

簡介

金融帳戶資訊自動交換 (AEOI) 制度是基於共同申報準則 (CRS) 而建立，共同申報準則是經濟合作暨發展組織 (OECD) 為了打擊逃稅所擬定的國際公認準則。渣打集團及其子公司與關係企業「渣打銀行」必須向客戶收集特定資訊和 / 或文件，以確認其稅籍和類型。在特定狀況下，渣打銀行可能依規定每年向相關稅務單位或主管機關申報此資訊。根據適用法律，此資訊可能交換或報告給其他國家或司法管轄區的相關稅務機關。

共同申報準則 (CRS) 自我證明表格不是用來協助您理解共同申報準則 (CRS) 中金融帳戶資訊自動交換 (AEOI) 規定的。本銀行無法亦也不會提供稅務與法律的建議。如果您對於此自我證明或共同申報準則 (CRS) 規定的金融帳戶資訊自動交換 (AEOI) 有任何問題，請洽詢您的稅務、法律或其他專業顧問。

如您為實體帳戶持有人，請完成此自我認證。如為聯名帳戶或多位帳戶持有人，需請每位實體帳戶持有人分別完成獨立的自我認證。

如您為個人（包括獨資經營者）帳戶持有人，請勿使用此自我認證，並請改完成「自我認證-個人認證」。

請用正體字填寫第 1 到第 4 部分，並閱讀第 5 頁如何完成自我證明表格的指引與閱讀第 11 頁的定義。

請注意，所有欄位皆為必填，除非欄位中有星號（*）。

第 1 部分 實體帳戶身分

A) 實體或分支機構名稱:	B) 公司或組織所屬國家/司法管轄區：
C) 現行營運或註冊地址 **	D) 通訊 / 郵寄地址（僅 在與 C 節不同時填寫）
地址列 1：	地址列 1：
地址列 2：	地址列 2：
市/鎮：	市/鎮：
省/州/縣：	省/州/縣：
郵政編號/郵遞區號：	郵政編號/郵遞區號：
國家/司法管轄區：	國家/司法管轄區：

**** 填入目前實體的營運或註冊地址**

第 2 部分 稅籍資訊

請填寫下表，說明實體因稅務目的之營運/註冊地址與實體具有該等國家或司法管轄區的稅籍編號或具相同功能之辨識碼（以下簡稱稅籍編號「TIN」）。如果帳戶持有人擁有超過三個國家或司法管轄區之稅籍，請再使用另一份表格填寫。如果未提供稅籍編號，請註明適當原因 A、B 或 C：

- **原因 A：**國家或司法管轄區未核發稅籍編號 (TIN)。
- **原因 B：**國家或司法管轄區有核發稅籍編號 (TIN)，但是帳戶持有人無法或無須取得稅籍編號 (TIN) (請說明帳戶持有人無法或無須取得稅籍編號 (TIN) 的原因)。
- **原因 C：**無須提供稅籍編號 (TIN)。國家或司法管轄區已核發稅籍編號 (TIN)，但該國家或司法管轄區未要求金融機構蒐集居住者稅籍編號 (TIN)。

請參閱本自我證明表格之指引，以瞭解更多詳細資訊。

編號	擁有稅籍之國家 / 地區	稅籍編號 (TIN)	如果未提供稅籍編號或相同功能的辨識碼，請註明適當原因 A、B 或 C：
1			
2			
3			

如果選擇上述理由 B，請在以下相對應列說明帳戶持有人無法或無須取得稅籍編號 (TIN) 的原因

1	
2	
3	

第 3 部分 實體類型

請於 1A 到 1H 勾選一項適用之實體類別。

金融機構實體 (FI)

☐ **1A) 位於非共同申報準則 (CRS) 參與之司法管轄區並由另一個金融機構管理的投資實體**

(如果勾選此項，請填寫以下「實體 - 具控制權之人」部分)

☐ **1B) 其他金融機構**

積極非金融機構實體 (NFE)

☐ **1C) 積極非金融機構實體 (Active NFE) - 股票於經認可證券市場交易之公司或其關係實體**

☐ 帳戶持有人是公司，其發行之股票經常在 _____ (經認可證券市場) 交易。

☐ 帳戶持有人是 _____ 公司之關係實體，且前述公司之股票經常 _____ (經認可證券市場) 交易。

☐ **1D) 積極非金融機構實體 (Active NFE) – 政府實體**

☐ **1E) 積極非金融機構實體 (Active NFE) – 中央銀行**

☐ **1F) 積極非金融機構實體 (Active NFE) – 國際組織**

☐ **1G) 非上述之積極非金融機構實體 (Active NFE) (非 1C 至 1F 之 Active NFE)**。例如，實質營運企業、清算中的公司、非金融集團成員之控股公司、非金融集團之財務公司、新創公司或慈善機構或非營利組織。(請參考定義內容)

