STONEHAGE FLEMING POOLED INVESTMENTS (IRELAND) PLC

Application Form

March 2026

PRIVATE AND CONFIDENTIAL
NOT FOR USE BY US PERSONS

c/o
Northern Trust International Fund Administration Services (Ireland) Limited
2nd Floor, Block A, City East Plaza, Towlerton, Ballysimon, Limerick, V94 X2N9, Ireland
t: +353 1 434 5074 f: +353 1 5539440
e: Stonehage_TA@ntrs.com e: StonehageTAInstructions@ntrs.com

INSTRUCTIONS FOR COMPLETING THE APPLICATION FORM

This duly signed Application Form, valid signed FATCA/CRS forms together with full Anti-Money Laundering (AML) Due Diligence Documentation (as per Appendix A) constitutes your agreement to subscribe for Shares in the Fund. You should post, email or fax this Application Form to the Administrator using the details provided on the cover page of this Application Form.

An incomplete Application Form (where compulsory information* and AML verification documents have not been provided in advance) may be rejected and any subscription monies received may be returned. If an application is rejected, the Administrator at the cost and risk of the Applicant will, subject to any applicable laws, return application monies or the balance thereof, without interest, expenses or compensation by electronic transfer to the account from which it was paid (less any applicable bank charges where applicable).

Applicants (the "**Applicants**") must read the Company's prospectus (the "**Prospectus**"), supplement in respect of the relevant Fund ("**Supplement**") and the key investor information document relating to the relevant Fund (comprising either (i) a key information document prepared in accordance with Regulation 1286/2104 ("**PRIIPs Regulation**"); or (ii) a key investor information document prepared in accordance with the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations 2011, as amended) ("**UCITS Regulations**") as applicable (each a "**Key Information Document**") before completing this Application Form.

This Application Form is the property of the Company and may not be tampered with or amended without the consent of the Company. Any breach of the foregoing may render the Application Form void.

Please enter all details (s) using block capitals.

Sections requiring completion (dependent on Applicant type):	Pages(s)
Initial Subscription	*5*
Applicant Details	*6*
Investment Advisor / Intermediary Details (**if applicable**)	*7*
Distribution Option & Investor Bank Details	*8*
Investment Settlement Details	*9*
Investment Undertaking Tax – Declaration of Residence	*12*
Investor Bank Details (**unless provided separately**)	*8*
Declaration of Residence outside of Ireland	*14*
Return of Values Regulations 2013 (**Irish residents only**)	*15*
FATCA / CRS Certification	*17*
Disclosure Statements	*30*
Anti-Money Laundering Due Diligence	*41*
Signature	*45*
Beneficial Owner Details (**if applicable**)	*46 - 49*
Appendix A	*50*
Appendix *B.1* & *B.2*: AML Letter (**if applicable**)	*68*
Appendix C Data Privacy Statement	*72*

* Anti-money Laundering documentation requirements are outlined in *Appendix A*.

1. GENERAL INFORMATION

The Company reserves the right to reject any application in whole or in part, without giving any reason for such rejection in which event any application moneys will be returned without interest, expenses or compensation by transfer to the Applicant's designated bank account at the risk of the Applicant.

If the amount paid does not correspond to a specific number of Shares, the Company will issue such number of Shares, calculated to two decimal places, as may be subscribed for with the application moneys and will not return any remainder to the Applicant.

1.1 Contract notes

It is anticipated that contract notes will normally be sent to Applicants *as soon as possible, and no later than the first business day following execution of the NAV*. Please ensure that appropriate email contact details are provided.

Important

It is the responsibility of the Applicant to check the accuracy of information provided to you in any confirmation of ownership, any valuation statements and other reports issued by, or on behalf of, the Company. You should contact the Administrator immediately in the event that you believe the information to be incorrect. It will be assumed that you have received Contract Notes and that the details contained therein are correct unless you contact the Administrator within 24 hours of the date of issue. The Company's liability and ability to change contract notes will be restricted after this time: however, the Company reserves the right to correct errors at any time and will endeavour to ensure errors are corrected.

1.2 Subscriptions

Where permitted by the Company, subsequent subscription applications may be submitted by electronic means, for example, by way of an electronic messaging network for facilitating the exchange of electronic trading communications between financial Organisation s or other similar secure network, each a "**Message Network**".

Initial subscription applications submitted by email will be accepted. Payment in respect of subscriptions must be received in cleared funds by the Administrator no later than the relevant payment deadline as per the prospectus.

1.3 Redemptions

Redemption requests may be submitted by way of a signed form sent to the Company at the address noted on the cover page, fax to the Company at +353 1 5539440, via email to StonehageTAInstructions@ntrs.com, written communication or by electronic means, for example by way of a Message Network, prior to the Dealing Deadline for any Dealing Day as set out in the Prospectus and/or relevant Supplement, provided that no redemption payment will be made from an investor holding until cleared funds have been received in respect of the original subscription for Shares, the subscription application form and all documentation required by or on behalf of the Company (including any documents in connection with anti-money laundering procedures) has been received from the investor by the Administrator on behalf of the Company and the anti-money laundering procedures have been completed. Failure to comply with the above will result in redemption proceeds not being paid.

Shareholders and prospective investors should note that all or part of the fees and expenses of the Company may be charged to the capital of the Company. Thus, on redemptions of holdings shareholders may not receive back the full amount invested.

1.4 Distributions

The Company may pay distributions to Shareholders out of the capital assets of the relevant Fund (if provided for in the Prospectus and/or the relevant Supplement). The effect of any such payment out of capital is that capital will be eroded to allow dividends to be paid, thereby reducing the potential for future capital growth. This cycle may continue until all capital is depleted.

1.5 Queries

All queries regarding the completion of the Application Form should be addressed to the Company c/o the Administrator and specifying the Company and the Fund to which the query relates. The Administrator can be contacted by phone at +353 1 434 5074 or email at Stonehage_TA@ntrs.com.

Terms defined in the Prospectus and/or the relevant Supplement have the same meaning in this Application Form.

