Sagicor

Entity Self-Certification

Instructions for completion

We are obliged under the inter-governmental agreement ("IGA") and any and all enactments supporting the implementation of the IGA to improve tax compliance and to implement the Foreign Account Tax Compliance Act ("FATCA") entered into by the government of the United States of America and the respective government of Jamaica in relation to the automatic exchange of information for tax matters. Regulations based on the OECD Common Reporting Standard ("CRS")"] require Financial Institutions to collect and report certain information about an account holder's tax residence. If the Account Holder or any of its Controlling Persons have a tax residence outside the country where the account is held or is a U.S. Person, we may need to report this information, along with information relating to your account, with the relevant tax authorities.

As a result, we are also obligated to collect certain information about each Account Holder Entity's tax arrangements, including personal information of natural persons connected to that Entity.

Please complete the sections below as directed and provide any additional information that is requested. Please note that in certain circumstances 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 IGA, CRS regulations and/or guidance notes. We have provided a summary of the definitions of the FATCA and Common Reporting Standard (CRS) Entity classifications in the Appendix, but these are not exhaustive and so no substitute for the legal definitions.

If any of the information below about your tax residence or FATCA 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 contact your tax advisor.

PART I: General

Section 1: Account Holder Identification

Legal Name of Entity/Branch **Country of Incorporation/Organisation**

Current Residence or Registered Address:

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

Mailing address (if different from above):

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

Section 2: Declaration of All Tax Residence

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

Jurisdiction(s) of Tax Residence	Tax reference number type	Tax reference number (e.g. TIN)	If no Tax Reference number (e.g. TIN) is available enter Reason A, B or C

If applicable, please specify the reason for non-availability of a tax reference number (e.g. TIN):

Reason A – The country/jurisdiction where the Account Holder is resident does not issue TINs to its residents.

Reason B- The Account Holder is otherwise unable to obtain a TIN or equivalent number. Please explain why you are unable to obtain a TIN if you have selected this reason.

Reason 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)

PART II: US FATCA

Please complete either section 3 or 4

Section 3: U.S. Entities

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 exemption (refer to definitions section in Exhibit A[1]

_____

OR If the Entity is neither a Specified US Person or a U.S. person, please complete Section 3 below.

Section 4: US FATCA Classification for all Non-United States Entities

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

4.1 If the Entity is a ***Registered Financial Institution*****,** please tick one of the categories below, and provide the Entity's *Global Intermediary Identification Number (GIIN)at 4.1.1*.

(a) ☐ **Jamaican** or IGA Partner Jurisdiction Financial Institution
(b) ☐ Registered Deemed Compliant Foreign Financial Institution
(c) ☐ Participating Foreign Financial Institution

4.1.1 Please provide the Entity's *GIIN:*_____

(if registration in progress indicate so)

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

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

4.3 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] Please indicate exemption here (refer to definitions section in Exhibit)

_____

(b) ☐ The Entity is an ***Active Non-Financial Foreign Entity (NFFE)***[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: _____

(c) ☐ The Entity is a Passive Non-Financial Foreign Entity.[4]

[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.

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

If you have ticked 4.3(c) *Passive Non-Financial Foreign Entity*, you must now provide details of the Controlling Persons or Substantial U.S. Owners, please complete either i. OR ii. below

If the Entity has chosen to use the definition of 'Substantial U.S. Owner' from the U.S. Treasury Regulations in lieu of the definition of 'Controlling Person' as permitted under Article 4(7) of the Agreement between the Government of Jamaica and the Government of the United States of America to Improve International Tax Compliance and to Implement FATCA, please complete the table below providing details of any Substantial U.S. Owners.[5]

Note: The decision to utilize the definition of 'Substantial U.S. Owner' in lieu of Controlling Person is only permitted with respect to PART II: US IGA.

i. Indicate the full name, address, and tax reference type and number (e.g. TIN) of any *Substantial U.S. Owners.*

Full Name	**Full residence address**	**Tax reference type and number (e.g. TIN)**

OR

ii. Alternatively, if you wish to use the Controlling Person definition as per the definition in Exhibit A then please complete the following:

Please indicate the name of any *Controlling Person(s)*[6]:

Full Name of any Controlling Person(s)

Please complete Part III, Sections 5 - 7 below providing further details of each ultimate Controlling Persons who are natural persons. If there are no natural person(s) who exercise control of the Entity, then the Controlling Person will be the natural person(s) who hold the position of senior managing official (See Definition of Controlling Person in Exhibit A).