其他非金融機構實體

☐ **1H) 消極非金融機構實體 (Passive NFE)**

(如果勾選此項，請填寫以下「實體 - 具控制權之人」部分)

您以上勾選 1A 或 1H 選項時才須填寫：

「實體 - 具控制權之人」

2A) 請填寫帳戶持有人每位具控制權之人的姓名：

2B) 請每位具控制權之人完成自我證明表格 - 實體附錄。

附註：如對本實體行使控制權並非自然人，則具控制權之人為該實體擔任高階管理職務之人。

第 4 部分 聲明與簽署

本人理解本人所提供與自我證明表格有關的資訊均受渣打集團及其子公司、關係企業與本人間開戶總約定書及其他帳戶或交易相關契約條款的拘束。

本人確知此自我證明表格所包含之資訊以及有關帳戶持有人與應申報帳戶之資訊可能提供予帳戶所在地國家或司法管轄區之稅務單位或主管機關，該稅務機關亦可能依據該國或該司法管轄區與帳戶持有人擁有稅籍的國家或司法管轄區所簽訂之雙邊或多邊稅務協定，進行金融帳戶資訊交換。

本人確認本人係經與此自我證明表格有關的所有帳戶持有人授權完成並簽署本自我證明表格。

本人聲明，就本人所知所信，此聲明的全部陳述均屬正確且完備。

本人同意帳戶持有人的稅籍狀態改變或導致本自我證明表格內容資訊為不正確的情況發生時（包含第 3 部分第 2 題具控制權之人相關資訊變動，如果適用）30 日內，通知渣打銀行，並在發生此變化後 30 日內，並提交一份已適當更新的自我證明和聲明，並就渣打銀行與 / 或相關法規可能之要求提供額外資訊。

Sign Here



.....
帳戶持有人（或帳戶持有人授權代為簽署的個人）簽名

.....
正楷全名

.....
日期（日 - 月 - 西元年）

.....
帳戶持有人授權代為簽署之人的身分

.....
公司章 *

* 若該公司在中國開立或持有金融帳戶，帳戶持有人必須於此共同申報準則 (CRS) 自我證明表格，加蓋帳戶持有人的公司章或印章（若帳戶持有人非中國註冊公司，且沒有公司章或印章，則無須加蓋），並提交共同申報準則 (CRS) 自我證明表格正本。

請注意您若提供錯誤、誤導性或不正確的聲明可能被視為犯罪行為，依據相關法律或法規，您可能因此受罰。

CRS Self-Certification – Entity

Instructions

The general instructions below are intended to assist you with the completion of this Self-Certification. This should be read with the **Definitions**, as well as the relevant CRS regulations, and related documents. Should you have any questions, please contact your tax, legal, and/or other professional advisor.

Part 1 Identification of Entity

- A) Name of Account Holder* (Legal Entity or Branch):** Provide the full name of the Account Holder. If it is a branch of a Financial Institution, provide the full name of the head office. This is a mandatory field.
- B) Country/Jurisdiction of Incorporation or Organisation:** If the Entity is a corporation. If the Entity is another type of entity, enter the country under whose laws it is created, organised, or governed. This is a mandatory field.
- C) Current Residence Address:** Enter the Entity's current residence address. This is a mandatory field.
- D) Mailing Address:** Enter the Entity mailing address only if it is different from the Current Residence Address.

*Please refer to the **Definitions** provided in this Self-Certification for an explanation of an Entity.

Part 2 Tax Residence Information

Please complete the table indicating (i) the country(ies)/jurisdiction(s) where the Entity is/are Resident for tax purposes and (ii) the Entity's TIN for each country/jurisdiction indicated. Please refer to the **Definitions** provided in this Self-Certification for an explanation on "Resident for tax purposes".

If the Entity is not resident for tax purposes in any jurisdiction, for example, it is fiscally transparent, please indicate that in the first column of the table and provide its place of effective management or country in which its principal office is located.

The requirement to pay tax in a particular country/jurisdiction does not necessarily signify tax residence in that country/jurisdiction; it is possible to have to pay tax in a country/jurisdiction in which one is not tax resident, and not to have to pay tax in a country in which one is tax resident. Whether a person is tax resident in a particular country/jurisdiction depends on whether that person meets the definition of a tax resident under the tax laws of that country/jurisdiction.