2. INITIAL SUBSCRIPTION

Fund / Class Name	ISIN	Investment Amount	Number of Shares
Stonehage Fleming Global Best Ideas Equity Fund			
Class A	IE00BCLYMB94	$	Shares
Class B	IE00BCLYMC02	$	Shares
Class C	IE00BCLYMD19	£	Shares
Class D (dist.)	IE00BCLYMF33	£	Shares
Class D (acc.)	IE000UW0UCW4	£	Shares
Class E	IE00BDB5NR23	$	Shares
Class F	IE00BDB5NS30	£	Shares
Class G	IE00BDB5NT47	$	Shares
Class H	IE00BDB5NV68	£	Shares
Class I	IE00BDB5NW75	€	Shares
Class J	IE00BDB5NX82	CHF	Shares
Stonehage Fleming Global Multi-Asset Portfolio			
Class A	IE00BYZ6S628	$	Shares
Class B	IE00BYZ6S735	$	Shares
Class C	IE00BYZ6S842	£	Shares
Stonehage Fleming Global Select Equity Fund			
Class B	IE00BMGR6K03	$	Shares
Class D	IE00BMGR6M27	£	Shares
Class E	IE00BMGR6N34	$	Shares
Class F	IE00BMGR6P57	£	Shares
Class S	IE00BMGR6Q64	£	Shares
Class X	IE00BMGR6R71	$	Shares
Class Y	IE00BMGR6S88	£	Shares

3. APPLICANT DETAILS

Please note that by completing this Application Form you are providing personal data to the Company for the purposes of applying for Shares in the relevant Fund(s). This data will be used for the purposes set out in the Company's data privacy statement, which is set out in *Appendix C* hereto and is otherwise available upon request.

The Applicant Name(s) will be the registered name as reflected on the share register.

Applicant Name	
Applicant Name 2 (Joint Holder)	

All communications will be delivered to the **correspondence** details of the first named shareholder

APPLICANT 1	
Registered Address	
Street Address	
Town / City	
Postcode	
Country	
Date of Birth	

APPLICANT 2	
Registered Address	
Street Address	
Town / City	
Postcode	
Country	
Date of Birth	

CORRESPONDENCE DETAILS	
Street Address	
Town / City	
Postcode	
Country	
Telephone	
Email Address(es)	

PLEASE TICK THE FOLLOWING BOX IF YOU WOULD LIKE YOUR ADVISOR / INTERMEDIARY TO RECEIVE COPIES OF ALL REPORTING RELATING TO YOUR ACCOUNT ☐

Email correspondence, where provided, will be the preferred method of communication. If no email is provided, correspondence will then be issued via post. SWIFT communication will be issued where possible.

Please note that only the email addresses confirmed on this form will be eligible to receive information or documentation, including contract notes and statements, in relation to the Registered Account.

If the Administrator receives a request from an unauthorised email address, the requester will be asked to submit an instruction to update the account with the additional email address(es). This instruction should be signed in accordance with the Registered Accounts' authorised Signatory list.

(Please ensure the appropriate document is selected to ensure receipt otherwise all options will be selected)

Email Address or Swift Code	Welcome Email	Contract Notes	Statements	SWIFT

4. INVESTMENT ADVISOR / AGENT / INTERMEDIARY DETAILS

Name of Advisor/Agent/Intermediary		
Company Registration Number		
Is the Company Regulated?	Yes ☐	No ☐
Regulator Name		

CORRESPONDENCE DETAILS	
Street Address	
Town / City	
Postcode	
Country	
Telephone	
Email Address(es)	

5. DISTRIBUTION OPTION

Please tick as appropriate. If no selection is made all dividends will be automatically reinvested.

☐ Please reinvest all dividends into shares of the same class in the relevant fund

☐ Please pay all dividends to the bank details supplied
No dividends will be paid on any Accumulation share classes.

5.1 Investor bank details

Third party payments are not permitted for subscriptions nor redemptions. Please confirm the details of the bank accounts from which and to which payments will be made below.

A copy of a recent bank statement (no more than 6 months old) or a banker's reference, must accompany the application to evidence the bank account details provided for subscriptions and redemptions payments are for a bank account in the registered account name. Accounts in the name of regulated entities are exempt from this requirement.

To meet our anti-money laundering and counter terrorist financing obligations under the current legislation, all joint bank account holders will be required to complete identity and verification requirements, even where those joint bank account holders will not be registered holders of shares or units in the fund.

Failure to provide all the bank account information and documentation requested as part of this application may result in a delay in setting up the account and subscribing to the fund.

THIS SECTION MUST BE COMPLETED BY ALL INVESTORS OTHER THAN EQUIVALENTLY REGULATED ENTITIES OPENING AN ACCOUNT IN THEIR OWN NAME OR THE NAME OF THEIR NOMINEE COMPANY, EITHER FOR THEIR OWN BENEFIT OR THE BENEFIT OF ONE OR MORE THIRD PARTIES

- Bank account details from which subscriptions will be paid
- Bank account details for settlement of redemptions (and dividend/distribution
- Proceeds if applicable)

5.1.1 Beneficiary bank information

Name of Bank	
A/c Name	
Address of Bank	
A/c Number	
Sort Code	

IBAN:			
Swift Code / ABA		Reference Code	

A request to change bank account details MUST BE MADE IN WRITING TO THE ADMINSTRATOR AND MUST BE ACCOMPANIED BY A bank statement or banker's reference (no more than 6 months old) to evidence the new bank account details provided are for a bank account in your sole or joint name.

5.1.2 Correspondent bank information

Note: Required if Payment CCY differs to bank account residency or if your bank account does not support Multi currency payments

Correspondent Bank Name	
Correspondent BIC/SWIFT Code/Sort Code/ABA Code	
Correspondent A/c Name	
Correspondent Account Number / IBAN	
Correspondent Bank Address	

6. INVESTMENT SETTLEMENT DETAILS

Listed below are the bank details to which the Applicant's money should be settled in full by wire transfer. The Applicant's bank must be instructed at the time of application to forward the appropriate remittance by the fastest available means to reach the relevant bank account listed below (based on the currency of the investment) for value not later than 3 Business Days following the relevant Dealing Day on which the application is to be effective. Payment, net of charges, should be sent to the details below. Please note that, where appropriate, both the Intermediary Bank details and the Beneficiary bank details must be provided when instructing the transfer. In addition, for non-USD payments where both the Intermediary and Beneficiary account details are required, please note that most personal online banking platforms will not facilitate this. The Fund has two GBP-denominated bank accounts – one in the United Kingdom and the other in the United States. If you are resident and domiciled in the UK, the UK bank account is likely to be the account to which you should instruct the bank to send the funds to. If you are resident in the UK but not domiciled or deemed domiciled in the UK, and are concerned that (however remote that risk might be as a matter of UK tax law) transferring funds to the UK might constitute a taxable remittance, then you should instruct your bank to send the funds to the United States bank account. Should you have any problems entering these details, please contact your bank.

Please note that none of the above instructions should be considered to be tax advice. Please consult with your own tax professional if you are in any doubt as to which bank account details should be used. The Company, the Directors, the Distributor, the Manager and the Administrator will not be responsible for any loss or damage that could result from the remittance of monies as part of the subscription process.

