

SELF CERTIFICATION FORM TO ESTABLISH TAX STATUS – LEGAL ENTITIES

The Organisation for Economic Co-operation and Development (OECD) released a model Competent Authority Agreement (CAA) and Common Reporting Standard (CRS) designed to create a global standard for the automatic exchange of financial information. To satisfy the Standard for the automatic exchange of financial account information between tax authorities worldwide, Participating Jurisdictions (including Cyprus) must obtain information from their financial institutions and exchange that information automatically with partner countries annually.

More information about OECD Common Reporting Standard can be found on the website of the OECD at: <http://www.oecd.org/tax/automatic-exchange/> and <http://www.oecd.org/ctp/exchange-of-tax-information/CRS-related-FAQs.pdf>.

Based on the Agreement between the Government of the Republic of Cyprus and the Government of the United States of America to improve international tax compliance and to implement FATCA, the OECD Common Reporting Standard, the Multilateral Competent Authority Agreement on Automatic Exchange of Financial Account Information (the "MCAA"), the Administrative Cooperation in the field of taxation (Amending) Law of 2016 (the "Law"), and the Decrees issued by the Cyprus Ministry of Finance for the implementation of FATCA and CRS (the "FATCA and CRS Decrees"), we are required to collect and review certain information in order to identify the tax residency or multiple tax residencies of each Account Holder, including the tax residency(ies) of an entity's Controlling Persons in certain cases. We may also be required to report certain information relating to the Account Holder and its account (including an entity's Controlling Persons) with the Cyprus Tax Department that in turn may pass this information to other relevant tax authorities.

Please complete the following sections as directed. This form should be completed by the Account Holder (and not by any third party intermediary). Section A will declare the FATCA status and Section B will declare the CRS status of the entity. Please complete both sections. A glossary of terms is attached to assist you in completing this form.

As a financial institution, we are not allowed to give tax advice. If you have any questions about this form, please consult your tax/legal advisors.

ENTITY GENERAL INFORMATION	
Entity Name:	
Country of incorporation/organization:	
Registered Address:	
Registration Number:	

TAX RESIDENCY DETAILS			
Country(ies) of Tax Residency *		Taxpayer Identification Number (TIN) – If a TIN is unavailable, please specify the appropriate reason using the key below (A, B or C) **	
1		1	
2		2	

* If the entity has no residency for tax purposes, please indicate the entity's place of effective management or country of principal office.

** **Key: Please use the following key (A, B or C) to specify the reason the TIN is unavailable:**

Reason A: The country where the Account Holder is resident for tax purposes does not issue TINs to its residents.

Reason B: No TIN is required (select this reason only if the domestic law of the relevant jurisdiction does not require the collection of the TIN issued by such jurisdiction).

Reason C: The Account Holder is otherwise unable to obtain a TIN or equivalent number. If Reason C is selected, please explain the reason a TIN or equivalent number is unavailable in the box above.

If a TIN has not been provided for the Account Holder's country(ies) of tax residency above, it is certified that Dragon Capital (Cyprus) Limited will promptly be informed in case a TIN is obtained.

SECTION A: DECLARATION OF FATCA STATUS

PART 1 - US ENTITIES	
The signatory hereby declares that the entity is:	
<input type="checkbox"/>	Specified US Person
<input type="checkbox"/>	Non-Specified US Person
<input type="checkbox"/>	US Financial Institution
Taxpayer Identification Number (TIN)	