For more information on tax residence, please consult your tax advisor or refer to the information at OECD automatic exchange of information portal at <https://www.oecd.org/en/networks/global-forum-tax-transparency/resources/aeoi-implementation-portal/tax-residency.html>

If a TIN is unavailable, please indicate only one of the following reasons:

- Reason (A): Country/Jurisdiction does not issue TINs.
- Reason (B): Country/Jurisdiction issues TINs and requires Financial Institutions to collect TINs, but the Entity is unable or not required to obtain a TIN. Please provide an explanation as to why the Entity is unable or not required to obtain a TIN in the table.
- Reason (C): No TIN is required. Country/Jurisdiction issues TINs but the country/jurisdiction does not require Financial Institutions to collect TINs from its residents.

This is a mandatory field.

Part 3 Entity Type

General: Only tick one box from 1A to 1H to provide the Entity's status. Please refer to the **Definitions** in providing the Entity's status.

Financial Institution: If the Entity is a Financial Institution, check the one box that applies. By checking a box, the entity is representing that it qualifies for the status indicated.

Entity that is Active Non-Financial Entity (Active NFE) or Other Non-Financial Entity: If the Entity is not a Financial Institution, check the one box that applies. By checking a box, the entity is representing that it qualifies for the status indicated.

Controlling Person of Entity: If box 1A or 1H was ticked, this section needs to be completed with the name of each Controlling Person. Additionally, an Entity Annex needs to be completed for each Controlling Person.

Part 4 Declaration and Signature

Declaration and Signature: The Self-Certification must be signed and dated by the Entity that is the Account Holder. If the Self-Certification Form is completed by an Individual authorised to sign for the Account Holder, please indicate the capacity in which the Individual is signing the Self-Certification. By signing the Self-Certification, the authorised representative, officer, or agent of the entity also agrees to provide a new Self-Certification and Declaration within 30 days following a change in circumstances affecting the correctness of the Self-Certification. This is a mandatory field.

For Account Holders incorporated in China and maintaining a Financial Account in China, the CRS Self-Certification must be marked with the Entity's stamp or chop and the original CRS Self-Certification must be submitted. Entities incorporated in China and foreign-incorporated entities maintaining a Financial Account in China must submit the original CRS Self-Certification.

Capacity: An authorised representative must state the capacity in which he/she is signing on behalf of the Account Holder. If this Self-Certification is completed by an agent acting under a duly authorised power of attorney, the Self-Certification must be accompanied by the power of attorney in proper form specifically authorising the agent to represent the Account Holder in making, executing, and presenting the Self-Certification. This is a mandatory field.

共同申報準則 (CRS) 自我證明表格 – 實體附件

每位具控制權之人均應完成本部分之填寫。每位具控制權之人請分別填寫一份實體附件。請使用正楷字填寫第 1 至第 5 部分。

第 1 部分 具控制權之人身分

A) 個人帳戶持有人姓名	B) 出生日期
稱謂：	日-月-西元年：
姓氏：	C) 出生地
名字：	出生鄉鎮或城市：
中間名：	出生國家 / 司法管轄區：
D) 現行居住地址	E) 通訊 / 郵寄地址 (僅 在與 D 節不同時填寫)
地址列 1：	地址列 1：
地址列 2：	地址列 2：
市/鎮：	市/鎮：
省/州/縣：	省/州/縣：
郵政編號/郵遞區號：	郵政編號/郵遞區號：
國家/司法管轄區：	國家/司法管轄區：
F) 性別*	G) 公民身分的國家或司法管轄區*
☐ 男性	
☐ 女性	H) 身分證號碼*
☐ 其他	
*如果帳戶持有人是在印度持有金融帳戶，才須填寫欄位 F、G 和 H。 * G 欄：若涉及多個國家或司法管轄區，所有公民身份必須列出。	

共同申報準則 (CRS) 自我證明表格 – 實體附件

第 2 部分 稅籍資訊

請完成以下表格，說明 (i) 帳戶持有人擁有稅籍的國家 / 司法管轄區；和 (ii) 帳戶持有人具有該等國家 / 司法管轄區的稅籍編號或相同功能的編號（以下稱為「稅籍編號 (TIN)」）。如果帳戶持有人在三個以上國家或司法管轄區擁有稅籍，請再使用另一份表格填寫。請包括擁有稅籍之所有國家 / 司法管轄區，無論該國家 / 司法管轄區是否採用共同申報準則 (CRS)。

如果未提供稅籍編號或相同功能的辨識碼，請註明適當原因 A、B 或 C：

- 原因 A：國家或司法管轄區未核發稅籍編號 (TIN)。
- 原因 B：國家或司法管轄區有核發稅籍編號 (TIN)，但是帳戶持有人無法或無須取得稅籍編號 (TIN)（請說明帳戶持有人無法或無須取得稅籍編號 (TIN) 的原因）。
- 原因 C：無須提供稅籍編號 (TIN)。國家或司法管轄區已核發稅籍編號 (TIN)，但該國家或司法管轄區未要求金融機構蒐集居住者稅籍編號 (TIN)。

