

Investec Bank (Channel Islands) Limited
Master Trust and Company Service Provider
General Application Form



Out of the Ordinary



Investec

Private Banking

Before you apply

Important notes regarding the completion of the Master Trust and Company Service Provider General Application Form

1. Please complete this form by typing in the available fields and post back to us:
Corporate Client Services
Investec Bank (Channel Islands) Limited
PO Box 188
Gategny Court
Gategny Esplanade
St Peter Port
Guernsey GY1 3LP

Or send by courier to our registered address:
Corporate Client Services
Investec Bank (Channel Islands) Limited
Gategny Court
Gategny Esplanade
St Peter Port
Guernsey
GY1 1WR
2. Complete all relevant sections fully.
3. When submitting documents, ensure that you have included all additional documents required in Sections 2 and 3. Certified copies of personal documents must not be certified by the individual concerned.
4. Make sure that you have read and understood the Data Protection Notice, General Terms and Conditions and Schedule of Charges and, where applicable, the Special Terms and Conditions and/or Facility Letter.
5. Retain a copy of Section 3 of this general application form – 'Requirements for opening new designated Accounts'.
6. At least two directors who have the capacity to bind the Company to any Account we may agree to open, must complete all sections, and sign the application and declaration.

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General and Special Terms and Conditions supplied separately

Section 1

Company details

To be completed by the Trust and Corporate Service Provider.

Company name

Date of incorporation

Country of incorporation

Regulatory body

Date of last regulatory visit/review

Nature of company business/main business activities

Registration number (if applicable)

Entity type – you must ensure that both FATCA and CRS classifications are indicated:

FATCA

Registered deemed compliant FFI

Participating FFI/Model 1 or 2 IGA FFI

Non-participating FFI – Investec will not service non-participating FFIs

CRS

Reporting Financial Institution

Non-Reporting Financial Institution

Does the company have a Global Intermediary Identification Number (GIIN) issued by the US Inland Revenue Service? Yes No

If it does, please provide the GIIN

Is a sponsoring entity acting on behalf of the company to perform all due diligence, withholding and reporting obligations under FATCA (Foreign Account Tax Compliance Act)? Yes No

If it does, please provide:

Name of sponsoring entity

GIIN

Registered address

Country Postcode

Mailing address (if different)

Country Postcode

Contact name Role in company

Telephone Country code Number

Mobile number Country code Number

For country code 001, please state name of country

Email address

We may contact you on any of the above details but please indicate your preferred method of contact. Please tick **one** box only.

Email Mobile Telephone Letter

Section 2

Controllers and owners

Legal existence

Please provide valid originally certified copies of the following documents to prove the legal existence and registered office of the company:

- | | | |
|--|---|---|
| <input type="checkbox"/> Certificate of Incorporation | <input type="checkbox"/> Corporate structure chart | <input type="checkbox"/> Copy of regulatory licence or equivalent |
| <input type="checkbox"/> Change of Name Certificate(s) (if applicable) | <input type="checkbox"/> Register of Directors | |
| <input type="checkbox"/> Memorandum & Articles of Association | <input type="checkbox"/> Register of Members/Shareholders | |

Identification and verification of Directors

Please provide a valid originally certified copy passport and utility bill for each person to verify their identity and permanent residential address.

If there are corporate directors, please provide valid originally certified copies of the documents listed above under "Legal existence".

Surname/Entity name	Forename(s)	Date of birth/ incorporation
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>

Identification of authorised signatories

Please insert the full names of each authorised signatory unless you are attaching a separate signature list; in which case state "Attached" (see section 7.8).

Surname/Entity name	Forename(s)
<input type="text"/>	<input type="text"/>

Identification and verification of Controlling Shareholders (> 25%)

Controlling Shareholders must be identified and verified. For these purposes a Controlling Shareholder is defined as an individual shareholder with an interest of 25% or more. This includes individual shareholders with a 25% or more shareholding or 25% of the voting rights, and includes connected parties where the ultimate holding interest, if combined, would amount to 25% or more e.g. immediate family members. Where the Controlling Shareholder is a corporate entity or trust please refer to the point below regarding Ultimate Control.

Please provide valid originally certified copies of passport and utility bill for each person to verify identity and permanent residential address:

Surname/Entity name	Forename(s)	Date of birth/ incorporation	% shareholding >25%
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Section 2 Controllers and owners

Identification of minority shareholders

Minority shareholders – please complete all named shareholders of the entity with a shareholding or voting rights between 10% and 24.99% (where applicable).