	For GBP settlement (New Jersey, USA)[1]	For GBP settlement (London, UK)[2]	For EURO settlement	For USD settlement	For CHF settlement
	Please read the footnote				
Intermediary Bank	Barclays Bank		Barclays Bank PLC,		UBS Switzerland AG, Zurich
Intermediary Address	1 Churchill Place, London E14 5HP		Frankfurt		Bahnhofstrasse 45, Zurich, 8098, Switzerland
Intermediary SWIFT Code:	BARCGB22		BARCDEFF		UBSWCHZH80A
Intermediary Banks Sort Code	203253				
Beneficiary Banks Account Number	53529495		0210472800		IBAN: CH5900230230079 45905X
Beneficiary Bank	The Northern Trust International Banking Corporation, New Jersey	Barclays Bank 1 Churchill Place, London E14 5HP	The Northern Trust International Banking Corporation, New Jersey	The Northern Trust International Banking Corporation FedwireABA: 026001122 CHIPS: 0112	The Northern Trust International Banking Corporation, New Jersey N/A
Beneficiary Bank SWIFT code	CNORUS33		CNORUS33	CNORUS33	CNORUS33
Beneficiary Bank Sort code		203253			
Beneficiary account name & number	Stonehage Fleming Pooled Investments (Ireland) PLC 61685420019	Northern Trust Co 53529495	Stonehage Fleming Pooled Investments (Ireland) PLC 61683920019	Stonehage Fleming Pooled Investments (Ireland) PLC 24781720010	Stonehage Fleming Pooled Investments (Ireland) PLC 61687020019
Reference: Register number and/or order number		61685420019			

Note: Currency subscription settlement times. Time by which monies must be received

GBP	16:00 GMT	GBP (BACS)	15:00 GMT		
EURO	14:30 GMT	USD	16:00 GMT	CHF	10:30 GMT

[1] *For all GBP clients except UK retail clients wishing to make payments online.*
[2] *For GBP UK retail clients wishing to make payments online.*

6.1.1 Investor Tax Residency

Please tick the relevant box

A.	☐	NON-U.S. TAXPAYER
B.	☐	U.S. TAXPAYER*
C.	☐	ONE OR MORE JOINT APPLICANTS IS A U.S. TAXPAYER
D.	☐	NON-U.S. TAXPAYER HOLDING SHARES ON BEHALF OF A U.S. TAXPAYER

If B, C or D has been ticked then each U.S. taxpayer must complete and sign IRS Form W-9 to certify their tax identification number. The form can be downloaded from www.irs.com. Failure to submit a completed IRS Form W-9 (where applicable) will result in a delay in the settling of redemption/dividend proceeds (no interest will accrue).

"U.S. Taxpayer**" is defined to include a U.S. citizen or resident alien of the United States (as defined for United States federal income tax purposes); any entity treated as a partnership or corporation for U.S. tax purposes that is created or organised in, or under the laws of, the United States or any state thereof (including the District of Colombia); any other partnership that is treated as a U.S. Taxpayer under U.S. Treasury Department regulations; any estate, the income of which is subject to U.S. income taxation regardless of source; and any trust over whose administration a court within the United States has primary supervision and all substantial decisions of which are under the control of one or more U.S. fiduciaries. Persons who have lost their U.S. citizenship and who live outside the United States may nonetheless, in some circumstances, be treated as U.S. Taxpayers.*

*An investor may be a "**U.S. Taxpayer**" but not a "**U.S. Person**". For example, an individual who is a U.S. citizen residing outside of the United States is not a "**U.S. Person**" but is a "**U.S. Taxpayer**".*

U.S. Taxpayers will be required to furnish the Administrator with a properly executed IRS Form W-9. Amounts paid to Unitholders who are U.S. Taxpayers as a distribution from the Fund, or as gross proceeds from a redemption of Shares, will generally be reported to Unitholders who are U.S. Taxpayers and the IRS on an IRS Form 1099 (except as otherwise noted below). Failure to provide an appropriate and properly executed IRS Form W-9 (for Unitholders who are U.S. Taxpayers) may subject such Unitholders to backup withholding tax. Backup withholding tax is not an additional tax. Any amounts withheld may be credited against such Unitholders' U.S. federal income tax liability.

Tax exempt entities, corporations, non-U.S. Unitholders and certain other categories of Unitholders generally will not be subject to reporting on IRS Form 1099 or backup withholding, provided that, in the case of tax exempt entities and corporations such Unitholders furnish the Administrator with an appropriate and properly executed IRS Form W-9 certifying as to their tax exempt status.

7. INVESTMENT UNDERTAKING TAX - DECLARATION OF RESIDENCE

7.1 Declaration of Exempt Irish Investors

7.1.1 Declaration referred to in Section 739D(6) Taxes Consolidation Act 1997 ("**TCA 1997**")

It is important to note that this declaration, if it is then still correct, shall apply in respect of any subsequent acquisitions of Shares.

- I declare that the information contained in this declaration is true and correct.
- I also declare that I am applying for the Shares on behalf of the applicant named below who is entitled to the Shares in respect of which this declaration is made and is a person referred to in Section 739D(6) TCA 1997, being a person who is:

Please tick as appropriate

a pension scheme;	☐
a company carrying on life business within the meaning of section 706 TCA 1997;	☐
an investment undertaking;	☐
an investment limited partnership;	☐
a special investment scheme;	☐
An exempt unit trust to which section 731(5)(a) TCA 1997 applies;	☐
a charity being a person referred to in section 739D(6)(f)(i) TCA 1997;	☐
a qualifying management company;	☐
a person entitled to exemption from income tax and capital gains tax by virtue of section 784A(2) TCA, 1997* (see further requirement for Qualifying Fund Manager below);	☐
a person entitled to exemption from income tax and capital gains tax by virtue of section 787I* (see further requirements for PRSA Administrator below);	☐
a credit union within the meaning of section 2 of the Credit Union Act 1997;	☐

7.1.2 Additional requirements where the declaration is completed on behalf of a Charity

- I also declare that at the time of making this declaration, the Shares in respect of which this declaration is made are held for charitable purposes only and
  - form part of the assets of a body of persons or trust treated by the Revenue Commissioners as a body or trust established for charitable purposes only, or
  - are, according to the rules or regulations established by statute, charter, decree, deed of trust or will, held for charitable purposes only and are so treated by the Revenue Commissioners.
- I undertake that, in the event that the person referred to in paragraph (7) of Schedule 2B TCA 1997 ceases to be a person referred to in Section 739D(6)(f)(i) TCA, 1997, I will, by written notice, bring this fact to the attention of the investment undertaking accordingly.