請參閱本自我證明表格之指引，以瞭解更多詳細資訊。

編號	擁有稅籍之國家 / 地區	稅籍編號 (TIN)	如果未提供稅籍編號或相同功能的辨識碼，請註明適當原因 A、B 或 C：
1			
2			
3			

如果選擇上述理由 B，請在以下相對應列說明帳戶持有人無法或無須取得稅籍編號 (TIN) 的原因

1	
2	
3	

第 3 部分 公民/居留身份投資資訊

許多國家/司法管轄區有提供投資入籍 (CBI) 和投資居留 (RBI) 的計劃，允許外國人根據當地投資或支付固定費用獲得公民身份或臨時/永久居留權。

請參閱以下連結所列出的 CBI/RBI 國家/司法管轄區資訊 (有關更多詳細資訊，請參閱 OECD 組織網站：

<https://www.oecd.org/en/topics/sub-issues/international-standards-on-tax-transparency/residence-citizenship-by-investment.html>).

安地卡及巴布達	多米尼克	塞席爾	巴哈馬	格瑞那達
特克斯和凱科斯群島	巴林	巴拿馬	阿拉伯聯合大公國	巴拿馬
聖克里斯多福及尼維斯	巴貝多	賽普勒斯	聖露西亞	

i. 上述 OECD CBI/RBI 清單中，所有個人稅務居留國/司法管轄區 (第 2 部分稅務居留資訊) 是否都包含在內？

- ☐ 否 (若勾選「否」，請進入第 4 部分聲明與簽署)
- ☐ 是 (若勾選「是」，請繼續完成下方第 ii 至 v 題 (如適用為 vi))

ii. 您是否根據 CBI/RBI 計畫取得居留權？

- ☐ 是 ☐ 否

iii. 您是否擁有其他國家或司法管轄區的居留權？

- ☐ 是 ☐ 否

iv. 您在過去一年內是否在任何其他國家或司法管轄區停留超過 90 天？

- ☐ 是 ☐ 否

v. 您在過去一年內是否在其他國家或司法管轄區申報過個人所得稅申報表？

- ☐ 是 ☐ 否

vi. 以上 iii 至 v 問題任一有勾選「是」，請將具有以上國家或司法管轄區的資訊放入第 2 部分實體控制權人稅籍資料中。否則，請在下方解釋(問題 iii, iv or v)中的狀況，為何不應將其視為第 2 部分-個人具有該國家或司法管轄區稅籍資訊：

國家或司法管轄區	問題 (iii, iv or v)	不考量為具有該等國家或司法管轄區的稅籍之原因

第 4 部分 具控制權之人類型

請勾選具控制權之人就其成為實體的具控制權之人適當類型。填寫第 4 部分可參考指引之說明。

實體之具控制權之人(僅選擇一個角色。若有多個角色適用，請選擇下方列表中最高位的相關職位)

☐	透過所有權控制
☐	透過其他方式對該實體行使控制權者
☐	高階管理人員

信託的具控制具控制權之人(請選擇所有適用的選項)

☐	委託人
☐	受託人
☐	信託監察人
☐	受益人
☐	其他

其他法律安排（信託除外）的具控制權之人(請選擇所有適用的選項)

☐	具相當或類似委託人地位之人
☐	具相當或類似受託人地位之人
☐	具相當或類似信託監察人地位之人
☐	具相當或類似受益人地位之人
☐	其他相當或類似地位之人

第 5 部份 聲明與簽署

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本人確認本人係經與此自我證明表格有關的所有帳戶持有人授權完成並簽署本自我證明表格。

本人聲明，就本人所知所信，此聲明的全部陳述均屬正確且完備。

本人同意帳戶持有人的稅籍狀態改變或導致本自我證明表格內容資訊為不正確的情況發生時（包含第 3 部分第 2 題具控制 權之人相關資訊變動，如果適用）30 日內，通知渣打銀行，並在發生此變化後 30 日內，並提交一份已適當更新的自我證明 和聲明，並就渣打銀行與 / 或相關法規可能之要求提供額外資訊。

Sign Here



.....
具控制權之人、帳戶持有人簽名（具控制權之人授權之個人簽名）

.....
正楷全名

.....
日期（日 - 月 - 西元年）

.....
具控制權之人授權之個人簽署身分

注意：如果您是具控制權之人簽署的個人，則必須說明您簽署表格的身份。若此自我認證由代理人依合法授權書完成，則表格必須附上適當格式的授權書，明確授權代理人代表控制者製作、執行及呈現自我認證。

請注意您若提供錯誤、誤導性或不正確的聲明可能被視為犯罪行為，依據相關法律或法規，您可能因此受罰。

CRS Self-Certification – Entity Annex

Instructions

This section is to be completed for each Controlling Person. Use a separate Entity Annex for each Controlling Person. Please refer to the Instructions for the main Self-Certification where applicable.