Surname/Entity name	Forename(s)	Date of birth/ incorporation	% shareholding between 10% and 24.99%
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>

Ultimate control

Where any of the owners of the company are other corporate entities or trusts, their controllers must also be identified in the same way as the Trust and Corporate Service Provider. This must also include the identity of its directors/trustees and the ultimate underlying (natural person) beneficial owners/settlor/beneficiary/protector – if not already identified above.

Surname/Entity name	Forename(s)	Date of birth/incorporation
<input type="text"/>	<input type="text"/>	<input type="text"/>
Capacity: Ultimate Beneficial Owner/Settlor/Beneficiary/Protector	% shareholding	
<input type="text"/>	<input type="text"/>	

Surname/Entity name	Forename(s)	Date of birth/incorporation
<input type="text"/>	<input type="text"/>	<input type="text"/>
Capacity: Ultimate Beneficial Owner/Settlor/Beneficiary/Protector	% shareholding	
<input type="text"/>	<input type="text"/>	

Surname/Entity name	Forename(s)	Date of birth/incorporation
<input type="text"/>	<input type="text"/>	<input type="text"/>
Capacity: Ultimate Beneficial Owner/Settlor/Beneficiary/Protector	% shareholding	
<input type="text"/>	<input type="text"/>	

Surname/Entity name	Forename(s)	Date of birth/incorporation
<input type="text"/>	<input type="text"/>	<input type="text"/>
Capacity: Ultimate Beneficial Owner/Settlor/Beneficiary/Protector	% shareholding	
<input type="text"/>	<input type="text"/>	

Section 3

Requirements for opening new designated Accounts

This section sets out the parameters of this relationship and the account opening process going forward.

Each time a new designated Account is established, which is controlled by you, you will be the Applicant for business and we will require, as a minimum, the following documentation for Trustee/Corporate/Foundation:

- (a) Completion of our relevant Short Form Mandate;
- (b) A fully completed Trust and Corporate Service Provider Designated Account Application Form duly signed by your appropriate authorised signatories.
- (c) Full Customer Identification and Verification documentation on all directors and trustees including any which are external to the Trust and Corporate Service Provider;
- (d) Where there are any directors / trustees external to the Trust and Corporate Service Provider a signed External Director letter confirming that they are aware of the Account and that they consent to it being controlled by the Trust and Corporate Service Provider;
- (e) Underlying identification verification documentation as follows:
 - Structure chart where applicable;
 - Valid Proof of address and identity (Passport and Utility bill) for each beneficial owner and controller (BO&C) named on the Designated Account Application Form;
 - Trust Accounts – extracts of all the relevant trust deed(s) naming each BO&C including, where appropriate, any Deeds of Retirement and Appointments and Declaration of Trust;
 - Corporate Accounts – a Certificate of Incorporation, Change of name Certificate, Share Register and Directors Register for the Client being opened together with the share registers of each intermediate corporate entity in the ownership structure;
 - Foundation Accounts – extracts of all the relevant Foundation charter(s) naming each BO&C including, where appropriate, any amendments – retirements and appointments.

In any of these scenarios if you wish to open a new designated Account with us where the underlying client or entity could be considered to be **high risk** by way of either **business activity, geographical location, adverse media, politically exposed, commercially sensitive or high profile** then we will require you to discuss these circumstances with us before requesting us to open the Account. Should we agree to open the Account you will be required to provide what evidence you hold which verified the Client source of wealth and source of funds. In this regard:

Politically Exposed Person (PEP)

We would expect you to use, as a minimum, the definition given in the Guernsey Financial Services Commission Handbook on Countering Financial Crime and Terrorist Financing. Should you be in any doubt we would request that you discuss this proposed new Account with us prior to any new Account documentation being sent to us.

“Politically Exposed Person” means –

- (i) a person who has, or has had at any time or is actively seeking a prominent public function or who has been elected or appointed to such a function in a country or territory including, without limitation –
 - (a) heads of state or heads of government
 - (b) senior politicians and other important officials of political parties
 - (c) senior government officials
 - (d) senior members of the judiciary
 - (e) senior military officers
 - (f) senior executives of state owned body corporates
- (ii) an immediate family member of such a person including, without limitation, a spouse, partner, parent, child, sibling, parent-in-law or grandchild of such a person and in this subparagraph “partner” means a person who is considered by the law of the country or territory in which the relevant public function is held as being equivalent to a spouse, or
- (iii) a close associate of such a person, including, without limitation a person who is widely known to maintain a close business relationship with such a person, or a person who is in a position to conduct substantial financial transactions on behalf of such a person.

