

Renaissance Capital

RENAISSANCE SECURITIES (CYPRUS) LIMITED

CUSTOMER DOCUMENT PACK: ACCOUNT OPENING PACK (FATCA/CRS QUESTIONNAIRE – LEGAL ENTITY)

FOR PROFESSIONAL CLIENTS AND ELIGIBLE COUNTERPARTIES

CUSTOMER WARNING

RENAISSANCE SECURITIES (CYPRUS) LIMITED DOES NOT OFFER SERVICES OR CARRY OUT ANY BUSINESS WITH CUSTOMERS CATEGORISED AS RETAIL CLIENTS. YOU CAN ONLY FILL IN, SIGN AND DELIVER THIS QUESTIONNAIRE, IF YOU ARE CLASSIFIED AS A PROFESSIONAL CLIENT OR AN ELIGIBLE COUNTERPARTY. WHERE YOU ARE CLASSIFIED AS A PROFESSIONAL CLIENT OR AN ELIGIBLE COUNTERPARTY YOU SHALL NOT BENEFIT FROM CERTAIN INVESTOR PROTECTIONS WHICH ARE AVAILABLE TO RETAIL CLIENTS UNDER THE APPLICABLE LAWS AND REGULATIONS. WE ARE ENTITLED TO ASSUME THAT AS A PROFESSIONAL CLIENT YOU HAVE THE NECESSARY EXPERIENCE AND KNOWLEDGE TO UNDERSTAND THE RELEVANT RISKS INVOLVED IN THE PRODUCTS OR INVESTMENT SERVICES OFFERED OR DEMANDED UNDER THE INVESTMENT SERVICES AGREEMENT ENTERED OR TO BE ENTERED INTO BETWEEN YOU AND RENAISSANCE SECURITIES (CYPRUS) LIMITED AND, THEREFORE, OUR OBLIGATION TO ASSESS THE APPROPRIATENESS THEREOF SHALL BE DEEMED FULFILLED. WE ARE UNDER NO OBLIGATION TO ASSESS THE APPROPRIATENESS OF SERVICES AND FINANCIAL INSTRUMENTS OFFERED TO OR DEMANDED BY ELIGIBLE COUNTERPARTIES. WE DO NOT OFFER INVESTMENT ADVICE.

Dear Customer,

Please fill in the below FATCA/CRS Questionnaire (“**Questionnaire**”), sign and return it to ClientManagement@rencap.com.

This Questionnaire constitutes an integral part of the Account Opening Pack. Should any of the details specified below change, please notify us immediately and arrange for the new FATCA/CRS Questionnaire to be provided to us as soon as possible. Unless otherwise defined in Appendix, any capitalised terms used herein shall have the meaning ascribed to them in the Investment Services Agreement entered or about to be entered into between you and Renaissance Securities (Cyprus) Limited (“**Renaissance**”).

INSTRUCTIONS

Please read these instructions before completing the Questionnaire.

CRS and FATCA require Renaissance to collect and report certain information about an Account Holder’s tax residence.

If the Account Holder’s tax is located outside **the Republic of Cyprus**, we may be legally obliged to pass on the information in this Questionnaire and other financial information with respect to your financial accounts (i) **to the Cypriot Tax Department** and they may exchange this information with tax authorities of another jurisdiction or jurisdictions pursuant to intergovernmental agreements to exchange financial account information, and/or (ii) **to the U.S. tax authorities**.

This Questionnaire will remain valid unless there is a change in your circumstances, such as a change of the Account Holder’s tax status. In that case you must promptly notify us and provide an updated Questionnaire.

If the Account Holder is a U.S. citizen or tax resident under U.S. law, you should indicate that you are a U.S. tax resident on this Questionnaire and you may also need to fill in and provide to Renaissance an IRS W-9 form.

We do not give tax advice. For more information, please consult your tax adviser or the OECD automatic exchange of information portal at <https://www.oecd.org/tax/automatic-exchange/>. Your domestic tax authority can provide guidance on how to determine your tax status.

