Code; or
- (m) any tax-exempt trust under a plan that is described in section 403(b) or section 457(g) of the Code

U.S. Person means a U.S. citizen or resident individual, a partnership or corporation organized in the United States or under the laws of the United States or any State thereof, a trust if (i) a court within the United States would have authority under applicable law to render orders or judgments concerning substantially all issues regarding administration of the trust, and (ii) one or more U.S. persons have the authority to control all substantial decisions of the trust, or an estate of a decedent that is a citizen or resident of the United States. Refer to the U.S. Internal Revenue Code for further interpretation.

EXHIBIT B
UK IGA DEFINITIONS

Account Holder means the person listed or identified as the holder of a Financial Account by the Financial Institution that maintains the account. 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 adviser, or intermediary, is not treated as holding the account for the purposes of this Agreement, and such other person is treated as holding the account. In the case of a Cash Value Insurance Contract or an Annuity Contract, the Account Holder is any person entitled to access the Cash Value or change the beneficiary of the contract. If no person can access the Cash Value or change the beneficiary, the Account Holder is any person named as the owner in the contract and any person with a vested entitlement to payment under the terms of the contract. Upon the maturity of a Cash Value Insurance Contract or an Annuity Contract, each person entitled to receive a payment under the contract is treated as an Account Holder.

Active Non-Financial Foreign Entity means any NFFE that meets any of the following criteria:

- (a) Less than 50 percent of the NFFE's gross income for the preceding calendar year or other appropriate reporting period is passive income and less than 50 percent of the assets held by the NFFE 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 NFFE is regularly traded on an established securities market or the NFFE is a Related Entity of an entity the stock of which is traded on an established securities market;
- (c) The NFFE is a government, a political subdivision of such government or a public body performing a function of such government or a political subdivision thereof, or an entity wholly owned by one or more of the foregoing;
- (d) Substantially all of the activities of the NFFE 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 NFFE shall not qualify for this status if the NFFE 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 NFFE 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 NFFE shall not qualify for this exception after the date that is 24 months after the date of the initial organization of the NFFE;
- (f) The NFFE 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; or
- (g) The NFFE 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.

Code means the U.S Internal Revenue Code of 1986, as amended.

Controlling Person means the natural persons who exercise direct or indirect control over an entity. In the case of a trust, such term means the settlor, the trustees, the protector (if any), the beneficiaries or class of beneficiaries, and any other natural person exercising ultimate effective control over the trust, and in the case of a legal arrangement other than a trust, such term means persons in equivalent or similar positions. The term 'Controlling Persons' shall be interpreted in a manner consistent with the Financial Action Task Force Recommendations ("FATF").

FATF Recommendations on Controlling Persons:

Identify the beneficial owners of the customer and take reasonable measures to verify the identity of such persons, through the following information. For legal persons¹⁹:

- (a) The identity of the natural persons (if any – as ownership interests can be so diversified that there are no natural persons (whether acting alone or together) exercising control of the legal person or arrangement through ownership) who ultimately have a controlling ownership interest²⁰ in a legal person; and
- (b) to the extent that there is doubt under (a) as to whether the person(s) with the controlling ownership interest are the beneficial owner(s) or where no natural person exerts control through ownership interests, the identity of the natural persons (if any) exercising control of the legal person or arrangement through other means.
- (c) Where no natural person is identified under (a) or (b) above, financial institutions should identify and take reasonable measures to verify the identity of the relevant natural person who holds the position of senior managing official.

¹⁹ Measures (a) to (b) are not alternative options, but are cascading measures, with each to be used where the previous measure has been applied and has not identified a beneficial owner.

²⁰ A controlling ownership interest depends on the ownership structure of the company. It may be based on a threshold, e.g. any person owning more than a certain percentage of the company (e.g. 25%).

Exempt Beneficial Owners under the UK IGA include Government entities, International Organisations, Broad and Narrow Participation Retirement Funds, Pension Funds of an Exempt Beneficial Owner, Investment Entities wholly owned by Exempt Beneficial Owners, and Limited Capacity Exempt Beneficial Owners. Please refer to the IGA for detailed definitions.

Limited Capacity Exempt Beneficial Owners. The Controlling Persons of an NFFE that meets all of the following requirements shall be treated as an Exempt Beneficial Owner solely in their capacity as a Controlling Person of that NFFE:

- (a) 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 organization, civic league or an organisation operated exclusively for the promotion of social welfare;
- (b) It is exempt from income tax in its jurisdiction of residence;
- (c) It has no shareholders or members who have a proprietary or beneficial interest in its income or assets;
- (d) The applicable laws of the NFFE's jurisdiction of residence or the NFFE's formation documents do not permit any income or assets of the NFFE 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 NFFE's charitable activities, or as payment of reasonable compensation for services rendered, or as payment representing the fair market value of property which the NFFE has purchased; and
- (e) The applicable laws of the NFFE's jurisdiction of residence or the NFFE's formation documents require that, upon the NFFE'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 NFFE's jurisdiction of residence or any political subdivision thereof.