Commercially Sensitive – High Profile Individual (“HPI”)

Similarly we would request that in the situation where the underlying client is a HPI we would request that you discuss this proposed new Account with us prior to any new Account documentation being sent to us. A definition of a HPI is an individual who may be regarded as a commercially exposed person because of his or her position as a senior executive of a well known commercial enterprise; or an individual with a high profile in the community/world who may be able to influence public opinion or currently occupy or previously occupied, or are actively being considered for a senior public position or media exposed. Examples would include sports personalities as well as someone who was looking to move into politics.

Section 3

Requirements for opening new designated Accounts

Sensitive country and sensitive business activities list

Please ensure you are fully familiar with Investec's list of sensitive countries & sensitive business activities as amended from time to time (provided separately).

If you have a corporate structure involved in any business which you yourselves deem to be high risk we would request that you discuss the proposed new Account with your Relationship Manager prior to any new Account documentation being sent to us.

If you have a prospective client who either resides in or carries out business activities from any high risk jurisdiction, please discuss the proposed new Account with us prior to any new Account documentation being sent to us.

PO Box addresses

Documents confirming an address that list a PO Box should show a supply address for the service or evidence linking the PO Box to the residential address given. Alternatively you may provide us with an original or originally certified letter from a director or officer of a reputable overseas employer that confirms the principal private residence at the stated address (or provides detailed directions to locate the stated address); or an original or originally certified letter of introduction from a financial services business operation from an Acceptable country as defined in the Investec Designated Account Application Form as amended from time to time, confirming the stated address as the principal private residence.

Certifying documents

For certifications to be effective, the suitable certifier must have met the individual (where certifying evidence of identity contains a photograph) and have seen the original documentation. The certifier must sign and date the copy identification data and include their printed name, address and qualification as well as any other adequate information so that contact can be made with the certifier in the event of a query. This must state: "I certify that this is a complete and accurate copy of the original passport which I have seen of [insert name of individual] whom I have met face to face and the photograph bears a true likeness to the individual portrayed."

The certifier must be a person/organisation of reputable standing who is independent of the Applicant and who has no family connection with the Applicant(s) wishing to open the Account.

The following is a list of examples of suitable certifiers:

- a member of the judiciary or senior civil servant
- an officer of embassy, consulate or high commission of the country or territory of issue of documentary evidence of identity
- a lawyer or notary public who is a member of a recognised professional body
- an actuary or accountant who is a member of a recognised professional body
- a member of the Institute of Chartered Secretaries and Administrators
- a director or officer of a financial services business operating from an Acceptable Country set out in the Investec Designated Account Application Form or of a financial services business subject to group/parent policy where the Head Office is situated in an Acceptable country listed in the Investec Designated Account Application Form as updated from time to time
- a director or officer of the regulated Trust and Corporate Service Provider whom we have risk assessed and determined to be an acceptable suitable certifier.

We are unable to accept re-certified copies of certified copies unless the Trust and Corporate Service Provider is operating from a low risk (Guernsey Financial Services Commission Handbook Appendix C) equivalent Jurisdiction.

Verification of Identification documents received from a Trust and Corporate Service Provider which is not operating from a low risk (Guernsey Financial Services Commission Handbook Appendix C) equivalent Jurisdiction must be valid and unexpired at the date of opening.

Verification of address documents received from a Trust and Corporate Service Provider which is not operating from a low risk (Guernsey Financial Services Commission Handbook Appendix C) equivalent Jurisdiction must not be older than three months from the date of receipt.

NB: Certified copies of personal documents must not be certified by the individual concerned.

Certification of Corporate Documents may **ONLY** be certified by the company secretary, director, manager or equivalent officer.

FATCA (Foreign Account Tax Compliance Act) and CRS (OECD Common Reporting Standard)

We will only enter into a business relationship with a Trust and Service Corporate Provider who is registered as a Financial Institution with the US Internal Revenue Service and have agreed to fulfil the obligations of a Reporting Financial Institution under the OECD Common Reporting Standard.

We expect you to establish the tax status of your clients and that you will undertake the relevant tax reporting for all entities controlled by you.

Section 4 Account location

Your Accounts will be domiciled in Guernsey.

Section 5 Corporate resolution

To: Investec Bank (Channel Islands) Limited

We hereby certify that the following resolution of the board of directors for

Limited, was passed at a meeting of the board held on the

and has been duly recorded in the minute book of the said company.