Broadly, 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(s), the trustee(s), the protector(s) (if any), the beneficiary(ies), or class(es) of beneficiaries, and any other natural person(s) exercising ultimate effective control over the trust, and in the case of a legal arrangement other than a trust, such term means persons in equivalent or similar positions. The term 'Controlling Person' shall be interpreted in a manner consistent with the Recommendations of the Financial Action Task Force (FATF). Please refer to the definition of a "Controlling Person" for further details.

Part 1 Identification of Individual Controlling Person

- A) Name of the Individual who is the Controlling Person:** Enter the full name of the individual identified as the Controlling Person. This is a mandatory field.
- B) Date of Birth:** Enter the Controlling Person's date of birth. Use the following format to input the Controlling Person's information DD-MM-YYYY. This is a mandatory field.
- C) Place of Birth:** Enter the Controlling Person's place of birth by including the town, city, and country or jurisdiction of birth, where applicable. This is a mandatory field.
- D) Current Residence Address:** Enter the Controlling Person's current residence address. This is a mandatory field.
- E) Mailing Address:** Enter the Controlling Person's mailing address only if it is different from the Current Residence Address.
- F) Gender*:** Check the relevant box indicating the Controlling Person's gender.
- G) Country(ies)/Jurisdiction(s) of Citizenship*:** Enter the Controlling Person's country(ies) or jurisdiction(s) of citizenship.
- H) Identification Number*:** Enter the Controlling Person's identification number.

*Complete fields F, G, and H only if the Entity maintains a Financial Account in India.

#Please refer to the **Definitions** provided in this Self-Certification for an explanation of an Account Holder.

Part 2 Tax Residence Information

Please complete the table indicating (i) the country(ies)/jurisdiction(s) where the Controlling Person is/are Resident for tax purposes and (ii) the Controlling Person's TIN for each country/jurisdiction indicated. Please refer to the Definitions provided in this Self-Certification for an explanation on "Resident for tax purposes".

For more information on tax residence, please consult your tax advisor or refer to the information at OECD automatic exchange of information portal at <http://www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/tax-residency/#d.en.347760>

If a TIN is unavailable, please indicate only one of the following reasons:

- Reason (A): Country/Jurisdiction does not issue TINs.
- Reason (B): Country/Jurisdiction issues TINs and requires Financial Institutions to collect TINs, but the Controlling Person is unable or not required to obtain a TIN. Please provide an explanation as to why the Controlling Person is unable or not required to obtain a TIN in the table.
- Reason (C): No TIN is required. Country/Jurisdiction issues TINs but the country/jurisdiction does not require Financial Institutions to collect TINs from its residents.

This is a mandatory field.

Part 3 Citizenship/Residence by Investment

Citizenship/Residence by Investment declaration of Controlling Person: If all of the Controlling Person's Tax Residence Countries/ Jurisdictions provided in Part 2 are included in the OECD list of CBI/RBI countries/jurisdictions in Part 3, please tick "Yes" to Question i and complete each of the remaining Questions ii to v (and vi if applicable). Otherwise, please tick "No" to Question i and proceed to Part 4.

If "Yes" is ticked for any of the Questions iii to v, please include the relevant country/jurisdiction as a Tax Residence Country/Jurisdiction of the Controlling Person in Part 2. Otherwise, please complete Question vi by providing the relevant country/jurisdiction, related Question (iii, iv or v), and the reason that it should not be considered a Tax Residence Country/ Jurisdiction of the Controlling Person in Part 2.

Part 4 Type of Controlling Person

Type of Controlling Person: Please provide the Controlling Person's capacity by ticking the appropriate box(es). Please refer to the definition of a "Controlling Person" for further details.

Part 5 Declaration and Signature

Declaration and Signature: The Self-Certification must be signed and dated by the Controlling Person. If the Self-Certification Form is completed by an Individual authorised to sign for the Controlling Person, please indicate the capacity in which the Individual is signing the Self-Certification. This is a mandatory field.