Where the Account Holder is a Passive NFE, or an Investment Entity located in a Non-Participating Jurisdiction managed by another Financial Institution, please provide information on the individual(s) who exercise control over the Account Holder (individuals referred to as “Controlling Person(s)”) by completing a “Controlling Person Tax Residency Self-Certification Questionnaire” for each Controlling Person.

You should indicate the capacity in which you have signed this Questionnaire. For example, you may be a custodian or nominee of an Account, or you are signing this Questionnaire under a signatory authority or a power of attorney.

GENERAL INFORMATION ABOUT ACCOUNT HOLDER

1 Entity full name

2 Actual address

House/Apt/Suite

Building

Street

City/Town

State/Province

Country Postal Code

3 Mailing address (please only complete if different from the address in point 2)

House/Apt/Suite

Building

Street

City/Town

State/Province

Country Postal Code

4 Tax residence

Jurisdiction of tax residence*	TIN (equivalent)**	Reason for TIN absence – please reference A, B or C as explained below
1		
2		
3		

If there is no TIN, please indicate one of the following reasons in the "Reason for TIN absence" field:

- A** - The Jurisdiction of tax residence does not assign TIN
- B** - The Account Holder is otherwise unable to obtain a TIN or equivalent number
- C** - No TIN is required (*Note: only select this reason if the domestic law of the relevant jurisdiction does not require the collection of the TIN issued by such jurisdiction*)

If you have referenced Reason B above, please specify for each case why you are unable to obtain TIN.

*** If the U.S. is indicated, please provide form W-9.**

**** If you have several tax identification numbers, please indicate all of them.**

5 If the country of actual residence does not correspond to the country of tax residence, provide an explanation/confirmation of this discrepancy

6 Is the entity a Financial Institution for CRS purposes?

- Yes** Please specify the type of Financial Institution:
- the entity is an Investment Entity located in a Non-Participating Jurisdiction and managed by another Financial Institution

If in this you have specified "Yes", the entity will be considered as a passive non-financial entity and therefore it is necessary to:

a) **indicate the name** of each Controlling Person of the Account Holder

b) **complete** Annex 2 "Controlling Person Tax Residency Self-Certification Questionnaire" for each Controlling Person

the entity is a Depository Institution, Custodial Institution or Specified Insurance Company

the entity is Other Investment Entity

No If the answer in this question is "No", please complete Annex 1

7 Is the entity a Financial institution for FATCA purposes?

Yes Please provide the completed W8 form

IRS registration status

GIIN *

* If GIIN has been applied for but not obtained yet, please specify "applied for".

No

8 If the entity is not a Financial institution for FATCA purposes, please indicate FATCA status of the entity

The entity customer is an Active Non-financial Foreign Entity

The entity customer is a Passive Non-financial Foreign Entity

If this status is specified, it is necessary to:

a) **indicate the name** of each Controlling Person of the Account Holder that is a Specified U.S. Person (if any):

b) **complete** Annex 2 "Controlling Person Tax Residency Self-Certification Questionnaire" for each Controlling Person that is a Specified U.S. Person

Other

Please provide the completed **W8 form**

DECLARATIONS AND SIGNATURE

We understand that the Customer Document Pack, including the Investment Services Agreement, governs our relationship with Renaissance and specifies how Renaissance may use and share the information supplied by us.

We acknowledge that Renaissance may disclose and transfer any information supplied by us to Renaissance’s parent companies, branches, subsidiaries, affiliates, representative offices, or third party service providers located anywhere in the world (in or outside the country or jurisdiction in which we reside, in which our relationship with Renaissance is maintained, or in which the transaction in relation to the Account Holder and/or any Reportable Account(s) is undertaken) when considered necessary by you for your business purposes or in connection with, to comply with, or to facilitate compliance with, any law, regulation, court order or requirement (including under any code, guideline, standard, policy, circular or notice) of a governmental, regulatory, supervisory, law enforcement, prosecuting, tax or similar authority or industry body in any jurisdiction existing currently or in the future, or for the purposes of ongoing cooperation with such governmental, regulatory and/or statutory authority, or to comply with any agreement or arrangement with such authority or between such authorities in any jurisdiction existing currently or in the future. We consent, instruct and authorise Renaissance to make such disclosures and transfers. We expressly waive any protection or right under data protection, confidentiality, or any other applicable law, to the extent necessary for such disclosures and transfers.