PART 2 - FOREIGN FINANCIAL INSTITUTIONS	
The signatory hereby declares that the entity is:	
<input type="checkbox"/>	Participating Foreign Financial Institution (PFFI) Please provide us with your Global Intermediary Identification Number (GIIN):
<input type="checkbox"/>	Non-Participating Foreign Financial Institution (NPFFI)
<input type="checkbox"/>	Exempt Beneficial Owner Please state the reason for the exemption:
<input type="checkbox"/>	Entity wholly owned by Exempt Beneficial Owners Please state the reason for the exemption:
<input type="checkbox"/>	US Owner documented Financial Institution Please complete Part 4
<input type="checkbox"/>	Non-US Owner documented FI
<input type="checkbox"/>	Certified deemed compliant Financial Institution Please indicate the exact exemption:
<input type="checkbox"/>	Registered deemed compliant Financial Institution Please provide us with your Global Intermediary Identification Number (GIIN)
<input type="checkbox"/>	Territory Financial Institution
<input type="checkbox"/>	Sponsored Financial Institution Please provide us with your Sponsor's Global Intermediary Identification Number (GIIN)

PART 3 - NON-FINANCIAL FOREIGN ENTITIES (NFFE)	
The signatory hereby declares that the entity is:	
<input type="checkbox"/>	Active NFFE
<input type="checkbox"/>	Passive NFFE Please complete Part 4 if Controlling Persons of the entity are US citizens/ residents for tax purposes
<input type="checkbox"/>	Direct reporting Passive NFFE Please provide us with your Global Intermediary Identification Number (GIIN):
<input type="checkbox"/>	Sponsored direct reporting Passive NFFE Please provide us with your Sponsor's Global Intermediary Identification Number (GIIN):
<input type="checkbox"/>	Sponsored direct reporting NFFE Please provide us with your Sponsor's Global Intermediary Identification Number (GIIN):

PART 4 - SUMMARY OF CONTROLLING US TAX REPORTING PERSONS				
This part must be completed only where the Controlling Persons of the entity are US citizens/residents for tax purposes.				
A/A	Full Name	Position	Country(ies) of Tax Residence	US TIN
1.				
2.				

SECTION B: DECLARATION OF CRS STATUS

PART 5 - CRS STATUS (select only one status from A-C) The signatory hereby declares that the Account Holder is:	
A.	Financial Institution
	i) Investment Entity [must complete (a) or (b)]
<input type="checkbox"/>	(a) An Investment Entity located in a Non-Participating Jurisdiction and managed by another Financial Institution. Please complete Part 6 below;
<input type="checkbox"/>	(b) Other Investment Entity
<input type="checkbox"/>	(ii) Depository Institution, Custodial Institution or Specified Insurance Company.
B.	Active Non-Financial Entity (NFE)
<input type="checkbox"/>	(i) A corporation the stock of which is regularly traded on an established securities market or a corporation which is a Related Entity of such a corporation. Please provide the name of the established securities market on which the corporation is regularly traded or if you are a Related Entity of a regularly traded corporation please provide the name of the regularly traded corporation that the entity is a related entity of:
<input type="checkbox"/>	(ii) A Governmental Entity or Central Bank
<input type="checkbox"/>	(iii) An International Organisation
<input type="checkbox"/>	(iv) Other than (i)-(iii)
C.	<input type="checkbox"/> Passive Non-Financial Entity (NFE) – other than an Investment Entity described under Part 5 A (i) (a) above. Please complete Part 6 below.

PART 6 – SUMMARY OF CONTROLLING PERSON TAX RESIDENCY						
Please complete this part if you have marked Part 5 A (i) (a) or Part 5 C. Information about all Controlling Persons should be provided. In case of multiple tax residencies please use separate lines.						
A/A	Full Name	Current Residence Address	Country(ies) of Tax Residency *	TIN **	Date of Birth	Country of Birth
1.						
2.						
<p>* If the Controlling Person is a resident of Cyprus for tax purposes and has no tax residency in any other country, TIN is not required.</p> <p>** If a TIN is unavailable, please indicate the appropriate reason (A, B or C as below) in the box above: Reason A: The country where the Controlling Person is resident for tax purposes does not issue TINs to its residents. Reason B: No TIN is required (select this reason only if the domestic law of the jurisdiction in which the Controlling Person is a tax resident does not require the collection of the TIN issued by such jurisdiction). Reason C: The Controlling Person is otherwise unable to obtain a TIN or equivalent number. If Reason C is selected, please explain the reason a TIN is unavailable in the box above.</p> <p>If Controlling Persons have not provided a TIN for their country(ies) of tax residency in the table above, the Account Holder undertakes to promptly inform Dragon Capital (Cyprus) Limited as soon as a TIN is obtained.</p>						