***Delete as appropriate**

7.1.3 Additional requirements where the declaration is completed by a qualifying fund manager / PRSA Administrator.

- * also declare that at the time this declaration is made, the Shares in respect of which this declaration is made are assets of
  *
  and are managed by the Declarant for the individual named below who is beneficially entitled to the units.
- * undertake that, if the Shares cease to be assets of
  * ,
  including a case where the Shares are transferred to another such fund or account,
  * will, by written notice, bring this fact to the attention of the investment undertaking accordingly.

***Delete as appropriate**

7.1.4 Additional requirements where the declaration is completed by an Intermediary

- * also declare that * applying for Shares on behalf of persons who to the best of * knowledge and belief, have beneficial entitlement to each of the shares in respect of which this declaration is made, and is a person referred to in section 739D(6) TCA 1997.
- * further declare that
- Unless * specifically notify you to the contrary at the time of application, all applications for Shares made by * from the date of this application will be made on behalf of persons referred to in section 739D TCA 1997, and
- * will inform you in writing if * become aware that any person ceases to be a person referred to in section 739D(6) TCA 1997.

*** Delete as appropriate**

Name of applicant	
Irish tax reference number of applicant	
Authorised signatory (declarant)	
Capacity in which declaration is made	
Authorised signatory (declarant)	
Capacity in which declaration is made	
Date	

IMPORTANT NOTES

1. *This is a form authorised by the Revenue Commissioners which may be subject to inspection. It is an offence to make a false declaration.*
2. *Tax reference number in relation to a person has the meaning assigned to it by Section 885 TCA, 1997 in relation to a "**specified person**" within the meaning of that section. In the case of a charity, quote the Charity Exemption Number (CHY) as issued by Revenue. In the case of a qualifying fund manager, quote the tax reference number of the beneficial owner of the Shares.*
3. *In the case of, (i) an exempt pension scheme, the administrator must sign the declaration; (ii) a retirement annuity contract to which Section 784 or 785 applies, the person carrying on the business of granting annuities must sign the declaration; (iii) a trust scheme, the trustees must sign the declaration. In the case of a charity, the declaration must be signed by the trustees or other authorised officer of a body of persons or trust established for charitable purposes only within the meaning of Sections 207 and 208 TCA 1997. In the case of an approved retirement fund/an approved minimum retirement fund, the declaration must be signed by a qualifying fund manager. In the case of a PRSA, the declaration must be signed by a PRSA administrator. In the case of an intermediary, the declaration must be signed by the intermediary. In the case of a company, the declaration must be signed by the company secretary or other authorised officer. In the case of a unit trust the declaration must be signed by the trustees. In any other case it must be signed by an authorised officer of the entity concerned or a person who holds a power of attorney from the entity. A copy of the power of attorney should be furnished in support of this declaration.*

8. DECLARATION OF RESIDENCE OUTSIDE OF IRELAND

Applicants resident outside Ireland are required by the Irish Revenue Commissioners to make the following declaration which is in a format authorised by them, in order to receive payment without deduction of tax. It is important to note that this declaration, if it is then still correct, shall apply in respect of any subsequent acquisitions of Shares. Terms used in this declaration are defined in the Prospectus.

Please tick one

☐ **DECLARATION ON OWN BEHALF**

* declare that * applying for the Shares on of a company* and that entitled to the Shares in respect of which this declaration is made and that

- * not currently Irish Resident or Ordinarily Resident in Ireland, and
- Should * become Irish Resident in Ireland * will so inform the Company, in writing, accordingly

☐ **DECLARATION AS INTERMEDIARY**

* declare that * applying for Shares on behalf of persons:

- who will be beneficially entitled to the Shares; and
- who, to the best of * knowledge and belief, are neither Irish Resident nor Ordinarily Resident in Ireland.

* also declare that:

- unless * specifically notify you to the contrary at the time of application, each application for Shares made by * from the date of this application will be made on behalf of such persons; and
- * will inform you in writing if * become aware that any person on whose behalf * hold(s) Shares, becomes Irish Resident.

*** Delete as appropriate**

IMPORTANT NOTES

1. *Definitions of an "**Intermediary**" and the concepts of "**Residence in Ireland**" and "**Ordinary Residence in Ireland**" are set out on the next page.*
2. *Declarations of Residence outside of Ireland are subject to inspection by the Irish Revenue Commissioners and it is a criminal offence to make a false declaration.*
3. *To be valid, the Declaration of Residence outside of Ireland must be signed by the Applicant. Where there is more than one Applicant, each person must sign. If the Applicant is a company, it must be executed under seal or signed by duly authorised signatories*
4. *If the Declaration of Residence outside of Ireland is signed under power of attorney, a copy of the power of attorney must be furnished in support of the signature.*
5. *Definitions of an "**Intermediary**" and the concepts of "**Residence in Ireland**" and "**Ordinary Residence in Ireland**" are set out on the next page.*

Date:

	Signed:	Capacity of authorized signatory (if applicable):
1.	_____	_____
2.	_____	_____
3.	_____	_____
4.	_____	_____

In the case of joint holders, ALL Applicants must complete this declaration.

9. RETURN OF VALUES (INVESTMENT UNDERTAKINGS) REGULATIONS 2013

The Return of Values (Investment Undertakings) Regulations 2013 (S.I. 245 of 2013) of Ireland (the "**RoV Regulations**") requires certain Irish investment undertakings to make annual returns to the Irish Revenue Commissioners of the value, in a tax year, of the investments held by certain unit holders.

In order to satisfy the RoV Regulations, the Company must collect the following additional information from any Applicants[3] which are Irish Resident or Ordinarily Resident in Ireland (that are not excepted unit holders within the meaning of the RoV Regulations):

Tax Reference Number (TRN) / PPS Number[4]

Furthermore, the RoV Regulations require the Company to seek appropriate documentation from the Applicant to verify the above TRN or PPS Number. Any one of the following additional documents (copy or original) is sufficient:

- P60
- P45
- P21 Balancing Statement
- Payslip (where employer is identified by name or tax number)
- Drug Payment Scheme Card
- European Health Insurance Card
- Tax Assessment
- Tax Return Form
- PAYE Notice of Tax Credits
- Child Benefit Award Letter /Book
- Pension Book
- Social Services Card
- Public Services Card

In addition, any printed documentation issued by the Irish Revenue Commissioners or by the Department of Social Protection which contains your name, address and TRN will also be acceptable. In the case of joint account holders, the additional documentation is required for each Applicant.