We acknowledge that the information contained in this Questionnaire and information regarding the Account Holder and any Reportable Account(s) may be provided to the tax authorities of the country/jurisdiction in which the Reportable Account(s) is/are maintained and exchanged with tax authorities of another country/jurisdiction or countries/jurisdictions in which the Account Holder may be tax resident pursuant to intergovernmental agreements to exchange financial account information or other legal requirements.

We certify that we are the Account Holder(s) (or I am/We are authorised to sign for and on behalf of the Account Holder) of all the Account(s) to which this Questionnaire relates.

We declare that all statements made in this declaration are correct and complete.

We undertake to advise Renaissance within 30 calendar days of any change in circumstances which affects the tax residency status of the Account Holder identified in this Questionnaire or causes the information contained herein to become incorrect or incomplete, and to provide Renaissance with a suitably updated self-certification and declaration within 30 calendar days of such change in circumstances.

Signature _____

Print name _____

Date _____

Note: If you are not the Account Holder, please indicate the capacity in which you are signing the Questionnaire. If signing under a power of attorney, please also attach a certified copy of the power of attorney.

Capacity _____

Annex 1

Self-certification form for the purposes of CRS with respect to entities other than Financial Institutions

Please indicate the status of the entity for the purposes of CRS.

- The entity is an active non-financial entity.

Please provide the criterion:

- less than 50% of the entity'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 entity during the preceding calendar year or other appropriate reporting period are assets that produce or are held for the production of passive income
- the stock of the entity is regularly traded on an established securities market.

Please specify the exchange:

- the entity is a related entity or that directly or indirectly controls such entity, is traded on established securities market.

Please specify the entity the stock of which is regularly traded on an established securities market:

Please specify the exchange:

- the entity is a Government Entity, an International Organisation, a Central Bank, or an Entity wholly owned by one or more of the foregoing.
- substantially all of the activities of the entity consist of holding (in whole or in part) the outstanding stock of, or providing financing and services to, one or more subsidiaries that engage in trades or businesses other than the business of a Financial Institution (except that an entity does not qualify for this status if the entity functions (or holds itself out) as an investment fund, such as a private equity fund, venture capital fund, leveraged buyout fund, or any investment vehicle whose purpose is to acquire or fund companies and then hold interests in those companies as capital assets for investment purposes).
- the entity is not yet operating a business and has no prior operating history (a "start-up NFE") but is investing capital into assets with the intent to operate a business other than that of a Financial Institution.
- the entity was not a Financial Institution in the past five years, and is in the process of liquidating its assets or is reorganising with the intent to continue or recommence operations in a business other than that of a Financial Institution.
- the entity 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.

- the entity is a non-profit organisation, whose income is not subject to taxation or is exempt from taxes.

- The entity confirms it is a passive non-financial entity.

If this status is specified, it is necessary to:

- a) **indicate the name** of each Controlling Person of the Account Holder:

- b) **complete Annex 2** "Controlling Person tax residency self-certification form" for each Controlling Person.

Annex 2

Controlling Person tax residency self-certification form

GENERAL INFORMATION ABOUT CONTROLLING PERSON

1 Title

Family Name or Surname

First or Given Name

Middle Name(s)

2 Date of birth / /

(DD/MM/YYYY)

3 Place of birth
Town or City

Country

4 Current residence address
House/Apt/Suite

Building

Street

City/Town

State/Province

Country ZIP/Post code

5 Mailing address (please only complete if different from the address in point 4)
House/Apt/Suite

Building

Street

City/Town

State/Province

Country ZIP/Post code

6 **Tax residence***: please indicate the country where you are tax resident at the time of completion of this questionnaire

Jurisdiction of tax residence**	TIN (equivalent)	Reason for TIN absence - please reference A, B or C as explained below
1		
2		
3		

If there is no TIN, please indicate one of the following reasons in the "Reason for TIN absence" field:

- A** - The Jurisdiction of tax residence does not assign TIN
- B** - The Account Holder is otherwise unable to obtain a TIN or equivalent number
- C** - No TIN is required (*Note: only select this reason if the domestic law of the relevant jurisdiction does not require the collection of the TIN issued by such jurisdiction*)

If you have referenced Reason **B** above, please specify for each case why you are unable to obtain a TIN.