PART 7 - DECLARATION AND SIGNATURE

We hereby confirm and declare that we understand that Dragon Capital (Cyprus) Limited (further "DCCL") is under obligation to collect, maintain, process and use any information we have provided about the entity and its Controlling Persons, in order to comply with the applicable requirements relating to the automatic exchange of information under local laws.

We hereby confirm and declare that we understand that DCCL has the obligation to provide information relating to the entity, its Controlling Persons and the account, to the Cyprus Tax Department and/or other authorities in Cyprus or elsewhere in the world for tax reporting purposes, where DCCL is required to do so.

We agree to provide to DCCL at request any additional information, certificates or other documents required.

We hereby confirm and declare that we have carefully read and understood the content of the Privacy Notice, regarding the processing of our personal data for the purposes of the entity entering into and carrying out a business and/or contractual relationship with the DCCL and of our rights in this respect.

We undertake to ensure that every Controlling Person whose information has been provided to DCCL has been notified of the collection, processing, maintenance, transfer and disclosure of their information as set out herein and to deliver and/or make available the DCCL's Privacy Notice to them and/or notify them of the aforesaid document, without undue delay.

As a representative authorized to sign on behalf of the entity, I declare that I have examined the information on this form and that to the best of my knowledge and belief it is true, correct and complete.

As a representative authorized to sign on behalf of the entity, I agree that I will submit a new form within 30 days if any certification on this form that may occur in above mentioned information becomes incorrect.

In case where a GIIN has been applied for but is not available yet, the entity commits to provide it to the DCCL within 90 days.

If the representative authorized to sign is jointly authorized, please note that in that case this form has to be signed by at least two of the jointly authorized representatives.

Name	Position	Signature	Date

FATCA Key Terminology

Active NFFE: an entity that operates an active trade or business other than that of a financial business and meets any of the following criteria:

- 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;
- 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;
- The NFFE is organized in a US Territory and all of the owners of the payee are bona fide residents of that US Territory;
- The NFFE is a government (other than the US 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 US Territory, an international organization, a non-US central bank of issue, or an Entity wholly owned by one or more of the foregoing;
- 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;
- 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;
- 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;
- 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;
- The NFFE is an "excepted NFFE" as described in relevant US Treasury Regulations; or
- The NFFE meets all of the following requirements:
 - 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 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;
 - It is exempt from income tax in its jurisdiction of residence;
 - It has no shareholders or members who have a proprietary or beneficial interest in its income or assets;
 - 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
 - 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 organization, or escheat to the government of the NFFE's jurisdiction of residence or any political subdivision thereof.

Certified Deemed compliant Financial Institution: are the FIs specified in Annex II of the Intergovernmental Agreement.

Controlling Person:

a) For companies and cooperative societies the ultimate beneficial owner, which is the natural person(s) who exercise(s) direct or indirect control over a company or cooperative society:

Sufficient direct or indirect control is considered to be exercised in any of the following cases:

- i. Where a natural person holds a percentage exceeding 25% of the voting rights of the shares;
- ii. Where a natural person has control by means other than the holding of more than 25% of the voting rights of the shares, the right to appoint members of the Board of Directors of the legal entity, the right to exercise

significant influence or control exceeding 25% of the legal entity, the right to exercise a dominant influence or control of another legal entity that has significant influence exceeding 25% of the legal entity as interpreted in accordance with the Financial Action Task Force Recommendations.

Where no natural person(s) is identified as exercising control of the entity, the Controlling Person(s) of the entity will be the natural persons(s) who hold the position of senior managing official except for entities that are (or are majority owned subsidiaries of) an entity that is listed on a stock exchange and are subject to market regulation and disclosure requirements to ensure adequate transparency of beneficial ownership.