Your personal information will be handled by the Administrator or its duly appointed delegates as Data Processor for the Company in accordance with the Data Protection Acts 1988 to 2003 (as may be amended or supplemented from time to time) and from 25 May, 2018, the EU's General Data Protection Regulations 2016/679 (the "**GDPR**" (together the "**Data Protection Legislation**"). In particular, all the relevant security measures will be taken to ensure an adequate level of protection of the personal data against unauthorised access, accidental loss or destruction. Your information provided herein will be processed for the purposes of complying with the RoV Regulations and this may include disclosure to the Irish Revenue Commissioners.

---

[3] *Where the Applicant is an intermediary and that Applicant will be or is, as applicable, the registered Shareholder, reporting obligations under the RoV Regulations may be carried out on the basis that the intermediary is the Shareholder. For these purposes, intermediary has the same meaning as in Section 739B (1) of the Taxes Consolidation Act, 1997 of Ireland, as amended, (the "Taxes Act") the basis that the intermediary is the Shareholder. For these purposes, intermediary has the same meaning as in Section 739B (1) of the Taxes Act.*

[4] *A PPS Number is required if the relevant Applicant is an individual.*

10. INDIVIDUAL SELF-CERTIFICATION

Instructions for completion and Data Protection Notice

We are obliged under Section 891E, Section 891F and Section 891G of the Taxes Consolidation Act 1997 (as amended) and regulations made pursuant to those sections to collect certain information about each account holder's tax arrangements. Please complete the sections below as directed and provide any additional information that is requested. Please note that by completing this form you are providing personal information which may constitute personal data within the meaning of the General Data Protection Regulation (697/2016/EU) (the "**GDPR**") and applicable Irish data protection legislation (currently the Irish Data Protection Acts 1988 to 2018. Please note that in certain circumstances we may be legally obliged to share this information, and other financial information with respect to an account holder's interests in the Fund, with the Irish tax authorities, the Revenue Commissioners. They may in turn exchange this information, and other financial information with foreign tax authorities, including tax authorities outside the EU.

If you have any questions about this form or defining the account holder's tax residency status, please speak to a tax adviser or local tax authority.

For further information and guidance on FATCA or CRS please refer to the Irish Revenue or OECD website at:
https://www.revenue.ie/en/companies-and-charities/international-tax/aeoi/index.aspx
http://www.oecd.org/tax/automatic-exchange/common-reporting-standard/ in the case of CRS only.

If any of the information below about the account holder's tax residence or FATCA/CRS classification changes in the future, please advise of these changes promptly.

Please note that where there are joint account holders each account holder is required to complete a separate Self-Certification form.

11.1, ***11.2***, ***11.3*** **and** ***11.5*** **must be completed by all Account holders or Controlling Persons.** ***11.7*** **should only be completed by any individual who is a Controlling Person of an entity account holder which is a Passive Non-Financial Entity, or a Controlling Person of an Investment Entity located in a Non-Participating Jurisdiction and managed by another Financial Institution.**

(Mandatory fields are marked with an *)

10.1 Account holder / controlling person identification

Account Holder / Controlling Person / Name			
Current Residential Address			
House Name / Number			
Street			
City, Town, State, Province or County			
Postal Code		Country	

Mailing address (if different from above)			
House Name / Number			
Street			
City, Town, State, Province or County			
Postal Code		Country	

Place and Date of Birth	
Place of Birth (town or city)	
Country of Birth	Date of Birth

10.2 FATCA Declaration of U.S. Citizenship or U.S. Residence for Tax purposes

Please tick either A. or B. and complete as appropriate.

A. ☐ I confirm that **I am** a U.S. citizen and/or resident in the U.S. for tax purposes and my U.S. federal taxpayer identifying number (U.S. TIN) is as follows:

_____

B. ☐ I confirm that **I am not** a U.S. citizen or resident in the U.S. for tax purposes.

10.3 Common Reporting Standard (CRS) Declaration of Tax Residency/Residencies including Citizenship and Residency by Investment disclosure.

Please indicate your country of tax residence (if resident in more than one country please detail **All** countries of tax residence **and All** associated tax identification numbers ("**TINs**")).

For further guidance on Tax Residence and TINs, please refer to the OECD CRS Information Portal http://www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/tax-identification- numbers/#d.en.347759

NOTE: Under the Irish legislation implementing the CRS, provision of a Tax ID number (TIN) is required to be provided unless:

- You are tax resident in a Jurisdiction that does not issue a (TIN), **or**
- You are tax resident **only** in a non-reportable Jurisdiction (i.e. Ireland or the USA)

Please list **ALL** Tax ID Numbers below

Country of Tax Residency	Tax ID Number (or TIN equivalent)	If TIN unavailable Select A, B or C (descriptions below)		
		A ☐	B ☐	C ☐
		A ☐	B ☐	C ☐
		A ☐	B ☐	C ☐

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

Reason B. The Account Holder is otherwise unable to obtain a TIN
(Please explain why you are unable to obtain a TIN)

_____

Reason C No TIN is required. (Note: Only select this reason if the domestic law of the relevant country/jurisdiction does not require the collection of the TIN issued by such country/jurisdiction)

Please tick this box to confirm you have specified **all jurisdictions** in which you are resident for tax purposes. ☐

10.3.1 Citizenship/Residency by Investment (CBI/RBI)

Citizenship by Investment (**CBI**) and Residency by Investment (**RBI**) schemes are offered by a number of jurisdictions and allow foreign individuals to obtain citizenship or temporary/permanent residency rights based on local investments or against a flat fee. In this regard, the OECD have identified specific jurisdictions that operate CBI/RBI schemes which could potentially pose a high-risk to the integrity of CRS.

If, in this *10.3*, you have confirmed that you are resident only in one or more of these specific jurisdictions (and not in any other jurisdiction), we are required to determine whether your citizenship/residency rights were obtained through a CBI/RBI scheme. If so, we must collect additional information.

For further details, including the list of jurisdictions and relevant CBI/RBI schemes, please refer to the OECD website:

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

Please select one of the following options:

Option A ☐

I confirm that I am either **not resident** or **not solely resident** in one or more of the jurisdictions designated by the OECD as operating a CBI/RBI scheme that may pose a high risk to CRS integrity.

(If you select this box, no further information is required in this section – please proceed to 10.4, if applicable.)

Option B ☐

I confirm that I am **solely resident** in one or more of the jurisdictions designated by the OECD as operating a CBI/RBI scheme that may pose a high risk to CRS integrity but **I did not** receive my residence rights under a CBI/RBI scheme.

(If you select this box, no further information is required in this section – please proceed to 10.4, if applicable.)