Financial Institution means a Custodial Institution, a Depository Institution, an Investment Entity, or a Specified Insurance Company, where:

- (e) *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 percent 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;
- (f) *Depository Institution* means any entity that accepts deposits in the ordinary course of a banking or similar business;
- (g) *Investment Entity* means any entity that conducts as a business (or is managed by an entity that conducts as a business) one or more of the following activities or operations for or on behalf of a customer: (1) 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; (2) individual and collective portfolio management; or (3) otherwise investing, administering, or managing funds or money on behalf of other persons. The term Investment entity shall be interpreted in a manner consistent with similar language set forth in the definition of "financial institution" in the Financial Action Task Force Recommendations; and
- (h) *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.

Non-Financial Foreign Entity or **NFFE** means any Non-United Kingdom Resident Entity that is not a Financial Institution as defined in UK FATCA.

Non-United Kingdom Resident Entity means an entity that is not resident in the United Kingdom for the purposes of UK FATCA.

Passive Non-Financial Foreign Entity means any NFFE that is not an Active Non-Financial Foreign Entity.

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 percent of the vote or value in an entity. Notwithstanding the foregoing, either Party may treat an entity as not a related entity if the two entities are not members of the same affiliated group, as defined in Section 1471(e)(2) of the Code.

Specified United Kingdom Person means a person who is resident in the United Kingdom for tax purposes, other than:

- (a) a corporation the stock of which is regularly traded on one or more established securities markets;
- (b) a corporation that is a member of the same affiliated group, as defined in Section 1471(e)(2) of the U.S. Internal Revenue Code, as a corporation described in (a) above;
- (c) a Depository Institution;
- (d) a broker or dealer in securities, commodities, or derivative financial instruments (including notional principle contracts, futures, forwards, and options) that is registered as such under the laws of the United Kingdom; or
- (e) a Non-Reportable United Kingdom Entity as defined in Annex II paragraph V of UK FATCA (referring to certain UK governmental organizations, international organizations, central bank and UK retirement funds).

U.K. Tax Resident means a resident in the United Kingdom for tax purposes (including where a person or entity is resident in United Kingdom and in any other jurisdiction under the respective domestic laws of the United Kingdom and such other jurisdiction).

EXHIBIT C
CRS DEFINITIONS

Account Holder means the person listed or identified as the holder of a Financial Account by the Financial Institution that maintains the account. 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 for purposes of the Common Reporting Standard, and such other person is treated as holding the account. In the case of a Cash Value Insurance Contract or an Annuity Contract, the Account Holder is any person entitled to access the Cash Value or change the beneficiary of the contract. If no person can access the Cash Value or change the beneficiary, the Account Holder is any person named as the owner in the contract and any person with a vested entitlement to payment under the terms of the contract. Upon the maturity of a Cash Value Insurance Contract or an Annuity Contract, each person entitled to receive a payment under the contract is treated as an Account Holder.

Active Non-Financial Entity means any NFE that 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, 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:
 - 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 thereof.

Controlling Person means the natural persons who exercise direct or indirect control over an entity. In the case of a trust, such term means the settlor(s), the trustees(s), the protector(s) (if any), the beneficiary(ies) or class(es) of beneficiaries, and any other natural person(s) exercising ultimate effective control over the trust, and in the case of a legal arrangement other than a trust, such term means persons in equivalent or similar positions. The term 'Controlling Persons' shall be interpreted in a manner consistent with the Financial Action Task Force Recommendations ("FATF").

FATF Recommendations on Controlling Persons:

Identify the beneficial owners of the customer and take reasonable measures to verify the identity of such persons, through the following information. For legal persons²¹:

- (a) The identity of the natural persons (if any – as ownership interests can be so diversified that there are no natural persons (whether acting alone or together) exercising control of the legal person or arrangement through ownership) who ultimately have a controlling ownership interest²² in a legal person; and
- (b) to the extent that there is doubt under (a) as to whether the person(s) with the controlling ownership interest are the beneficial owner(s) or where no natural person exerts control through ownership interests, the identity of the natural persons (if any) exercising control of the legal person or arrangement through other means.
- (c) Where no natural person is identified under (a) or (b) above, financial institutions should identify and take reasonable measures to verify the identity of the relevant natural person who holds the position of senior managing official.