Capacity: An authorised representative must state the capacity in which he/she is signing on behalf of the Controlling Person. If this Self-Certification is completed by an agent acting under a duly authorised power of attorney, the Self-Certification must be accompanied by the power of attorney in proper form specifically authorising the agent to represent the Controlling Person in making, executing, and presenting the Self-Certification.

Definitions

Important note on the OECD 2023 update to the Common Reporting Standard: Certain definitions and expressions used in this Self-Certification reflect updates and concepts introduced under the **OECD's 2023 Amendments to the Common Reporting Standard ("CRS 2.0")**. Such definitions and expressions are indicated in *italics* in this section. As implementation of CRS 2.0 may vary across jurisdictions, you should not assume that all references or terminology herein reflect the law or practice applicable in your jurisdiction.

You are strongly encouraged to consult with your tax, legal, and/or professional advisor or refer to the information at OECD automatic exchange of information portal to determine how the CRS, including CRS 2.0 amendments, applies to your specific circumstances.

Further information on the CRS, including CRS 2.0 amendments can be found at the OECD Tax Transparency Resource Centre at: <https://www.oecd.org/en/topics/sub-issues/international-standards-on-tax-transparency/tax-transparency-resource-centre.html>

The following is a non-exhaustive list of selected terms that is intended as a guide to assist you in completing this Self-Certification. Should you have any questions, please contact your tax, legal, and/or other professional advisor.

- Account Holder:** The term 'Account Holder' means the person listed or identified as the holder of a Financial Account. A person, other than a Financial Institution, holding a Financial Account for the benefit of another person as an agent, a custodian, a nominee, a signatory, an investment advisor, an intermediary, or as a legal guardian, is not treated as the Account Holder. In these circumstances that other person is the Account Holder. For example, in the case of a parent/child relationship where the parent is acting as a legal guardian, the child is regarded as the Account Holder. With respect to a jointly held account, each joint holder is treated as an Account Holder.

Subject to applicable regulations and guidance, an Account Holder may include an individual who is a settlor, beneficiary, protector, or other person holding an equity or debt interest of a trust administered by a professional corporate trustee or a trust company, i.e., a trustee that, as its primary business, invests, administers, or manages the assets for trusts (or other customers). An 'equity interest' may be considered to be held in the case of a trust that is a Financial Institution, by any person treated as a settlor or beneficiary of all or a portion of the trust, or any other natural person exercising ultimate effective control over the trust.

- **Active Non-Financial Entity (NFE):** Any entity that is not a Financial Institution (FI) that meets any of the following criteria:
 - (i) **Active Business:** 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;
 - (ii) **An entity** that is publicly traded or a Related Entity of a publicly traded Entity: 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 traded on an established securities market;
 - (iii) **Governmental Entity/International Organisation/Central Bank:** The NFE is a Governmental Entity, an International Organisation, a Central Bank, or an Entity wholly owned by one or more of the foregoing;
 - (iv) **Holding company** that is a member of a non-financial group: 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;
 - (v) **Start-up company:** 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;
 - (vi) **Liquidating company:** 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;
 - (vii) **Financial company of a non-financial group:** 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
 - (viii) **Charity or non-profit organisation:** The NFE meets all of the following requirements:
 - (a) 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;
 - (b) It is exempt from income tax in its jurisdiction of residence;
 - (c) It has no shareholders or members who have a proprietary or beneficial interest in its income or assets;
 - (d) 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 entity has purchased; and
 - (e) 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:** An institution that is by law or government sanction the principal authority, other than the government of the jurisdiction itself, issuing instruments intended to circulate as currency. Such an institution

may include an instrumentality that is separate from the government of the jurisdiction, whether or not owned in whole or in part by the jurisdiction.

- **Central Bank Digital Currency:** Any digital Fiat Currency issued by a Central Bank or monetary authority.
- **Controlling Person:** The natural persons who exercise control over an Entity. In the case of a trust, such term means the settlor(s), the trustee(s), the protector(s) (if any), the beneficiary(ies), or class(es) of beneficiaries, and any other natural person(s) exercising ultimate effective control over the trust, and in the case of a legal arrangement other than a trust, such term means persons in equivalent or similar positions. The term 'Controlling Person' shall be interpreted in a manner consistent with the Recommendations of the Financial Action Task Force (FATF) provided as follows.
 - (i) For legal persons:
 - (a) Natural persons (if any – as ownership interests can be so diversified that there are no natural persons (whether acting alone or together) exercising control of the legal person or arrangement through ownership) who ultimately have a controlling ownership interest (a controlling ownership interest depends on the ownership structure of the company. It may be based on a threshold, e.g. any person owning more than a certain percentage of the company (e.g. 25%)) in a legal person; and
 - (b) to the extent that there is doubt under (a) as to whether the person(s) with the controlling ownership interest are the beneficial owner(s) or where no natural person exerts control through ownership interests, the natural persons (if any) exercising control of the legal person or arrangement through other means.
 - (c) Where no natural person is identified under (a) or (b) above, the relevant natural person who holds the position of senior managing official.
 - (ii) For Trusts – the settlor, the trustee(s), the protector (if any), the beneficiaries or class of beneficiaries, and any other natural person exercising ultimate effective control over the trust (including through a chain of control/ownership)
 - (iii) Other types of legal arrangements (non-trust) – Persons in equivalent or similar positions.