- a) For unions, administrative committees, foundations, clubs, associations and fund raising committees, means the members of the Board of Directors/Committee and administrators of accounts.
- b) For trusts accounts the settlors, trustees, the protectors (if any), the beneficiaries or classes of beneficiaries and any other natural person or persons exercising ultimate effective control over the trust.

Exempt Beneficial Owners: are those specified in Annex II of the IGA between the Republic of Cyprus and the United States.

Foreign Financial Institution (FFI): The term *FFI* means, with respect to any entity that is not resident in a country that has in effect a Model 1 IGA or Model 2 IGA, any financial institution that is a foreign entity; with respect to any entity that is resident in a country that has in effect a Model 1 or Model 2 IGA any entity that treated as Financial Institution pursuant to such Model 1 IGA or Model 2 IGA. A territory financial institution is not an FFI.

GIIN – Global Intermediary Identification Number: A Foreign Financial Institution that registers on the “FATCA Registration Website” (<http://www.irs.gov/Businesses/Corporations/Foreign-Account-Tax-Compliance-Act-FATCA>), upon approval, will receive a (GIIN) from the IRS.

Non-Financial Foreign Entity (NFFE): a foreign entity that is not a financial institution (including a territory NFFE) or a foreign entity treated as a NFFE pursuant to a Model 1 IGA or Model 2 IGA.

Passive NFFE: A “Passive NFFE” means any NFFE that is not (i) an Active NFFE, or (ii) a withholding foreign partnership or withholding foreign trust pursuant to relevant US Treasury Regulations. Generally, Passive entities are defined as entities, organizations, or companies that are in receipt of passive income or hold passive assets that do not fall under any of the other FATCA classifications. These entities do not carry on the business of a Financial Institution.

- Passive income includes:
 - Dividends, including income equivalent to dividends
 - Interest, including income equivalent to interest and certain returns from investments in insurance contracts
 - Certain rents and royalties other than those derived from an active trade of business
 - Annuities
 - Net gains from transactions, including forwards and similar transactions relating to certain types of transactions in commodities
 - Certain foreign currency exchange gains
 - Net income from notional principal contracts
 - Amounts received under cash value insurance contracts or amounts earned by an insurance company in connection with its reserves for insurance and annuity contracts
 - Net gains from sale of assets that give rise to certain of the above types of income
- Passive income excludes:
 - 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
 - Income generated by certain commodities dealers and securities dealers and securities dealers in the ordinary course of business

Specified U.S. Person: means a U.S. Person, other than: (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; (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; (v) any organization 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; (vi) any bank as defined in section 581 of the U.S. Internal Revenue Code; (vii) any real estate investment trust as defined in section 856 of the U.S. Internal Revenue Code; (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); (ix) any common trust fund as defined in section 584(a) of the U.S. Internal Revenue

Code; (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; (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; (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.

US TIN: US federal Taxpayer Identification Number.

US Person: The term "US Person" means a US 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 US 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 US Internal Revenue Code.

The definitions provided within the FATCA Terminology section, are primarily based on the Intergovernmental Agreement between the Republic of Cyprus and the United States (the "IGA") as well as the Decree issued by the Cyprus Ministry of Finance relating to the implementation of FATCA (the "FATCA Decree").

Official definitions of terms within the CRS Decree are in the Greek language.

These definitions provided herein are provided for information purposes only and should not be construed as legal or tax advice. DCCL will not be responsible for any changes in the definitions included in the FATCA IGA or the FATCA Decree.

For the full definition or for any other terms and definitions, please refer to the website of the U.S. Internal Revenue Service (IRS) at www.irs.gov/fatca and the website Cyprus Tax department at http://www.mof.gov.cy/mof/taxdep.nsf/page28_en/page28_en?OpenDocument.