Option C ☐

I confirm that I am **solely resident** in one or more of the jurisdictions designated by the OECD as operating a CBI/RBI scheme that may pose a high risk to CRS integrity **and I solely obtained my residence rights** in these jurisdictions under one or more CBI/RBI schemes.

(If you select this box, please complete 11.3.2)

10.3.2 CBI/RBI additional queries where an Account holder or Controlling person has obtained citizenship or residency in an OECD CBI/RBI high risk jurisdiction.

*(Additional questions to be completed **ONLY** where option C above has been ticked).*

Do you hold residence rights in any other jurisdiction(s)? No ☐ Yes ☐

(If yes, list the jurisdiction(s))

Have you spent more than 90 days in any other jurisdiction(s) during the previous year? No ☐ Yes ☐

(If yes, list the jurisdiction(s))

In which jurisdiction(s) have you filed your personal income tax returns during the previous year?

(list the jurisdiction(s) below)

10.4 Type of Controlling Person

(ONLY to be completed by an individual who is a Controlling Person of an entity which is a Passive NFE or an Investment Entity located in a Non-Participating Jurisdiction and managed by another Financial Institution)

For Joint or multiple Controlling Person(s) please complete section *10.4.1* "*Additional account holders/controlling person identification (if required) Self-Certification for FATCA and CRS*" form for each Controlling Person.

Please tick all that apply

	Controlling Person of a Legal Person	Entity Name
☐	Controlling Person of a legal person – control by ownership	
☐	Controlling Person of a legal person – control by other means	
☐	Controlling Person of a legal person – senior managing official	

Please tick all that apply

	Controlling Person of a Trust	Entity Name
☐	Controlling Person of a trust - settlor	
☐	Controlling Person of a trust - trustee	
☐	Controlling Person of a trust - protector	
☐	Controlling Person of a trust - beneficiary	
☐	Controlling Person of a trust - other	

Please tick all that apply

	Controlling Person of a Legal Arrangement (Non-Trust)	Entity Name
☐	Controlling Person of a legal arrangement (non-trust) – settlor equivalent	
☐	Controlling Person of a legal arrangement (non-trust) – trustee equivalent	
☐	Controlling Person of a legal arrangement (non-trust) – protector equivalent	
☐	Controlling Person of a legal arrangement (non-trust) – beneficiary equivalent	
☐	Controlling Person of a legal arrangement (non-trust) – other equivalent	

10.4.1 Additional account holders / controlling person identification (if required)

Investor / Controlling Person Name			
Place and Date of Birth			
Place of Birth (town or city)			
Country of Birth		Date of Birth	
Current Residential Address			
House Name / Number			
Street			
City, Town, State, Province or County			
Postal Code		Country	
Mailing address (if different from above)			
House Name / Number			
Street			
City, Town, State, Province or County			
Postal Code		Country	

10.5 Declaration and undertakings

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

I acknowledge and consent to the fact that the information contained in this form and information regarding the Account Holder may be reported to the tax authorities of the country in which this account(s) is/are maintained and exchanged with tax authorities of another country or countries in which the Account Holder may be tax resident where those countries (or tax authorities in those countries) have entered into Agreements to exchange financial account information.

I undertake to advise the recipient promptly and provide an updated Self-Certification form within 30 days where any change in circumstances occurs which causes any of the information contained in this form to be incorrect

Data Protection - Customer Information Notice:

The Common Reporting Standard (**CRS**), formally referred to as the Standard for Automatic Exchange of Financial Account Information, is an information standard for the automatic exchange of information (**AEOI**), developed in the context of the Organisation for Economic Co-operation and Development (**OECD**).

The standard requires that Financial Institutions in participating jurisdictions gather certain information from account holders(and, in particular situations, also collect information in relation to relevant Controlling Persons of such account holders).

Under CRS account holder information (and, in particular situations, information in relation to relevant Controlling Persons of such account holders) is to be reported to the relevant tax authority where the account is held, which, if a different country to that in which the account holder resides, will be shared with the relevant tax authority of the account holder's resident country, if that is a CRS-participating jurisdiction.

Information that may be reported includes name, address, date of birth, place of birth, account balance, any payments including redemption and dividend/interest payments, Tax Residency(ies) and TIN(s).

Further information is available on the OECD website: http://oecd.org/tax/automatic-exchange/ And on the Irish Revenue website -https://www.revenue.ie/en/companies-and-charities/international- tax/aeoi/index.aspx

Authorised Signature	
Print Name	
Capacity (if Controlling Person)	
Date	

11. ENTITY SELF-CERTIFICATION

Account holders that are Individuals or Controlling Persons should not complete this form and should complete the form entitled "Individual (including Controlling Persons) Self-Certification for FATCA and CRS".

Instructions for completion and Data Protection notice.

We are obliged under Section 891E, Section 891F, and Section 891G of the Taxes Consolidation Act 1997 (as amended) and regulations made pursuant to those sections to collect certain information about each account holder's tax arrangements. Please complete the sections below as directed and provide any additional information that is requested. Please note that by completing this application form you are providing personal information, which may constitute personal data within the meaning of the General Data Protection Regulation (697/2016/EU) (the "**GDPR**") and applicable Irish data protection legislation (currently the Irish Data Protection Acts 1988 to 2018). Please note that in certain circumstances we may be legally obliged to share this information, and other financial information with respect to an account holder's interests in the Fund, with the Irish tax authorities, the Revenue Commissioners. They in turn may exchange this information, and other financial information with foreign tax authorities, including tax authorities located outside the EU.

If you have any questions about this form or defining the account holder's tax residency status, please speak to a tax adviser or local tax authority.

For further information and guidance on FATCA or CRS please refer to the Irish Revenue or OECD website at:
https://www.revenue.ie/en/companies-and-charities/international-tax/aeoi/index.aspx
http://www.oecd.org/tax/automatic-exchange/common-reporting-standard/ in the case of CRS only.

If any of the information below about the account holder's tax residence or FATCA/CRS classification changes in the future, please advise of these changes promptly.

(Mandatory fields are marked with an *)

11.1 Entity Account holder Details

*Account Holder Name (the "**Entity**"):	
*Country of Incorporation or Organisation :	

*Current (Resident or Registered) Address:

House Name / Number			
Street			
City, Town, State, Province or County			
Postal Code		Country	

Mailing address (if different from above)

House Name / Number			
Street			
City, Town, State, Province or County			
Postal Code		Country	

11.2 FATCA Declaration

Please tick **either** (a), (b) or (c) below **and** provide U.S TIN or exemption code as appropriate, and complete the appropriate sections below based on your FATCA classification.