For purposes of determining the Controlling Persons of an Account Holder, reference should be made to the AML/KYC Procedures pursuant to the anti-money laundering or similar requirements as implemented in the domestic law applies.
- **Crypto-Asset:** A digital representation of value that relies on a cryptographically secured distributed ledger or a similar technology to validate and secure transactions (irrespective of whether the transaction is actually recorded on that ledger or technology).
- **Custodial Institution:** Any Entity that holds, as a substantial portion of its business, Financial Assets for the account of others. An Entity holds Financial Assets for the account of others as a substantial portion of its business if the Entity's gross income attributable to the holding of Financial Assets and related financial services, *whether this income is paid directly or indirectly to the Entity*, equals or exceeds 20 percent of the Entity's gross income during the shorter of: (i) the three-year period that ends on 31 December (or the final day of a non-calendar year accounting period) prior to the year in which the determination is being made; or (ii) the period during which the Entity has been in existence.
- **Depository Institution:** Any Entity that accepts deposits in the ordinary course of a banking or similar business, *or is licensed to do so, or holds Specified Electronic Money Products or Central Bank Digital Currencies for the benefit of customers.*
- **Entity:** A legal person or a legal arrangement, such as a corporation, organisation, partnership, trust, or foundation.
- **Established Securities Market:** An exchange that is officially recognised and supervised by a governmental authority in which the market is located and that has a meaningful annual value of shares traded on the exchange.
- **Fiat Currency:** The official currency of a jurisdiction, issued by a jurisdiction or by a jurisdiction's designated Central Bank or monetary authority, as represented by physical banknotes or coins or by money in different digital forms, including bank reserves and Central Bank Digital Currencies.

- **Financial Account:** A Financial Account is an account maintained by a Financial Institution and is either a depository account, a custodial account, an equity and debt interest in certain investment entities, a cash value insurance contract, or an annuity contract.
- **Financial Asset:** The term "Financial Asset" includes a security (for example, a share of stock in a corporation; partnership or beneficial ownership interest in a widely held or publicly traded partnership or trust; note, bond, debenture, or other evidence of indebtedness), partnership interest, commodity, swap (for example, interest rate swaps, currency swaps, basis swaps, interest rate caps, interest rate floors, commodity swaps, equity swaps, equity index swaps, and similar agreements), Insurance Contract or Annuity Contract, or any interest (including a futures or forward contract or option) in a security, *Relevant Crypto-Asset*, partnership interest, commodity, swap, Insurance Contract, or Annuity Contract. The term "Financial Asset" does not include a non-debt, direct interest in real property.
- **Financial Institution:** Any of the following:
 - A Depository Institution
 - A Custodial Institution
 - An Investment Entity
 - A Specified Insurance Company
- **Governmental Entity:** The government of a jurisdiction, any political subdivision of a jurisdiction (which, for the avoidance of doubt, includes a state, province, county, or municipality), or any wholly owned agency or instrumentality of a jurisdiction or any one or more of the foregoing (each, "Governmental Entity"). 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 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:
 - The Entity is wholly owned and controlled by one or more Governmental Entities directly or through one or more controlled entities;
 - 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
 - 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 program, and the program 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.
- **International Organisation:** 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:** There are two types of Investment Entities:
 - Entity that primarily conducts as a business (or is managed by an Entity that conducts as a business) one or more of the following activities or operations for or on behalf of a customer:
 - 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;
 - individual and collective portfolio management; or
 - otherwise investing, administering, or managing funds or money (including Central Bank Digital Currencies, or Relevant Crypto-Assets) on behalf of other persons (*this does not include the provision of services effectuating exchange transactions for or on behalf of other persons*); or
 - The second type of "Investment Entity" ("Investment Entity managed by another FI") is any entity the gross income of which (*whether paid*

directly or indirectly to the Entity) is primarily attributable to investing, reinvesting, or trading in Financial Assets or *Relevant Crypto-Assets* where the Entity is managed by another Entity that is a Depository Institution, a Custodial Institution, a Specified Insurance Company, or the first type of Investment Entity.