Financial Institution means a Custodial Institution, a Depository Institution, an Investment Entity, or a Specified Insurance Company, where:

- (a) **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 percent 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;
- (b) **Depository Institution** means any entity that accepts deposits in the ordinary course of a banking or similar business;
- (c) **Investment Entity** means any entity :
 - (A) that primarily conducts as a business 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; 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; or
 - (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 described in limb (A) of this definition.

An entity is treated as primarily conducting as a business one or more of the activities described in limb (A), or an entity's gross income is primarily attributable to investing, reinvesting, or trading in Financial Assets for purposes of limb (B) if the entity's gross income attributable to the relevant activities equals or exceeds 50% of the entity's gross income during the shorter of: (i) the three-year period ending on 31 December of the year preceding the year in which the determination is made; or (ii) the period during which the entity has been in existence. The term "Investment Entity" does not include an entity that is an Active Non-Financial Foreign Entity because it meets any of the criteria in subparagraphs d) through (g) of the definition of Active NFE.

The preceding paragraph shall be interpreted in a manner consistent with similar language set forth in the definition of "financial institution" in the Financial Action Task Force Recommendations; and

- (d) **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.

Non-Financial Entity or **NFE** means any Entity that is not a Financial Institution.

Non-Participating Jurisdiction means a jurisdiction that is not a Participating Jurisdiction.

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

- (a) 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;
- (b) 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;
- (c) any other Entity that presents a low risk of being used to evade tax, has substantially similar characteristics to any of the Entities described in subparagraphs B(1)(a) and (b), and is defined in domestic law as a Non-Reporting Financial Institution, provided that the status of such Entity as a Non-Reporting Financial Institution does not frustrate the purposes of the Common Reporting Standard;
- (d) an Exempt Collective Investment Vehicle; or

²¹ Measures (a) to (b) are not alternative options, but are cascading measures, with each to be used where the previous measure has been applied and has not identified a beneficial owner.

²² A controlling ownership interest depends on the ownership structure of the company. It may be based on a threshold, e.g. any person owning more than a certain percentage of the company (e.g. 25%).

- (e) a trust to the extent that the trustee of the trust is a Reporting Financial Institution and reports all information required to be reported pursuant to Section I with respect to all Reportable Accounts of the trust.

Participating Jurisdiction means a jurisdiction (i) with which an agreement is in place pursuant to which it will provide the information specified in Section I (of the CRS), and (ii) which is identified in a published list.

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

Passive Non-Financial Entity means any: (i) Non-Financial Entity that is not an Active Non-Financial Entity; or (ii) an Investment Entity described in limb B (or subparagraph A(6)(b) of the Standard) of the definition of Investment Entity that is not a Participating Jurisdiction Financial Institution.

Related Entity means an entity related to another entity because (i) either entity controls the other entity; (ii) the two entities are under common control; or (iii) the two entities are Investment Entities described limb B of the definition of Investment Entity, are under common management, and such management fulfils the due diligence obligations of such Investment Entities. For this purpose control includes direct or indirect ownership of more than 50 % of the vote and value in an Entity.

Individual Self-Certification**Instructions for completion**

We are obliged under the Tax Information Authority Law, the Regulations, and Guidance Notes made pursuant to that Law, and treaties and intergovernmental agreements entered into by the Cayman Islands 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 the sections below as directed 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 Cayman Islands Regulations, Guidance Notes or international 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 accompanying guidelines for completion or contact your tax advisor.

Please note that where there are joint account holders each investor is required to complete a separate Self-Certification form.

Section 1: Account Holder Identification

Account Holder Name	Date of Birth (dd/mm/yyyy)	Place and Country of Birth
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Permanent Residence 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

Section 2: Declaration of U.S. Citizenship or U.S. Residence for Tax purposes

Please tick either (a) or (b) or (c) and complete as appropriate.

- (c) ☐ I confirm that I am a U.S. citizen and/or resident in the U.S. for tax purposes (green card holder or resident under the substantial presence test) and my U.S. federal taxpayer identifying number (U.S. TIN) is as follows:
- (d) ☐ I confirm that I was born in the U.S. (or a U.S. territory) but am no longer a U.S. citizen as I have voluntarily surrendered my citizenship as evidenced by the attached documents.
- (e) ☐ I confirm that I am not a U.S. citizen or resident in the U.S. for tax purposes.

Complete section 3 if you have non-U.S. tax residences.

Section 3: Declaration of Tax Residency (other than U.S.)

I hereby confirm that I am, for tax purposes, resident in the following countries (indicate the tax reference number type and number applicable in each country).

Country/countries of tax residency	Tax reference number type	Tax reference number

Please indicate not applicable if jurisdiction does not issue or you are unable to procure a tax reference number or functional equivalent. If applicable, please specify the reason for non-availability of a tax reference number:

Section 4: Declaration and Undertakings

I declare 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.

Signature: _____

Date: (dd/mm/yyyy): _____