A. ☐ Specified U.S Person - (also complete *11.4* and *11.5* below)

U.S Federal Taxpayer Identification

Number (TIN):

B. ☐ U.S Person but not a Specified U.S Person - (also complete *11.4* and *11.5* below)

W9 Exemption Code:

C. ☐ Not a Specified U.S Person - (also complete *11.3*, *11.4* and *11.5* below)

11.3 Entity's FATCA Classification

(the information provided in this section is for FATCA, please note your FATCA classification may differ from your CRS classification in 11.5).

Complete either Section *11.3.1* and *11.3.2* **OR** Section *11.3.3* **OR** Section *11.3.4*.

11.3.1 Financial Institutions under FATCA:

If the Entity is a Financial Institution, please **tick one** of the below categories and provide a GIIN at *11.3.2*; if not, complete section *11.3.3* to explain type of Entity you are and why a GIIN cannot be provided..

☐ Irish Financial Institution (FI) or other Partner Jurisdiction Financial Institution (FI)

☐ Registered Deemed Compliant Foreign Financial Institution

☐ Participating Foreign Financial Institution

11.3.2 Please provide the Entity's Global Intermediary Identification number (GIIN)

☐☐☐☐☐☐ ☐☐☐☐☐ ☐☐ ☐☐☐

11.3.3 If the Entity is a Financial Institution **but unable to provide a GIIN**, please explain by choosing one of the below reasons

The Entity has not yet obtained a GIIN but is sponsored by another entity which does have a GIIN. Please provide the sponsor's name and sponsor's GIIN.

Sponsor's Name:

Sponsor's GIIN:

☐ ☐☐☐☐☐☐ ☐☐☐☐☐ ☐☐ ☐☐☐

NOTE: This option is only available to Sponsored Investment Entities in Model 1 IGA jurisdictions. Sponsored Investment Entities that do not have U.S reportable accounts are not required to register and obtain a GIIN with the IRS unless and until reportable accounts are identified.

☐ **The Entity is an Exempt Beneficial Owner**

Please tick and confirm the category of Exempt Beneficial Owner;

- ☐ Government Entity
- ☐ International Organisation
- ☐ Foreign Central Bank
- ☐ Exempt Retirement Fund
- ☐ Collective Investment Vehicle Wholly Owned by Exempt Beneficial Owners.

☐ The Entity is a Certified Deemed Compliant Foreign Financial Institution (including a deemed compliant Financial Institution under Annex II of the IGA Agreement)

Indicate exemption:

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

☐ Entity is an Excepted Foreign Financial Institution

Indicate exemption:

☐ The Entity is a Trustee Documented Trust

Please also provide your Trustee's name and GIIN below

Trustee's Name:

Trustee's GIIN:

| | | | | | | | | | | | | | | | | | |

11.3.4 Non-Financial Institutions ("**NFFE**") under FATCA:

If the Entity is not a Financial Institution but a **Non-Financial Foreign Entity (NFFE)** , please confirm the Entity's FATCA classification by ticking **one** of the below categories;

☐ Active NFFE

☐ **Passive NFFE**

(Please confirm type of Passive NFFE that applies)

A ☐ Passive NFFE with **no** Controlling Persons that are specified U.S Persons.

B ☐ Passive NFEE with Controlling Persons that are specified U.S Persons.

(If this box is ticked, please also complete *11.6* for each of the Controlling Person(s) of the Entity and complete an "***Individual (Including Controlling Person(s) Self-certification for FATCA and CRS***" form for each Controlling Person(s) as outlined in *11.6.2*).

☐ Excepted NFFE

☐ Direct Reporting NFFE

Please provide your GIIN

| | | | | | | | | | | | | | | | | | |

11.4 Common Reporting Standard ("CRS") Declaration of Tax Residency (Note that Entities may have more than one country of Tax Residence)

Please indicate the Entity's country of tax residence for CRS purposes, (if resident in more than one country please detail all countries of tax residence and all associated tax identification numbers ("**TIN**")).

Please refer to the OECD CRS Web Portal for AEOI for more information on Tax Residence and TIN's. http://www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/tax-identification-numbers/#d.en.347759

If the Entity is not tax resident in any jurisdiction (e.g., because it is fiscally transparent), please indicate that below and provide its place of effective management or country in which its principal office is located.

NOTE: Under the Irish legislation implementing the CRS, provision of a Tax ID number (**TIN**) is required to be provided unless:

- You are tax resident in a Jurisdiction that does not issue a TIN; or
- You are tax resident only in a non-reportable Jurisdiction (i.e. Ireland or the USA)

Country of Tax Residency	Tax ID Number (TIN)	If TIN unavailable Select A, B or C (descriptions below)		
		A ☐	B ☐	C ☐
		A ☐	B ☐	C ☐
		A ☐	B ☐	C ☐

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

Reason B. The Account Holder is otherwise unable to obtain a TIN
(Please explain why you are unable to obtain a TIN)

_____

Reason C No TIN is required. (Note: Only select this reason if the domestic law of the relevant country/jurisdiction does not require the collection of the TIN issued by such country/jurisdiction)

Please tick this box to confirm you have specified **all jurisdictions** in which you are resident for tax purposes. ☐

11.5 Entity's CRS Classification

The information provided in this section is for CRS. (Please note an Entity's CRS classification may differ from its FATCA classification in Section 3 above). In addition, please note that the information that the Entity has to provide may differ depending on whether they are resident in a participating or non-participating CRS Jurisdiction. For more information on CRS to assist with classification, please see the OECD CRS Standard and associated commentary.

http://www.oecd.org/tax/automatic-exchange/common-reporting-standard/

11.5.1 Financial Institutions (FI's) under CRS

If the Entity is a *Financial Institution*, **Resident in either a Participating or Non-Participating CRS Jurisdiction** please review and tick **one** of the below categories that applies **and** specify the type of Financial Institution below.

Note: Please check the Irish Revenue AEOI portal at the time of completion of this form to confirm whether your country of Tax Jurisdiction is considered Participating or Non-Participating for the purposes of CRS Due-Diligence in Ireland.

https://www.revenue.ie/en/companies-and-charities/documents/aeoi/participating-jurisdictions.pdf

CRS Financial Institution Type

☐ A reporting Financial Institution resident in a **participating CRS Jurisdiction**
(including an Investment Entity, Depository FI, Custodial Institution, Specified Insurance company)

A Financial Institution resident in a **Non-Participating CRS Jurisdiction**
(Please also tick the type of FI that applies)

☐ FI- Investment Entity resident in a Non-Participating Jurisdiction and **is managed** by another Financial Institution (If this box is ticked, also **complete** ***11.6*** **below** and provide separate individual self-certification forms from each of the Controlling Persons)

☐ FI- Investment Entity resident in a Non-Participating Jurisdiction but is **not managed** by another Financial Institution/ Other Financial Institution (including a Depository Financial Institution, Custodial Institution or Specified Insurance Company **resident in a non-participating jurisdiction**).