** If there are several jurisdictions of tax residence, please specify all of them.*

*** If the U.S. is indicated, please provide form W-9.*

7 Is your country of tax residency on the list of countries providing “citizenship/residency by investment” program¹ (“CBI/RBI program”)?

Yes Provide answers to the following questions:

1. Do you hold residence rights in any other jurisdiction(s)

Yes

Specify country:

No

2. Have you spent more than 90 days during the previous year in a country other than the country providing CBI/RBI program?

Yes

Specify country:

No

3. Have you filed personal income tax returns during the previous year in any jurisdiction other than the jurisdiction on the list of CBI/RBI program?

Yes

Specify country:

No

No

¹ The list of countries providing “citizenship/residency by investment” program includes: United Arab Emirates, Antigua and Barbuda, Bahamas, Barbados, Bahrain, Cyprus, Dominica, Grenada, Montenegro, Malta, Saint Kitts and Nevis, Saint Lucia, Panama, Seychelles, Turks and Caicos Islands, Vanuatu (for more information please follow the link <https://www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/residence-citizenship-by-investment/>)

8 Type of control

Please indicate the type of controlling person in the table below.

Controlling Person of a legal person – control by ownership	<input type="checkbox"/>
Controlling Person of a legal person – control by other means	<input type="checkbox"/>
Controlling Person of a legal person – senior managing official	<input type="checkbox"/>
Controlling Person of a trust – settlor	<input type="checkbox"/>
Controlling Person of a trust – trustee	<input type="checkbox"/>
Controlling Person of a trust – protector	<input type="checkbox"/>
Controlling Person of a trust – beneficiary	<input type="checkbox"/>
Controlling Person of a trust – other	<input type="checkbox"/>
Controlling Person of a legal arrangement (non-trust) – settlor-equivalent	<input type="checkbox"/>
Controlling Person of a legal arrangement (non-trust) – trustee-equivalent	<input type="checkbox"/>
Controlling Person of a legal arrangement (non-trust) – protector-equivalent	<input type="checkbox"/>
Controlling Person of a legal arrangement (non-trust) – beneficiary-equivalent	<input type="checkbox"/>
Controlling Person of a legal arrangement (non-trust) – other-equivalent	<input type="checkbox"/>

Appendix

Glossary

Note: These are selected summaries of defined terms provided to assist you with the completion of this Questionnaire.

The terms referring to FATCA is defined in accordance with the U.S. Internal Revenue Code.

The terms referring to CRS is defined in accordance with the OECD's Common Reporting Standard.

The terms without a reference to particular regulation have the same meaning in both FATCA and CRS.

Capitalised terms not defined in this Appendix, shall have the meaning ascribed to them in CRS or applicable intergovernmental agreement.

Further details can be found within the CRS, the associated Commentary to the CRS, intergovernmental agreements and domestic guidance.