Resolved that the said company, may open/control Accounts with Investec Bank (Channel Islands) Limited whose registered office is Gategny Court, Gategny Esplanade, St Peter Port, Guernsey GY1 1WR ("Investec") and that Investec be and is hereby empowered to honour cheques, bills of exchange, and promissory notes, drawn, signed, accepted, or made on behalf of the company, and to act on any instructions given by the persons so authorised in Section 7 of this application form with regard to any Accounts whether in credit or overdrawn or any transaction of the company.

Chairman/Director

Print name

Date

Company Secretary/Director

Print name

Date

Section 6

Indemnity to operate Accounts by signed fax/email – optional

We hereby authorise Investec Bank (Channel Islands) Limited ("Investec") to accept signed instructions given by, or appearing to Investec to be given by us by facsimile or email for the operation of our bank Account(s) and/or the Account(s)s of those Companies/Firms or other Group Companies (the "instructions"). We hereby indemnify and hold harmless on demand Investec, its Directors, Officers and Employees in respect of any claims, costs, expenses, demands or suits made against or incurred by Investec by reason of Investec having accepted and acted upon the instructions. We further agree that Investec may recover under this Indemnity from our Account/any Account of any Group company whether by way of set off or otherwise.

We confirm and warrant that we have full authority to give this Indemnity on our behalf and on behalf of each of the Group companies and we understand the legal implications of signing this Indemnity and we confirm that we have either taken separate independent legal advice or have been offered the opportunity to do so and have declined to do so out of our own free will. We accept that if we choose not to include a unique word(s)/phrase that this may increase the risk of fraud on our Accounts.

We note below the following word(s)/phrase(s) unique to us which we may use in any communication to Investec at any time to assist Investec in verifying my/our identity. We confirm that the above authority to Investec and Indemnity in favour of Investec are not limited, cancelled or annulled in any way by the reliance or non-reliance by Investec on the said word(s)/phrase(s) being used in, or being omitted from, any communications we may make to Investec at any time. For the avoidance of doubt, we understand, agree and accept that Investec shall not be obligated to place absolute reliance on these word(s)/phrase(s) in establishing our identity and the veracity of our instructions and that Investec may, when acting in its discretion and for our intended benefit as far as reasonably possible, ignore the use of or the omission of the use of these word(s)/phrase(s) by us in any communication to Investec.

Unique word(s)/phrase(s) (*minimum 4, maximum 20 letters/spaces; please complete in Block Capitals*)

--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--	--

Print name Date

Director/Officer/Authorised signatory who has the power to bind the company

Print name Date

Director/Officer/Authorised signatory who has the power to bind the company

Important: failure to sign and return this indemnity means we cannot accept instructions from you by signed fax or email.

Section 7

Declaration and authorised signatories

7.1 Terms and Conditions

We hereby acknowledge receipt of and confirm that I/we have read, understood and agree to be bound by the terms of the Schedule of Charges, the General Terms and Conditions, the Sensitive Country and Sensitive Business Activity List, together with any applicable Special Terms and Conditions and/or Facility Letter (together referred to as "the Terms"), and as amended from time to time.

7.2 We declare that we have read and understood and agree to adhere to the requirements set out under Section 3 of this Master Trust and Corporate Service Provider General Application Form form being 'requirements for opening new designated Accounts', as amended from time to time.

7.3 Completion of this application form

We declare that the information provided in this application form and supporting documents is true and complete and confirm our understanding that Investec, in making its decision to open any Account or grant any Facility, will be relying on such information.

7.4 Binding agreement

We understand that Investec will only be bound by the Terms once we have completed, signed and returned the application form with all supporting documentation and Investec has completed its final checks and has agreed to open an Account for us or grant us a Facility.

We agree to notify Investec immediately if we become aware of any changes to the information provided in this Master Trust and Company Service Provider Application Form and Designated Account Application Form.

7.5 Security and provision of information

We must complete the Application form accurately to enable Investec to verify the identity of us. On the opening of an Account with Investec, we agree:

- to keep any information about the Account confidential and take every possible care to prevent unauthorised use
- that Investec will not be responsible for anyone else using the Account
- to tell Investec immediately if we think another person has the details of the Account
- to tell Investec immediately if we think another person has our password or any other security details
- not to use the same password for other security purposes
- that Investec can refuse to act solely on verbal instructions, and/or reverse transactions already made on those instructions
- to provide Investec with certified copies or originals of all documentation including resolutions which alters any constitutional or governing deeds or documents supplied to Investec with the Application promptly after the same is entered into
- to provide Investec with any additional information that it may require to conform with or anticipate any changes in the law, regulations, codes of practice or recommendations of the Guernsey Financial Services Commission or other relevant regulatory body
- to immediately inform Investec in writing of any changes to my/our contact details, authorised signature list, directors and shareholders' holdings (an interest of 25% or more).

