

Tax self-certification form – corporate entities

Tax regulations (note 1) require us to collect certain information about each investor's tax residency and tax classifications. In certain circumstances (including if we do not receive a valid self-certification from you) we may be obliged to share information about your account(s) with the relevant tax authorities. If you have any questions about your organisation's classifications in the form below, please contact your tax adviser. **Please see explanatory notes for key definitions.** Should any information provided change in the future, please make sure that you advise us promptly.

Sections 1 to 4 must be completed

If your organisation has more than one country of tax residency, please complete one self-certification form for each country

Section 1: Tax residency information

- 1.1 Please state the country in which your organisation is resident for tax purposes _____
- 1.2 Please provide us with your organisation's tax identification/reference number _____
- 1.3 If the organisation is **not** a specified person (note 1a) in the country stated in 1.1 above, please tick this box

Please tick only one box with reference to the tax residency stated in box 1.1

Section 2a: Organisation's classification under FATCA (note 2)

If your organisation is a financial institution (note 5), please tell us which type:

- | | | | |
|--|--------------------------|--|--------------------------|
| 2.1 UK financial institution (note 5) or a partner jurisdiction financial institution (note 6) | <input type="checkbox"/> | 2.4 Financial institution resident in the USA or in a US territory (note 9) | <input type="checkbox"/> |
| 2.2 Participating foreign financial institution (in a non-IGA jurisdiction (note 7)) | <input type="checkbox"/> | 2.5 Exempt beneficial owner (note 10) | <input type="checkbox"/> |
| 2.3 Non-participating foreign financial institution (note 8), in a non-IGA jurisdiction (note 7) | <input type="checkbox"/> | 2.6 Deemed compliant foreign financial institution (note 11), besides those listed above | <input type="checkbox"/> |

If your organisation is not a financial institution (note 5), please tell us the entity's FATCA status below:

- | | | | |
|---|--------------------------|--|--------------------------|
| 2.7 Active non-financial foreign entity (note 12) | <input type="checkbox"/> | 2.8 Passive non-financial foreign entity (note 13)
<i>(If you tick this box, please include individual self-certification forms for each of your controlling persons, note 4)</i> | <input type="checkbox"/> |
|---|--------------------------|--|--------------------------|

Complete this only if your organisation is US tax resident (box 1.1)

Section 2b

- Tick this box if your organisation is any of the following and therefore **not** a specified US person (note 16)
- A regularly traded corporation on a recognised stock exchange.
 - Any corporation that is a member of the same expanded affiliated group as a regularly traded corporation on a recognised stock exchange.
 - A government entity.
 - Any bank as defined in section 581 of the U.S. Internal Revenue code.
 - A retirement plan under section 7701(a)(37), or exempt organisation under section 501(a) of the U.S. Internal Revenue code.
 - Or any other exclusion listed in explanatory note 16.

Please tick only one box in this section with reference to the tax residency stated in box 1.1

Section 3: Organisation's classification under the common reporting standard (CRS), note 2

3.1 Financial institution (this includes non-reporting financial institutions such as a pension scheme, government entity, international organisation and other entities listed in explanatory notes 17 and 18).

3.2 A professionally managed investment entity (note 23) outside of a CRS participating jurisdiction, (note 24).

(If this box is ticked, please include individual self-certification forms for each of your controlling person, note 4).

3.3 Active non-financial entity (note 20) which is regularly traded on an established securities market or affiliated thereto, a Governmental entity or an international organisation.

3.4 Active non-financial entity, other than those listed in 3.3 above. (note 20)

3.5 Passive non-financial entity (note 21).

(If you tick this box, please include individual self-certification forms for each of your controlling persons, note 4).

Section 4: Declaration for FATCA and CRS (note 2)

I declare that the information provided on this form is, to the best of my knowledge and belief, accurate and complete.

I agree to notify Rathbone Unit Trust Management Limited immediately in the event the information in the self-certification changes (including any changes to controlling persons).

Signed by (please print name) _____

On behalf of (organisation name) _____

Position (in organisation) _____

Country of incorporation or organisation _____

Signature of person authorised to sign _____

Date _____

Explanatory notes

The following explanatory notes are based on tax regulations as implemented in the UK. If you have any questions about your organisation's classification, please contact your tax adviser.

Definitions common to Foreign Account Tax Compliance Act (FATCA) and the OECD Common Reporting Standard of Financial Account Information (CRS)

Note 1 – Tax regulations

The term "tax regulations" refers to regulations created to enable automatic exchange of information and include FATCA and the CRS for automatic exchange of Financial Account Information (note 2).