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

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 CRS, 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. Where 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 NFE (CRS)	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,

	<p>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;</p> <p>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;</p> <p>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;</p> <p>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</p> <p>h) The NFE meets all of the following requirements:</p> <ul style="list-style-type: none"> (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 sub-division thereof.
<p>Active Non-Financial Foreign Entity or Active NFFE (FATCA)</p>	<p>means any NFFE that meets any of the following criteria:</p> <p>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</p>

	<p>or other appropriate reporting period are assets that produce or are held for the production of passive income;</p> <p>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 regularly traded on an established securities market;</p> <p>c) The NFFE is organised in a U.S. Territory and all of the owners of the payee are bona fide residents of that U.S. Territory;</p> <p>d) The NFFE is a government (other than the U.S. government), a political subdivision of such government (which, for the avoidance of doubt, includes a state, province, county, or municipality), or a public body performing a function of such government or a political subdivision thereof, a government of a U.S. Territory, an international organisation, a non-U.S. central bank of issue, or an Entity wholly owned by one or more of the foregoing;</p> <p>e) 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 entity shall not qualify for NFFE 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;</p> <p>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 organisation of the NFFE;</p> <p>g) The NFFE 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;</p> <p>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;</p> <p>i) The NFFE is an “excepted NFFE” as described in relevant U.S. Treasury Regulations; or</p> <p>j) The NFFE meets all of the following requirements:</p> <p>(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, labor organisation, agricultural or horticultural</p>
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	<p>organisation, civic league or an organisation operated exclusively for the promotion of social welfare;</p> <p>(ii) It is exempt from income tax in its jurisdiction of residence;</p> <p>(iii) It has no shareholders or members who have a proprietary or beneficial interest in its income or assets;</p> <p>(iv) 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</p> <p>(v) 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.</p>
Control (CRS)	<p>means control over an Entity is generally exercised by the natural person(s) who ultimately has a controlling ownership interest in the Entity. A “control ownership interest” depends on the ownership structure of the legal person and is usually identified on the basis of a threshold applying a risk-based approach (example, any person owning more than a certain percentage of the legal person, such as 25%). Where no natural person(s) exercises control through ownership interests, the Controlling Person of the Entity will be the natural person who exercises control of the Entity through other means. Where no natural person is identified as exercising control of the Entity, the Controlling Person of the Entity will be the natural person who holds the position of senior managing official.</p>
Controlling Person(s)	<p>means the natural persons who exercise control over an Entity. In the case of a trust, such term means the settlor, the trustee, the protector (if any), the beneficiary 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.</p>
Custodial Institution	<p>means any Entity that holds, as a substantial portion of its business, Financial Assets for the account of others. An Entity holds Financial Assets for the account of others as a substantial portion of its business if the Entity’s gross income attributable to the holding of Financial Assets and related financial services equals or exceeds 20% of the Entity’s gross income during the shorter of:</p> <p>(i) the three-year period that ends on 31st December (or the final day of a non-calendar year accounting period) prior to the year in which the determination is being made; or</p> <p>(ii) the period during which the Entity has been in existence.</p>

Depository Institution	means any Entity that accepts deposits in the ordinary course of a banking or similar business.
Entity	means a legal person or a legal arrangement, such as a corporation, partnership, trust, or foundation.
FATCA	means the Foreign Account Tax Compliance provisions, which were enacted into U.S. law as part of the Hiring Incentives to Restore Employment (HIRE) Act on March 18, 2010. FATCA creates a new information reporting and withholding regime for payments made to certain non-U.S. financial institutions and other non-U.S. entities.
Financial Institution	means a Custodial Institution, a Depository Institution, an Investment Entity, or a Specified Insurance Company.
International Organisation (CRS)	<p>means any international organisation or wholly owned agency or instrumentality thereof. This category includes any inter-governmental organisation (including a supranational organisation):</p> <ul style="list-style-type: none"> (i) that is comprised primarily of governments; (ii) that has in effect a headquarters or substantially similar agreement with the jurisdiction; and (iii) the income of which does not inure to the benefit of private persons.
Investment Entity (CRS)	<p>means any Entity:</p> <ul style="list-style-type: none"> a) that primarily conducts as a business one or more of the following activities or operations for or on behalf of a customer: <ul style="list-style-type: none"> (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, where 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 sub-paragraph A(6)(a). <p>An Entity is treated as primarily conducting as a business one or more of the activities described in sub-paragraph A(6)(a), or an Entity's gross income is primarily attributable to investing, reinvesting, or trading in Financial Assets for purposes of sub-paragraph A(6)(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:</p> <ul style="list-style-type: none"> (i) the three-year period ending on 31st 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. <p>"Investment Entity" does not include an Entity that is an Active NFE because it meets any of the criteria in sub-paragraphs D(9)(d) to (g).</p>