NOTE: AS US FATCA IS DIFFERENT FROM CRS YOU MUST ADDITIONALLY ANSWER ALL APPLICABLE QUESTIONS IN SECTIONS 5 – 7

[4] See definition of *Passive Non-Financial Foreign Entity* in Exhibit A
[5] See definition of *Substantial U.S. Owner(s)* in Exhibit A.
[6] See definition of *Controlling Person(s)* in Exhibit A.

Sagicor

PART III: Common Reporting Standard

Section 5: 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 FATCA purposes.

5.1 ☐ If the Entity **is** a *Financial Institution*[7], please tick this box and 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 Jurisdiction[8] under CRS. Specify the type of Financial Institution resident in a Non-Participating Jurisdiction below:

(a) ☐ Investment Entity and managed by another Financial Institution[9].

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 IV below providing further details of any ultimate Controlling Persons who are natural persons.

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

7 See definition of *Financial Institution* in Exhibit B.
8 See definition of *Non-Participating Jurisdiction* in Exhibit B.
9 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 B.

5.2 ☐ 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 Entity[10]

5.3 ☐ If the Entity is a *Passive Non-Financial Entity* please tick this box.[11]

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 IV 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 Entity 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: _____

Print Name: _____ Print Name:_____

Position/Title: _____ Position/Title: _____

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

If you have confirmed in section 5.1 or 5.2 above that the Entity is a Passive Non-Financial Foreign Entity or a Passive Non-Financial Entity, please complete a copy of section 7 for each Controlling Person.

[10] See definition of *Active Non-Financial Entity* in Exhibit B.

[11] Please see the definition of *Passive Non-Financial Entity* in Exhibit B.

Sagicor

PART IV: Controlling Persons

Please complete a copy of this section for each Controlling Person (must be a natural person)

Section 6 – Identification of a Controlling Person of the Account Holder

6.1 Name of Controlling Person:

Family Name or Surname(s): _____

First or Given Name: _____

Middle Name(s): _____

6.2 Current Residence Address:

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

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

Country: _____

Postal Code/ZIP Code: _____

6.3 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: _____

6.4 Date of birth *(dd/mm/yyyy)* _____

6.5 Place of birth

Town or City of Birth _____

Country of Birth _____

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

Legal name of **Entity 1** _____

Legal name of **Entity 2** _____

Legal name of **Entity 3** _____

Section 7 – Declaration of Tax Residences and related Taxpayer Reference Number or functional equivalent ("TIN")

Please indicate the Individual's tax residence. If resident in more than one jurisdiction you must detail all jurisdictions and provide an associated Tax Reference Number or Tax Identification Number (TIN) for each jurisdiction

Please complete the following table indicating:

(i) where the Controlling Person is tax resident;
(ii) the Controlling Person's TIN for each country/jurisdiction indicated;[12] *and,*
(iii) if the Controlling Person is a tax resident in a country/jurisdiction 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 jurisdictions, please use a separate sheet

	Jurisdiction(s) of Tax Residence	Tax reference number type	Tax reference number (e.g. TIN)	If no Tax Reference Number or TIN is available enter Reason A, B or C
1				
2				
3				

If applicable, please specify the reason for non-availability of a tax reference number (e.g. TIN), please provide the appropriate reason A, B or C as defined below:

Reason A — The country where the Controlling Person is resident does not issue Tax Reference Numbers or TINs to its residents.
Reason B — The Controlling Person is otherwise unable to obtain a Tax Reference Number (e.g. TIN). If this reason is selected, please explain why the Controlling Person is unable to obtain a Tax Reference Number (e.g. TIN)

_____

_____

Reason C — No Tax Reference Number or TIN is required because the tax residence jurisdiction that issued the TIN does not require a Financial Institution to collect and report the TIN.