7.6 We confirm our consent for Investec Bank (Channel Islands) Limited to disclose information and documentation already obtained by them concerning the Trust and Corporate Service Provider to other members of the Investec Group in order to assist in reaching a decision to accept Accounts controlled by the Trust and Corporate Service Provider and to consider the associated risks.

7.7 We confirm that we will provide you with copies of all the underlying Customer Due Diligence documentation for any Designated Account to be opened under our control.

7.8 Authorised signatories

We hereby request Investec to act on instructions received from the authorised signatories, using the signatures given below or on the attached original or originally certified authorised signatory list. These instructions remain valid until revoked by notice to Investec sent by us in writing. All previous specimen signature cards are hereby cancelled. We agree that such authority shall be binding on all and a good and sufficient discharge.

Specimen signatory conditions

Please detail specimen signatory conditions. If no box is ticked any one signatory alone will be able to carry out instructions, payment orders and make any other transactions or provide information.

Any one of us solely See attached original or originally certified signatory list All of us jointly

Corporate entity acting as authorised signatory (insert name)

Other (please specify)

Section 7

Declaration and authorised signatories

This declaration shall be governed by and construed in accordance with the laws of Guernsey. This is an important document and you should only sign it if you have read, understood and agree to be bound by the General Terms and Conditions and Special Terms and Conditions of any Account we may wish to open in the future including Section 3 of this application form. We undertake to make ourselves fully familiar with the Special Terms and Conditions of any such Account. The information provided on this form is true to the best of my/our knowledge and belief.

Application and declaration signed by at least two directors/officers/authorised signatories who have the capacity to bind the Company:

Date

Print name

Capacity

Signature

Date

Print name

Capacity

Signature

Additional signatories

If there are more than two authorised signatories please insert specimen signatures below or attach an authorised signatory list.

Specimen signature – Third named signatory

Print name

Official position

Specimen signature – Fourth named signatory

Print name

Official position

Section 8 Checklist

Please tick to confirm the following before sending your application:

- Have at least two directors/officers/authorised signatories who have the capacity to bind the Company signed the declaration on page 12.
- Have you enclosed an original or originally certified authorised signatory list or completed the specimen signatory conditions and arrangements on page 12?
- Have you enclosed certified copies of the documents requested in Section 2 'Controllers and owners'?
- If required, have you completed the fax/email indemnity on page 10?
- Have you provided the corporate documents for related entities within the structure? (Please note that further CDD on related entities may be requested).
- Have you provided an ownership structure chart?

Guidance notes for the purposes of International Tax Information Exchange

These guidance notes are intended to assist you in completing this application form. The tax regulations involved here are very complex and these guidance notes are not exhaustive. We strongly recommend you seek the assistance of a professional tax advisor when completing this application form.

The US government has introduced tax regulations aimed at combating tax evasion by US tax residents using foreign accounts (commonly known as the 'FATCA Regulations'). The Crown Dependencies of Guernsey, Jersey and the Isle of Man have entered into agreements with the US to enable FATCA to be implemented. You can find the Intergovernmental agreements between the Channel Islands and the US on the Treasury website at the following address, <https://www.treasury.gov/resource-center/tax-policy/treaties/pages/FATCA.aspx>.

From 1 January 2016 the OECD Common Reporting Standard (CRS) came into force which will see tax information exchange being implemented with an additional 53 countries known as the 'early adopters'. From January 2017 a number of additional countries will also adopt the Common Reporting Standard. You can find additional guidance in relation to CRS at the following address: <http://www.oecd.org/tax/automatic-exchange/>

The information in these Guidance Notes is correct as at 31 January 2017 but is subject to change, as and when tax regulations and/or guidance notes are updated.

Please tick the relevant FATCA **and** CRS classification for the entity. Your tax advisor can explain what these categories mean, and further information is available in the FATCA Guidance and the Crown Dependencies Guidance on the HMRC website or States of Guernsey website.

Within this form we have used the following categories:

FATCA

Registered deemed compliant FFI (Foreign Financial Institution)

Includes a sponsored investment entity, restricted funds, financial institutions with only a local client base, qualified investment vehicles and other forms of registered deemed compliant institution.

Participating FFI/Model 1 or 2 IGA FFI

Where the entity has been issued with its own Global Intermediary Identification Number ("GIIN").