	This 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.
Investment Entity located in a Non-Participating Jurisdiction and managed by another Financial Institution (CRS)	means any Entity the gross income of which is primarily attributable to investing, reinvesting, or trading in Financial Assets if the Entity is (i) managed by a Financial Institution and (ii) not a Participating Jurisdiction Financial Institution.
NFE (CRS)	means any Entity that is not a Financial Institution.
Non-Reporting Financial Institution (CRS)	means any Financial Institution that is: <ul style="list-style-type: none"> 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) an Exempt Collective Investment Vehicle; d) a Trustee-Documented Trust: a trust where the trustee of the trust is a Reporting Financial Institution and reports all information required to be reported with respect to all Reportable Accounts of the trust; or e) any other defined in a countries domestic law as a Non-Reporting Financial Institution.
Participating Jurisdiction (CRS)	means a jurisdiction: <ul style="list-style-type: none"> (i) with which an agreement is in place pursuant to which it will provide the information specified in Section I; and (ii) which is identified in a published list.
Passive Income (FATCA)	means: <ol style="list-style-type: none"> 1. Dividends, including income replacing dividends; 2. Interest, including income equivalent to interest income or derived from a combination of insurance contracts, if such income depends on changes in such contracts; 3. Rent and royalties (except for income derived from the active involvement of company employees); 4. Annuity income; 5. Profit from the sale or exchange of assets generating the above types of passive income; 6. Profit from operations with goods, including operations with futures, forwards and other similar transactions;

	<p>7. Profit from operations with foreign currency;</p> <p>8. Net income from operations with non-deliverable swaps (notional principal contracts);</p> <p>9. Amounts received under life insurance contracts with cash value;</p> <p>10. Amounts received by the insurance company in connection with the investment of reserves under insurance and annuity contracts.</p> <p>Exceptions (income is not included in the definition of passive income):</p> <p>1. Any income from interest, dividends, rents, or royalties that is received or accrued from a related person to the extent such amount is properly allocable to income of such related person that is not passive income;</p> <p>2. The company revenues, if the company regularly acts as a dealer in relation to operations with assets generating passive income, or with forwards, options and other financial instruments.</p>
Passive NFE (CRS)	<p>means any:</p> <p>(i) NFE that is not an Active NFE; or</p> <p>(ii) an Investment Entity described in sub-paragraph A(6)(b) that is not a Participating Jurisdiction Financial Institution.</p>
Passive Non-financial Foreign Entity or Passive NFFE (FATCA)	<p>means any NFFE that is not (i) an Active NFFE, or (ii) a withholding foreign partnership or withholding foreign trust pursuant to relevant U.S. Treasury Regulations.</p>
Reportable Account (CRS)	<p>means an account held by one or more Reportable Persons or by a Passive NFE with one or more Controlling Persons that is a Reportable Person, provided it has been identified as such, pursuant to the due diligence procedures.</p>
U.S. Reportable Account (FATCA)	<p>means a U.S. Reportable Account or a Cyprus Reportable Account.</p> <p>The term “U.S. Reportable Account” means a Financial Account maintained by a Reporting Cyprus Financial Institution and held by one or more Specified U.S. Persons or by a Non-U.S. Entity with one or more Controlling Persons that is a Specified U.S. Person.</p> <p>The term “Cyprus Reportable Account” means a Financial Account maintained by a Reporting U.S. Financial Institution if:</p> <p>(i) in the case of a Depository Account, the account is held by an individual resident in Cyprus and more than \$10 of interest is paid to such account in any given calendar year; or</p> <p>(ii) in the case of a Financial Account other than a Depository Account, the Account Holder is a resident of Cyprus, including an Entity that certifies that it is resident in Cyprus for tax purposes, with respect to which U.S. source income that is subject to reporting under chapter 3 of subtitle A or chapter 61 of subtitle F of the U.S. Internal Revenue Code is paid or credited.</p>
Reportable Jurisdiction (CRS)	<p>means a jurisdiction:</p> <p>(i) with which an agreement is in place pursuant to which there is an obligation in place to provide the information specified in Section I, and</p>