If a Tax Reference Number (e.g. TIN) is not legally available please provide a functional equivalent (such as a business or company registration number or other similar form of identification). If the country does not supply one, please state N/A.

_____

[12] The Controlling Person's TIN is not required to be collected if the Controlling Person is not a Reportable Jurisdiction Person.

Sagicor

Section 8 – 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 Company– ***control by ownership***	☐	☐	☐
b. Controlling Person of a Company – ***control by other means***	☐	☐	☐
c. Controlling Person of a Company – ***senior managing official***	☐	☐	☐
d. Controlling Person of a Trust – ***settlor***	☐	☐	☐
e. Controlling Person of a Trust – ***trustee***	☐	☐	☐
f. Controlling Person of a Trust – ***protector***	☐	☐	☐
g. Controlling Person of aTrust – ***beneficiary***	☐	☐	☐
h. Controlling Person of a Trust – ***other exercising ultimate effective control***	☐	☐	☐
i. Controlling Person of a Legal Arrangement (non-trust) – ***settlor-equivalent***	☐	☐	☐
j. Controlling Person of a Legal Arangement (non-trust) – ***trustee-equivalent***	☐	☐	☐
k. Controlling Person of a Legal Arrangement (non-trust) – ***protector-equivalent***	☐	☐	☐
l. Controlling Person of a Legal Arrangement (non-trust) – ***beneficiary-equivalent***	☐	☐	☐
m. Controlling Person of a Legal Arrangement (non-trust) – ***other***	☐	☐	☐

Controlling Person Declaration and Undertakings

I acknowledge that the information contained in this form and information regarding the Controlling Person(s) and any Reportable Account(s) may be reported to the tax authorities of the jurisdiction in which the account(s) is/are maintained and exchanged with tax authorities of another jurisdiction(s) in which [I/the Controlling Person(s)] 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 Section 6 of this form or causes the information contained herein to become incorrect, and to provide the recipient with a suitably updated self-certification and Declaration within 30 days of such change in circumstances.

Sign: _____

Print name: _____

Date: _____

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: _____

Section 11: Sagicor Team Member Certification

Following my assessment of the AML/KYC information and documentation provided by the client, I confirm that the self-certification provided above seems:

[ ] **Reasonable**

[ ] **Unreasonable** and the client requested to provide a revised Self-Certification. Please complete additional information in the shaded area below.

Signature: Date: (dd/mm/yyyy):	If '**Unreasonable**' is selected, please give reasons for this selection:
Print Name:	Capacity:

Sagicor

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 (including an excepted NFFE) 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 persons[19]:

(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 interest[20] 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.

[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%).

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 ;
(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

Substantial U.S. Owner (as defined in Regulations section 1.1473-1(b)) means generally:

(a) With respect to any foreign corporation, any Specified U.S. Person that owns, directly or indirectly, more than 10 percent of the stock of such corporation (by vote or value);
(b) With respect to any foreign partnership, any Specified U.S. Person that owns, directly or indirectly, more than 10 percent of the profits interests or capital interests in such partnership; and
(c) In the case of a trust–
    i. Any Specified U.S. Person treated as an owner of any portion of the trust under sections 671 through 679 of the IRC; and
    ii. Any Specified U.S. Person that holds, directly or indirectly, more than 10 percent of the beneficial interests of the trust.

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.

Trustee Documented Trust means trust established under the laws of Jamaica to the extent that the trustee of the trust is a Reporting U.S. Financial Institution, Reporting Model 1 FFI, or Participating FFI and reports all information required to be reported pursuant to the Agreement with respect to all U.S. Reportable Accounts of the trust.

EXHIBIT B

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 persons[23]:

(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 interest[24] 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;

[23] 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.

[24] 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%).

(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
(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.