- **Participating Jurisdiction:**
A jurisdiction –
 - with which an agreement is in place pursuant to which it will provide the specified information under CRS as required on the automatic exchange of financial account information, and
 - which is identified in a list published by the OECD.
 For more information on jurisdictions participating in the CRS, please consult your tax advisor or refer to the information at OECD automatic exchange of information portal at:
<https://www.oecd.org/en/topics/sub-issues/international-standards-on-tax-transparency/tax-transparency-resource-centre.html#crs>
- **Passive NFE:** For CRS purposes only, any NFE (being an entity that is not a FI) that is not an Active NFE. (Note: Similar treatment will be applied to an Investment Entity located in a Non-Participating Jurisdiction and managed by another Financial Institution).
- **Related Entity:** An Entity is regarded as being related to another Entity if:
 - One controls the other; or
 - The two Entities are under common control.
 Control means: Direct or indirect ownership of more than 50 percent of the vote and value in an Entity.
- **Relevant Crypto-Asset:** Any Crypto-Asset that is not a Central Bank Digital Currency or an electronic money product, or that cannot be used for payment or investment purposes.
- **Reportable Account:** An account that, pursuant to due diligence procedures consistent with CRS, has been identified as an account that is held by one or more persons that are Reportable Persons or by a Passive NFE with one or more Controlling Persons that are Reportable Persons with respect to another Jurisdiction.
- **Reportable Jurisdiction:** A Reportable Jurisdiction is a Participating Jurisdiction with which an obligation to provide financial account information is in place and that is identified in a published list.
- **Reportable Jurisdiction Person:** An Individual or Entity that is resident in a Reportable Jurisdiction under the tax laws of such jurisdiction, or an estate of a decedent that was a resident of a Reportable Jurisdiction. For this purpose, an Entity such as a partnership, limited liability partnership or similar legal arrangement that has no residence for tax purposes shall be treated as resident in the jurisdiction in which its place of effective management is situated.
- **Reportable Person:** A Reportable Jurisdiction Person other than:
 - an entity the stock of which is regularly traded on one or more Established Securities Markets;
 - any entity that is a Related Entity of an entity described in clause (i);
 - a Governmental Entity;
 - an International Organisation;
 - a Central Bank; or
 - a Financial Institution (except for an Investment Entity located in a Non-Participating Jurisdiction and managed by another FI).
- **Resident for tax purposes:** Each jurisdiction has its own rules for defining tax residence, and jurisdictions have provided information on how to determine whether an entity is tax resident in the jurisdiction on the OECD automatic exchange of information portal. Generally, an Entity will be resident for tax purposes in a jurisdiction if, under the laws of that jurisdiction (including tax conventions), it pays or should be paying tax therein by reason of his domicile, residence, place of management or incorporation, or any other criterion of a similar nature, and not only from sources in that jurisdiction. An Entity such as a partnership, limited liability partnership or similar legal arrangement that has no residence for tax purposes shall be treated as resident in the jurisdiction in which its place of effective management or the address of its principal office is situated. For additional information on tax residence, please talk to your legal, tax, or other professional advisor or refer to the OECD automatic exchange of information portal on tax residency:
<https://www.oecd.org/en/networks/global-forum-tax-transparency/resources/aeoi-implementation-portal/tax-residency.html>

- **Specified Electronic Money Product:** The term “Specified Electronic Money Product” means any Crypto-Asset that is:
 - (i) a digital representation of a single Fiat Currency;
 - (ii) issued on receipt of funds for the purpose of making payment transactions;
 - (iii) represented by a claim on the issuer denominated in the same Fiat Currency;
 - (iv) accepted in payment by a natural or legal person other than the issuer; and
 - (v) by virtue of regulatory requirements to which the issuer is subject, redeemable at any time and at par value for the same Fiat Currency upon request of the holder of the product.

The term “Specified Electronic Money Product” does not include a product created for the sole purpose of facilitating the transfer of funds from a customer to another person pursuant to instructions of the customer. A product is not created for the sole purpose of facilitating the transfer of funds if, in the ordinary course of business of the transferring Entity, either the funds connected with such product are held longer than 60 days after receipt of instructions to facilitate the transfer, or, if no instructions are received, the funds connected with such product are held longer than 60 days after receipt of the funds.
- **Specified Insurance Company:** 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.
- **Taxpayer Identification Number (TIN):** TIN or a functional equivalent in the absence of a TIN. A TIN is a unique combination of letters or numbers 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. Further details of acceptable TINs can be found at: <https://www.oecd.org/en/networks/global-forum-tax-transparency/resources/aeoi-implementation-portal/tax-identification-numbers.html>. 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.