CRS Key Terminology

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 of another person as agent, custodian, nominee, signatory, investment advisor, intermediary, or a legal guardian, is not treated as holding the account for the purposes of the Common Reporting Standard, and such other person is treated as the Account Holder. With respect to a jointly held account, each holder is treated as an Account Holder.

Active NFE: means any NFE that meets any of the following criteria:

- 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;
- 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;
- the NFE is a Governmental 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 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;
- 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;
- the NFE was not a Financial Institution in the past five years, and is in the process of liquidating its assets or is reorganizing with the intent to continue or recommence operations in a business other than that of a Financial Institution;
- 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
- 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.

Central Bank: means the Central Bank of Cyprus or the Central Bank of other Jurisdictions (EU countries and third countries).

Common Reporting Standard: means the standard for automatic exchange of financial account information in tax matters developed by the OECD.

Controlling Person means:

- a) For companies and cooperative societies the ultimate beneficial owner, which is the natural person(s) who exercise(s) direct or indirect control over a company or cooperative society:

Sufficient direct or indirect control is considered to be exercised, inter alia, in any of the following cases:

- i. Where a natural person holds a percentage exceeding 25% of the voting rights of the shares;
- ii. Where a natural person has control by means other than the holding of more than 25% of the voting rights of the shares, the right to appoint members of the Board of Directors of the legal entity, the right to exercise significant influence or control exceeding 25% of the legal entity, the right to exercise a dominant influence or control of another legal entity that has significant influence exceeding 25% of the legal entity as interpreted in accordance with the Financial Action Task Force Recommendations.

Where no natural person(s) is identified as exercising control of the entity, the Controlling Person(s) of the entity will be the natural persons(s) who hold the position of senior managing official except for entities that are (or are majority owned subsidiaries of) an entity that is listed on a stock exchange and are subject to market regulation and disclosure requirements to ensure adequate transparency of beneficial ownership.

- b) For unions, administrative committees, foundations, clubs, associations and fund raising committees, means the members of the Board of Directors/Committee and administrators of accounts.
- c) For trusts accounts the settlors, trustees, the protectors (if any), the beneficiaries or classes of beneficiaries and any other natural person or persons exercising ultimate effective control over the trust.
- d) In the case of legal entities such as foundations and other legal entities similar to trusts, Controlling Persons include the natural persons or persons holding equivalent or similar position with persons referred in subparagraph (c) above.

Custodial Institution: means any Entity that holds, as a substantial portion of its business, Financial Assets for the account of others if the entity's gross income attributable to the holding of Financial Assets and related financial services equals or exceeds 20% of the entity's gross income during the shorter of: (i) the three-year period that ends on 31 December (or the final day of a non-calendar year accounting period) prior to the year in which the determination is being made; or (ii) the period during which the Entity has been in existence.

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.

Financial Account: means an account maintained by a Financial Institution, and includes Depository Accounts, Custodial Accounts, Equity and Debt interests in certain Investment Entities, Cash Value Insurance Contracts, and Annuity Contracts.

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

Governmental Entity: means the government of a jurisdiction, any political subdivision of a jurisdiction, or any wholly owned agency or instrumentality of a jurisdiction or of any one or more of the foregoing. This category is comprised of the integral parts, controlled entities, and political subdivisions of a jurisdiction.

An “integral part” of a jurisdiction means any person, organisation, agency, bureau, fund, instrumentality, or other body, however designated, that constitutes a governing authority of a jurisdiction. The net earnings of the governing authority must be credited to its own account or to other accounts of the jurisdiction, with no portion inuring to the benefit of any private person. An integral part does not include any individual who is a sovereign, official, or administrator acting in a private or personal capacity.

A “controlled entity” means an entity that is separate in form from the jurisdiction or that otherwise constitutes a separate juridical entity, provided that:

- i) the entity is wholly owned and controlled by one or more Governmental Entities directly or through one or more controlled entities;
- ii) the entity's net earnings are credited to its own account or to the accounts of one or more Governmental Entities, with no portion of its income inuring to the benefit of any private person; and
- iii) the entity's assets vest in one or more Governmental Entities upon dissolution.