	(ii) which is identified in a published list.
Reportable Jurisdiction Person (CRS)	means an individual or Entity that is resident in a Reportable Jurisdiction under the tax laws of such jurisdiction, or an estate of a decedent that was a resident of a Reportable Jurisdiction. For this purpose, an Entity such as a partnership, limited liability partnership or similar legal arrangement that has no residence for tax purposes shall be treated as resident in the jurisdiction in which its place of effective management is situated.
Reportable Person (CRS)	means a Reportable Jurisdiction Person other than: <ul style="list-style-type: none"> (i) a corporation the stock of which is regularly traded on one or more established securities markets; (ii) any corporation that is a Related Entity of a corporation described in subparagraph(i); (iii) a Governmental Entity; (iv) an International Organisation; (v) a Central Bank; or (vi) a Financial Institution.
Resident for tax purposes (CRS)	Generally, an Entity will be resident for tax purposes in a jurisdiction if, under the laws of that jurisdiction (including tax conventions), it pays or should be paying tax therein by reason of domicile, residence, place of management or incorporation, or any other criterion of a similar nature, and not only from sources in that jurisdiction. Dual resident Entities may rely on the tiebreaker rules contained in tax conventions (if applicable) to solve cases of double residence for determining their residence for tax purposes. An Entity such as a partnership, limited liability partnership or similar legal arrangement that has no residence for tax purposes shall be treated as resident in the jurisdiction in which its place of effective management is situated. A trust is treated as resident where one or more of its trustees is resident. For additional information on tax residence, please talk to your tax adviser or see the following link: http://www.oecd.org/tax/transparency/automaticexchangeofinformation.htm
Specified Insurance Company (CRS)	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.
Specified U.S. person	means a U.S. Person, other than: <ul style="list-style-type: none"> (i) a corporation the stock of which is regularly traded on one or more established securities markets; (ii) any corporation that is a member of the same expanded affiliated group, as defined in section 1471(e)(2) of the U.S. Internal Revenue Code, as a corporation described in clause (i); (iii) the United States or any wholly owned agency or instrumentality thereof;

	<p>(iv) any State of the United States, any U.S. Territory, any political subdivision of any of the foregoing, or any wholly owned agency or instrumentality of any one or more of the foregoing;</p> <p>(v) any organisation exempt from taxation under section 501(a) of the U.S. Internal Revenue Code or an individual retirement plan as defined in section 7701(a)(37) of the U.S. Internal Revenue Code;</p> <p>(vi) any bank as defined in section 581 of the U.S. Internal Revenue Code;</p> <p>(vii) any real estate investment trust as defined in section 856 of the U.S. Internal Revenue Code;</p> <p>(viii) any regulated investment company as defined in section 851 of the U.S. Internal Revenue Code or any entity registered with the U.S. Securities and Exchange Commission under the Investment Company Act of 1940 (15 U.S.C. 80a-64);</p> <p>(ix) any common trust fund as defined in section 584(a) of the U.S. Internal Revenue Code;</p> <p>(x) any trust that is exempt from tax under section 664(c) of the U.S. Internal Revenue Code or that is described in section 4947(a)(1) of the U.S. Internal Revenue Code;</p> <p>(xi) 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;</p> <p>(xii) a broker as defined in section 6045(c) of the U.S. Internal Revenue Code; or (xiii) any tax-exempt trust under a plan that is described in section 403(b) or section 457(g) of the U.S. Internal Revenue Code.</p>
TIN	means Taxpayer Identification Number (or functional equivalent in the absence of a Taxpayer Identification Number).
U.S. Person	means a U.S. citizen or resident individual, a partnership or corporation organised 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. This subparagraph 1(ee) shall be interpreted in accordance with the U.S. Internal Revenue Code.