Note 1a – Specified person

The term "specified person" is defined by reference to local laws in the country where an entity is established. In the UK, a "specified United Kingdom person" means a person or entity who is resident in the United Kingdom for tax purposes, 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 related entity (note 11) of a corporation described in clause (i);
- (iii) a Depository institution;
- (iv) a broker or dealer in securities, commodities, or derivative financial instruments (including notional principle contracts, futures, forwards, and options) that is registered as such under the laws of the United Kingdom;
- (v) a Governmental entity;
- (vi) an international organisation (examples of which include The International Monetary Fund, The World Bank, The International Bank for Reconstruction and Development and The European Community – for a full list please see the relevant guidance issued by HMRC, or the IRS);
- (vii) a central bank; or
- (viii) a pension scheme or other arrangement registered with HMRC under part 4 of the Finance Act 2004.

Similar definitions apply to entities in the US (defined in the FATCA regulations) and crown dependencies and overseas territories (as defined in the relevant agreement to improve international tax compliance with the UK). Entities in other jurisdictions should instead apply the similar definition of "reportable person" under the CRS (note 16).

Note 2 – FATCA and CRS

FATCA

FATCA regulations in sections 1471 to 1474 of the US Internal Revenue code and the Treasury regulations and official guidance issued there under, as amended from time to time. FATCA regulations have been adopted in the UK by The International Tax Compliance Regulations 2015.

CRS

The OECD Common Reporting Standard (CRS) which has been adopted in the UK by The International Tax Compliance Regulations 2015.

Note 3 – Non-profit organisation

An entity that meets **ALL** of the following criteria:

- (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 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 organisation, or escheat to the government of the entity's country of residence or any political subdivision thereof.

Note 4 – Controlling persons

The term "controlling persons" means the natural persons who exercise 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" must be interpreted in a manner consistent with the Financial Action Task Force recommendations.

"Control" over an entity is generally exercised by the natural person(s) who ultimately has a controlling ownership interest in the entity. A "control ownership interest" depends on the ownership structure of the legal person and is usually identified on the basis of a threshold applying a risk-based approach (e.g. any person(s) owning more than a certain percentage of the legal person, such as 25 percent). Where no natural person(s) exercises control through ownership interests, the controlling person(s) of the entity will be the natural person(s) who exercises control of the entity through other means. Where no natural person(s) is identified as exercising control of the entity, the controlling person(s) of the entity will be the natural person(s) who holds the position of senior managing official.

Classifications under FATCA

Note 5 – Financial institution

The term "financial institution" means a custodial institution, a depository institution, an investment entity, or a specified insurance company as defined for the purposes of FATCA (note 2). Please see the relevant tax regulations for the classification definitions that apply to financial institutions.

Note 6 – Partner jurisdiction financial institution

A partner jurisdiction financial institution includes (a) any financial institution resident in the UK, but excluding any branches of such financial institution that are located outside the UK and (b) any UK branch of a financial institution not resident in the UK. For these purposes, "partner jurisdiction" means any jurisdiction that has in effect an agreement with the US to facilitate the implementation of FATCA.

Note 7 – Non-IGA jurisdiction

A non-IGA jurisdiction is one where there is no Model 1 or 2 intergovernmental agreement in place with the US in respect of FATCA (note 2).

Note 8 – Participating foreign financial institution (NPFFI)

The term "non-participating foreign financial institution" means a non-participating FFI, as that term is defined in relevant US Treasury regulations, but does not include a United Kingdom financial institution or other partner jurisdiction financial institution other than a financial institution identified as a non-participating financial institution pursuant to a determination by IRS or HMRC that there is significant non-compliance with FATCA obligations.

Note 9 – US territory

This term means American Samoa, the Commonwealth of the Northern Mariana Islands, Guam, the Commonwealth of Puerto Rico or the US Virgin Islands.

Note 10 – Exempt beneficial owner

The term "exempt beneficial owner" means

- (i) a UK Governmental organisation;
- (ii) an international organisation (examples of which include The International Monetary Fund, The World Bank, The International Bank for Reconstruction and Development and The European Community - for a full list please see the relevant guidance issued by HMRC, or the IRS);
- (iii) a central bank; or
- (iv) a UK registered pension scheme, or non-UK pension scheme falling within the definition of exempt beneficial owner for the purpose of FATCA.

Explanatory notes (continued)

Note 11 – deemed compliant foreign financial institution

The term “deemed compliant foreign financial institution” means:

- (i) Those entities classified as such in annex II of the UK IGA, which includes non-profit organisations (note 3) and financial institutions (note 5) with a local client base; or
- (ii) Entities which otherwise qualify as such under the FATCA regulations.