Income does not inure to the benefit of private persons if such persons are the intended beneficiaries of a governmental programme, and the programme activities are performed for the general public with respect to the common welfare or relate to the administration of some phase of government. Notwithstanding the foregoing, however, income is considered to inure to the benefit of private persons if the income is derived from the use of a governmental entity to conduct a commercial business, such as a commercial banking business, that provides financial services to private persons.

International Organisation: means any international organisation or wholly owned agency or instrumentality thereof. This category includes any intergovernmental organisation (including a supranational organisation) (1) that is comprised primarily of governments; (2) that has in effect a headquarters or substantially similar agreement with the jurisdiction; and (3) the income of which does not inure to the benefit of private persons.

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, 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 as described in subparagraph (a) above.
- c) An Entity is treated as primarily conducting as a business one or more of the activities described in subparagraph (a) above, or an entity's gross income is primarily attributable to investing, reinvesting, or trading in Financial Assets for purposes of subparagraph (b) above, 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 NFE.
- d) The term “Investment Entity” does not include an Entity that is an Active NFE because it meets any of the criteria in subparagraphs D(9)(d) through (g), of Section VIII of the CRS.

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.

NFE means any Entity that is not a Financial Institution.

Participating Jurisdiction means a jurisdiction:

which has committed itself to apply the standard for the automatic exchange of financial account information and which is identified in a published list.

For the relevant list of participating jurisdictions please refer to the OECD website at <http://www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/crs-by-jurisdiction/#d.en.345489> or any other list issued by relevant authorities.

Passive NFE means any:

- a) NFE that is not an Active NFE; or
- b) an Investment Entity as described in subparagraph A(6)(b) of the Investment Entity definition in Section VIII of the CRS that is not a Participating Jurisdiction Financial Institution.

Participating Jurisdiction Financial Institution means:

- (a) 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
- (b) any branch of a Financial Institution that is not Resident in a Participating Jurisdiction if that branch is located in such Participating Jurisdiction.

Related Entity: An Entity is a "Related Entity" of another Entity if

- (a) either Entity controls the other Entity; or
- (b) the two Entities are under common control; or
- (c) the two Entities are Investment Entities described in subparagraph A(6)(b) of the Investment Entity definition in Section VIII of the CRS, 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.

Specified Insurance Company: means any Entity that is an insurance company (or the holding company of an insurance company) that issues, or is obligated to make payments with respect to, a Cash Value Insurance Contract or an Annuity Contract.

TIN: means Taxpayer Identification Number (or functional equivalent in the absence of a Taxpayer Identification Number). A TIN is a unique combination of letters or numbers, however described, assigned by a jurisdiction to an individual or an Entity and used to identify the individual or Entity for the purposes of administering the tax laws of such jurisdiction.

Some jurisdictions do not issue a TIN. However, these jurisdictions often utilise some other high integrity number with an equivalent level of identification (a "functional equivalent"). Examples of that type of number include, for individuals, a social security/insurance number, citizen/personal identification/service code/number, and resident registration number and for Entities, a business/company registration code/number.

The definitions provided within the CRS Terminology section, are primarily based on the OECD Common Reporting Standard for Automatic Exchange of Financial Account Information (the "CRS") and the associated Commentaries to the CRS, as well as the Decree issued by the Cyprus Ministry of Finance relating to the implementation of OECD Common Reporting Standard (CRS) (the "CRS Decree"). Official definitions of terms within the CRS Decree are in the Greek language.

These definitions provided herein are provided for information purposes only and should not be construed as legal or tax advice. DCCL, will not be responsible for any changes in the definitions included in the CRS and the associated Commentary to the CRS, or the CRS Decree.

For the full definition or for any other terms and definitions, please refer to the CRS, the Commentaries to the CRS, the CRS Decree or the website of the Organisation for Economic Cooperation and Development (OECD) at <http://www.oecd.org/tax/automatic-exchange/>.