Sponsored FFI

Where a Financial Institution (FI) has entered into a sponsoring agreement with another FI who will fulfil the sponsored entities reporting and due diligence requirements under the regime.

Sponsored investment entities

Please provide both the sponsored and sponsoring entities GIIN.

Certified deemed compliant FFI

Includes a sponsored closely held investment vehicle, FFI with only low value accounts, advisory only investment managers and advisors and any other entity included in Annex II of the relevant IGA.

Active NFFE

Active Non-Financial Foreign Entity such as an asset holding company where less than 50% of the entity's income is from Passive sources, such as investment income, rents and interest.

Passive NFFE

Passive Non-Financial Foreign Entity such as a property holding company where more than 50% of the entity's income is derived from passive sources such as rent from property.

Direct Reporting NFFE

Direct Reporting Non-Financial Foreign Entity which has chosen to register with the IRS in its own right in order to complete its own reporting in respect of FATCA and has been issued with a GIIN.

Non-participating FFI

Includes any entity that is not compliant under FATCA, is not registered with the IRS as an FFI or does not have an alternative FATCA compliant status such as a Trustee Documented Trust or Sponsored Closely Held Investment Vehicle. Please note if your entity is resident in a country that has entered into a Model 1 or Model 2 IGA with the United States there is no ability to classify the entity as a non-participating FFI. In addition Investec Bank (Channel Islands) Limited is unable to offer banking services to non-participating FFIs.

Exempt beneficial owner

Includes exempt retirement plans such as Sec 157A RATS and not for profit organisations such as registered charities.

Guidance notes for the purposes of International Tax Information Exchange

CRS

Reporting Financial Institution

The term "Financial Institution" means a "Custodial Institution", a "Depository Institution", an "Investment Entity", or a "Specified Insurance Company". Please see the relevant domestic guidance and the CRS for further classification definitions that apply to Financial Institutions.

Non-Reporting Financial Institution

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

- 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;
- 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;
- an Exempt Collective Investment Vehicle; or
- 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;
- any other defined in a countries domestic law as a Non-Reporting Financial Institution.

NFE

An NFE is any Entity that is not a Financial Institution.

Passive NFE

Under the CRS a "Passive NFE" means any:

- (i) NFE that is not an Active NFE; and
- (ii) Investment Entity located in a Non-Participating Jurisdiction and managed by another Financial Institution.

Active NFE

An NFE is an Active NFE if it meets any of the criteria listed below. In summary, those criteria refer to:

- active NFEs by reason of income and assets;
- Governmental Entities, International Organisations, Central Banks, or their wholly owned Entities;
- holding NFEs that are members of a nonfinancial group;
- start-up NFEs;
- NFEs that are liquidating or emerging from bankruptcy;
- treasury centres that are members of a nonfinancial group; or
- non-profit NFEs.

Active NFE Publicly Traded

Where its stock is regularly traded on an established securities exchange.

Guidance notes for the purposes of International Tax Information Exchange

For Passive NFFEs and NFEs only

Please note if the entity meets the definition to be treated as a Passive NFFE/NFE under the regulations, Investec will be responsible for reporting information about the controlling persons behind the account. We would therefore ask that you consider carefully if this method of reporting is appropriate or whether it would be better served by being a Direct Reporting NFFE (for FATCA) or treated as an FFI under the regulations, meaning that you would be responsible for reporting information relevant to your entity. Should your entity be classified as a Passive NFFE/NFE please indicate in section 2, your organisation's owners and controllers as well as their tax status. To assist you, we set out below who these people are likely to be, based on the different types of organisations we usually deal with.

If your organisation is a limited company (including a charitable company) we need information about:

- anyone who owns 25% or more of the company, or who has 25% or more of the voting rights in the company
- where the company is owned by another organisation, any individuals who are the ultimate beneficial owners of the company

If your organisation is a limited liability partnership (LLP), we need information about:

- anyone who owns 25% or more of the LLP or who has 25% or more of the voting rights in the LLP
- where the LLP is owned by another organisation, any individuals who are the ultimate beneficial owners of the LLP

If your organisation is a limited partnership, we need information about:

- anyone who owns 25% or more of the partnership
- where the partnership is owned by another organisation, any individuals who are the ultimate beneficial owners of the partnership
- the general partners

If your organisation is another type of corporate body, we need information about:

- anyone who owns 25% or more of the organisation
- where your organisation is owned by another organisation, any individuals who are the ultimate beneficial owners of your organisation.