Note 12 – Active non-financial foreign entity (NFFE)

An active NFFE is any non-financial foreign entity (note 14) that meets one 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 (note 15) of an entity the stock of which is traded on an established securities market;
- (c) The NFFE is organised in a US territory and all of the owners of the payee are bona fide residents of that U.S. Territory;
- (d) The NFFE is a non-US government, a government of a US territory, an international organisation, a non-US 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. In these circumstances, the entity will be a passive NFFE (note 13);
- (f) The NFFE is not yet operating a business and has no prior operating history, but is investing capital into assets with the intent to operate a business other than that of a financial institution; provided, that the NFFE shall not qualify for this exception after the date that is 24 months after the date of the initial organisation of the NFFE;
- (g) The NFFE was not a financial institution in the past five years, and is in the process of liquidating its assets or is reorganising with the intent to continue or recommence operations in a business other than that of a financial institution;
- (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 (note 15) provided that the group of any such related entities is primarily engaged in a business other than that of a financial institution;
- (i) The entity is a non-profit organisation (note 3); or
- (j) The NFFE is an “excepted NFFE” as described in relevant US Treasury regulations.

Note 13 – Passive non-financial foreign entity (PNFFE)

A passive NFFE is any non-financial foreign entity (note 14) that is not an active NFFE (note 12).

Note 14 – Non-financial foreign entity (NFFE)

The term “NFFE” means any non-US entity that is not treated as a financial institution (note 5).

Note 15 – 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 director in direct ownership of more than 50 percent of the vote or value in an entity.

Note 16 – Specified US person

The term “specified US person” means a US 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 US 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 US 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 organisation exempt from taxation under section 501(a) or an individual retirement plan as defined in section 7701(a)(37) of the US Internal Revenue code;
- (vi) any bank as defined in section 581 of the US Internal Revenue code;
- (vii) any real estate investment trust as defined in section 856 of the US Internal Revenue code;
- (viii) any regulated investment company as defined in section 851 of the US Internal Revenue code or any entity registered with the Securities Exchange Commission under the Investment Company Act of 1940 (15 USC. 80a-64);
- (ix) any common trust fund as defined in section 584(a) of the US Internal Revenue code;
- (x) any trust that is exempt from tax under section 664(c) of the US Internal Revenue code or that is described in section 4947(a)(1) of the US 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; or
- (xii) a broker as defined in section 6045(c) of the US Internal Revenue code.

Classifications under CRS

Note 17 – Financial institution

The term “financial institution” means a custodial institution, a depository institution, an investment entity (note 23), or a specified insurance company.

Note 18 – Non-reporting financial institution

The term “non-reporting financial institution” means any financial institution which is:

- (a) a Governmental entity, international organisation or central bank, other than with respect to a payment that is derived from an obligation held in connection with a commercial financial activity of a type engaged in by a specified insurance company, custodial institution, or depository institution;
- (b) a broad participation retirement fund; a narrow participation retirement fund; a pension fund of a Governmental entity, international organisation or central bank; or a qualified credit card issuer;
- (c) any other entity that presents a low risk of being used to evade tax, has substantially similar characteristics to any of the entities described in (a) or (b) above, and is included in the list of non-reporting financial institutions provided to the European Commission by the UK;
- (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 1 with respect to all reportable accounts of the trust.

Note 19 – Related entity

An entity is a "related entity" of another entity if (i) either entity controls the other entity; (ii) the two entities are under common control; or (iii) the two entities are investment entities, 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 percent of the vote and value in an entity.

Note 20 – Active non-financial entity (NFE)

The term "active NFE" means any NFE (note 22) that meets any of the following criteria:

- (a) less than 50 percent of the NFE'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 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 (note 19) 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. In these circumstances, the entity will be a passive NFE (note 21);
- (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 entity is a non-profit organisation (note 3).

Note 21 – Passive non-financial entity (PNFE)

A passive NFE is any non-financial entity (note 22) that is not an active NFE, or an investment entity (note 23) that is not a participating jurisdiction (note 24) financial institution.

Note 22 – Non-financial entity (NFE)

The term "NFE" means any entity that is not a financial institution (note 17).

Note 23 – Investment entity

The term "investment entity" means any entity:

- (a) which 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 subparagraph A(6)(a) of the EU Directive on Administrative Co-operation 2014/107/EU.

An entity is treated as primarily conducting as a business one or more of the activities described in subparagraph A(6)(a), or an entity's gross income is primarily attributable to investing, reinvesting, or trading in financial assets for the purposes of subparagraph A(6)(b), if the entity's gross income attributable to the relevant activities equals or exceeds 50 percent 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 because that entity meets any of the criteria in subparagraphs D(8)(d) through (g) of the EU Directive on Administrative Co-operation 2014/107/EU.

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.

Note 24 – Participating jurisdiction

The term "participating jurisdiction" means a jurisdiction which has an agreement in place to exchange information in accordance with the CRS.