Controlling Persons

Under CRS there is a specific requirement that, where an entity is determined to be a controlling person of a Passive NFE, the entity must be looked through in order to determine who the underlying individual controlling persons are. As per the Standard the term 'Controlling Persons' means the natural person(s) who exercise control over an entity. In the case of a trust such term means the settlor(s), the trustee(s), the protector(s), the beneficiary(ies) or classes of beneficiary(ies) and any other natural person(s) exercising ultimate, effective control over the trust. In the case of a legal arrangement other than a trust such term means persons in equivalent or similar positions. The term 'Controlling Persons' must be interpreted in a manner consistent with the Financial Action Task Force Recommendations.

Investec Bank (Channel Islands) Limited

Data Protection Notice

Investec Bank (Channel Islands) Limited (“we”, “us”, “our”) is committed to protecting the privacy and security of your personal data. We operate across the Channel Islands and also have a representative office in the Isle of Man. This Notice aims to give you information on how your personal data (i.e., information which directly or indirectly identifies you) are processed by us. For the purposes of the European data privacy laws (including the ‘General Data Protection Regulation’ (GDPR) and all legislation implementing GDPR equivalent provisions in the Bailiwick of Guernsey, Jersey and the Isle of Man (together, the **“Applicable Data Protection Laws”**), we are the Data Controller. This means that we are primarily responsible for making determinations about how and why we process your personal data.

Collecting your personal data

We may collect the following categories of personal data, including, without limitation:

- all personal data provided by you to us, such as:
 - name and contact details
 - nationality and national identity number(s)
 - identification documentation (including, for example, a copy of your passport)
 - tax status and tax identification number
 - employment history, income and source of wealth (for example properties that you own)
 - bank Account details and/or Account balance information including Account activity and history
- information (such as those categories of personal data described above) received from another person, for example, if a person applies for a joint Account with you, they may share your personal data with us or if you are a stakeholder in or manager of a business, and the business applies for products or services or enters into an agreement or interacts with us, we may obtain personal data about you to carry out checks against the business
- where permitted, information received from third parties acting on our behalf such as credit reference agencies, fraud prevention agencies and from other public sources (such as an electoral register)
- information about you that we may monitor and/or record from your telephone calls and electronic communications and electronic transactions
- information which we collect from you when you download our mobile app to access our services.

In limited cases, we may also collect “special categories” of data. Our money laundering, sanctions, financial crime and fraud prevention checks sometimes result in us obtaining information about actual or alleged criminal convictions and offences, as well as (for example) information relating to a person’s ethnicity, political opinions or religious beliefs. To the extent that we process such data, we will ensure that we have a lawful basis for processing. This may either be because we are required to comply with a legal obligation imposed by enactment or are otherwise authorised by law, in particular circumstances because the processing is justified as being in the public interest, or, in limited circumstances, because we have obtained your prior explicit consent. Where we have relied on your consent, you have a right to withdraw that consent at any time.

Investec Bank (Channel Islands) Limited

Data Protection Notice

How we will use your personal data

We will use your personal data for:

- i. the provision of products and/or services requested by you
- ii. managing your Accounts
- iii. making credit decisions (where applicable)
- iv. detecting and preventing financial crime such as fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions, on an ongoing basis (“**Regulatory Assessments**”)
- v. statistical analysis, market research and assessment
- vi. retaining your personal data processed as part of our Regulatory Assessments for future services entered into by you
- vii. to monitor and record calls and electronic communications for:
 - a. investigating, preventing, detecting and prosecuting financial crime
 - b. enforcing and defending our and our affiliates’ rights, either ourselves, or through third parties
 - c. quality, business analysis, training and related purposes
- viii. conducting direct marketing as described under heading ‘Marketing’ below
- ix. otherwise as necessary to comply with applicable laws, regulations or codes of practice.

The provision of personal data by you may be necessary in order for us, and other third parties to which personal data are disclosed, to comply with our legal and regulatory obligations or for the performance of any contractual relationship with you or, for any other purposes, where it is in our legitimate interests to process such information (such as those described under paragraphs (i) (to the extent not covered by contractual obligation), (iii), (v), (vi), (vii)(c) and (viii) above).

We do not intend to make any decisions about you based on automated processing of personal data.

How we will disclose your personal data

We may disclose certain personal data:

- to other affiliates in the Investec Group. Investec Group consists of Investec Bank plc (a company registered in the UK) and Investec Limited (a company registered in South Africa) and any of their direct or indirect subsidiaries and/or holding companies
- to our professional advisors, receivers and administrators (where applicable), and service providers (including, information technology systems providers)
- to courts, governmental and non-governmental regulators and ombudsmen
- to law enforcement agencies
- to relevant tax authorities
- to credit reference agencies who may use it to perform credit reporting and affordability checks for us and to verify your data, like identity (e.g. age and residence), and to prevent and detect criminal activity, fraud and money laundering
- to fraud prevention agencies, who will use it to prevent financial crime such as fraud and money-laundering and to verify your identity. If financial crime is detected, you could be refused certain services, finance or employment. Further details of how your information will be used by us and these fraud prevention agencies, and your data protection rights, can be viewed at: https://www.investec.com/en_gb/legal/UK/fraud-prevention-notice.html
- to any third party that acquires, or is interested in acquiring, all or part of our assets or shares, or that succeeds us in carrying on all or a part of its business, whether by merger, acquisition, reorganisation or otherwise
- as required or permitted by law
- to an introducer where you have been introduced to us (for example an independent financial adviser). We will inform the introducer of the outcome of the enquiry including whether we have agreed to provide you with the relevant product or service, (together, each of the bullet points above are referred to as “**Recipients**”).

Investec Bank (Channel Islands) Limited

Data Protection Notice

Transfer of personal data outside the European Economic Area (“EEA”), the Bailiwick of Guernsey and the Bailiwick of Jersey

We may transfer your personal data to the Recipients (including affiliates in the Investec Group) located in countries outside of the Bailiwick of Guernsey, Jersey and the Isle of Man (each of whom are subject to an adequacy decision) or the EEA which may not have data privacy laws equivalent to those in the EEA. In those instances, we will take all necessary steps to protect your personal data in accordance with Applicable Data Protection Laws. For more information about how we transfer personal data, please contact our Data Protection Officer, whose details are described below under the heading ‘Enquiries, Requests or Concerns’.

Your rights

Under Applicable Data Protection Laws, you may have a right (in certain circumstances):

- to request access to and rectification or erasure of your personal data
- to restrict or to object to the processing of your personal data
- to data portability (i.e. to request the transfer of personal data from one data controller to another in certain circumstances).

If you wish to exercise any of these rights you should contact our Data Protection Officer, whose details are described below under the heading ‘Enquiries, Requests or Concerns’.

You also have the right to lodge a complaint about the processing of your personal data with your local data protection authority if you consider that the processing of your personal data carried out by us or our affiliates, infringes Applicable Data Protection Laws. The relevant data protection authorities in the Channel Islands and the Isle of Man are set out below:

The Office of the Data Protection Authority in Guernsey: Web: <https://odpa.gg>

The Office of the Information Commissioner in Jersey: Web: <https://www.oicjersey.org>

The Information Commissioner in the Isle of Man: Web: <https://www.inforights.im/>

Marketing

We may contact you periodically to provide information regarding events, products, services and content that may be of interest to you and to invite you to participate in market research. If Applicable Data Protection Laws requires that we receive your consent before we send you certain types of marketing communications, we will only send you those types of communications after receiving your consent.

If you wish to stop receiving marketing or market research communications from us, you can click on the unsubscribe link in the marketing communication or contact the Data Protection Officer as described below.

Security and data retention

We will take steps to protect your personal data against loss or theft, as well as from unauthorised access, disclosure, copying, use or modification, regardless of the format in which it is held. Subject at all times to applicable laws, we will retain your personal data for a minimum period of 10 years from the end of our relationship with you.

Changes to this Data Protection Notice

We may revise or supplement our Data Protection Notice from time to time to reflect for example, any changes in our business, law, markets, and the introduction of any new technology. We will publish the updated Data Protection Notice on our website at

<https://www.investec.com/ibci-dataprotection> and is available on request.

Enquiries, requests or concerns

All enquiries, requests or concerns regarding this Notice or relating to the processing of personal data, should be sent to the Data Protection Officer at Investec Bank (Channel Islands) Limited, Gategny Court, Gategny Esplanade, St Peter Port, Guernsey, GY1 3LP, Channel Islands or by email to dataprotection@investec-ci.com

This Notice was last updated on 2 September 2019.

Investec Bank (Channel Islands) Limited

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Website: www.investec-ci.com

Investec Bank (Channel Islands) Limited, Jersey Branch,
registered address:

One The Esplanade, St Helier, Jersey, JE2 3QA

Investec Bank (Channel Islands) Limited, Isle of Man Representative Office
place of business address:

Second Floor, The Old Courthouse, Athol Street, Douglas, Isle of Man, IM1 1LD

Banking | Lending

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