Non-Reporting Financial Institution under CRS.
(Specify the type of **non-reporting FI** below)

☐ Governmental Entity

☐ International Organisation

☐ Central Bank

☐ Broad Participation Retirement Fund

☐ Narrow Participation Retirement Fund

☐ Pension Fund of a Governmental Entity, International Organisation, or Central Bank

☐ Exempt Collective Investment Vehicle

☐ Trust *(Who's trustee reports all required information with respect to all CRS reportable accounts)*

☐ Qualified Credit Card Issuer

☐ Qualified Non-Profit Entity

☐ Other Entity *(Defined under the domestic law as low risk of being used to evade tax)*

Specify the type provided in the domestic law: _____

11.5.2 Non-Financial Entity ("**NFE**") under CRS:

If the Entity is a **not defined as a Financial Institution under CRS** then please tick one of the below categories confirming if you are an Active NFE **or** Passive NFE.

Active Non-Financial Entity (NFE)
(Choose the box that applies)

☐ (i) **Active NFE** – a corporation the stock of which is regularly traded on an established securities market
Please provide details of the established securities market on which the corporation is regularly traded

_____

☐ (ii) **Active NFE** – if you are a Related Entity of a regularly traded corporation.
Please provide the name of the regularly traded corporation of which the Entity is a Related Entity

_____

And provide details of the securities market on which the corporation is regularly traded

_____

☐ (iii) **Active NFE** – a Government Entity or Central Bank

_____

☐ (iv) **Active NFE** – an International Organisation

_____

☐ (v) **Active NFE** – other than those listed in (i), (ii), (iii) or (iv) above. (for example a start-up or certain types of non-profit NFE's

_____

Or

Passive Non-Financial Entity (NFE)

☐ (vi) **Passive NFE** - If this box is ticked please also complete *11.6* for each of the Controlling Person(s) of the Entity and provide separate AEOI "*Individual (including Controlling Persons) Self-Certification for CRS and FATCA form*" as indicated in section *11.6* for each Controlling Person(s).

_____

11.6 Controlling persons

NB: Please note that each Controlling Person must complete a **separate** "*Individual (including Controlling Persons) FATCA and CRS Self-Certification*" form.

If there are no natural person(s) who exercise control of the Entity, then the Controlling Person for CRS purposes will be the natural person(s) who hold the position of **senior managing official of the Entity**.

For further information on Identification requirements under CRS for Controlling Persons, see the Commentary to Section VIII of the CRS Standard. http://www.oecd.org/tax/automatic-exchange/common-reporting-standard/

11.6.1 Controlling Person(s) of the Account Holder:

If you have ticked a Passive NFE with Controlling Persons in **either the FATCA or CRS Classification sections above** or *An Investment Entity* resident in a *Non-Participating Jurisdiction* and managed by another *Financial Institution* in the CRS section, then you must also complete this section for each of the Controlling Person(s) of the account holder and provide a separate "*Individual (including Controlling Persons) FATCA and CRS Self-Certificat*ion" form for each Controlling person as per *11.6.2* below:

Indicate the name of all Controlling Person(s) of the Account Holder:

_____

_____

Note: In case of a trust, Controlling Persons means the settlor(s), the trustee(s), the protector(s) (if any), the beneficiary(ies) or class(es) of beneficiary(ies), **AND** any other natural person(s) exercising ultimate effective control over the trust.

With respect to an Entity that is a legal person, if there are no natural person(s) who exercise control over the Entity, then the Controlling Person for CRS purposes will be the natural person who holds the position of senior managing official of the Entity.

11.6.2 Arrange for each of the Controlling Persons listed in Section 6.1 to complete a separate "*Individual (including Controlling Persons) Self-Certification for FATCA and CRS*" form for each Controlling Person listed in *11.6.1.*

11.7 Declaration and undertaking

I/We declare (as an authorised signatory of the Entity) that the information provided in this form is, to the best of my/our knowledge and belief, accurate and complete.

I/We confirm (where applicable) that an "*Individual (including Controlling Persons) Self-Certification for FATCA and CRS*" form has been completed, signed and provided for **each Controlling person**, as defined under the CRS and FATCA regulations.

I/We acknowledge and consent to the fact that the information contained in this form and information regarding the Account Holder may be reported to the tax authorities of the country in which this account(s) is/are maintained and exchanged with tax authorities of another country or countries in which the Account Holder may be tax resident where those countries (or tax authorities in those countries) have entered into Agreements to exchange financial account information.

I/We on behalf of the Entity undertake to advise the recipient promptly and provide an updated Self-Certification form within 30 days where any change in circumstance (for guidance refer to Irish Revenue or OECD website) occurs which causes any of the information contained in this form to be incorrect.

Authorised Signature	
Print Name	
Capacity in which Declaration is made	
Date	

12. DISCLOSURE STATEMENTS

1. I/We confirm that I am/we are 18 years of age or over and I am/We are of full legal age and capacity.

2. I/We, having received and considered a copy of the current Prospectus, any relevant supplements thereto, the most recent annual and/or semi-annual report of the Company (if any) and where relevant the UCITS KIID or the PRIIP KID (each as defined below) hereby confirm and declare that this application is based solely on the information contained in such documentation and is made pursuant to the terms of this Application Form.

3. I/We* hereby acknowledge that I/we* have been offered the choice of receiving the Prospectus and the relevant key information document relating to the relevant Fund (comprising either (i) a key information document prepared in accordance with Regulation 1286/2104 ("**PRIIPs Regulation**") or a key investor information document prepared in accordance with the European Communities (Undertakings for Collective Investment in Transferable Securities) Regulations 2011, as amended) ("**UCITS Regulations**") as applicable (each a "**Key Information Document**") on paper or in electronic form by means of a website and hereby specifically consent to receiving the Key Information Document in electronic form by way of accessing the latest version of the document online at stonehagefleming.com/investments/funds# (or such other website address as may be notified to me/us from time to time)

4. I/We* hereby represent that I/we* have regular access to the internet. The Key Information Document is available at stonehagefleming.com/investments/funds# and I/we* hereby confirm that I/we* have also been notified electronically of this website address and the place on the website where the Key Investor Document can be accessed.

5. I/We* hereby acknowledge that I/we* have received or accessed by electronic means the Key Investor Document. I/We* hereby also confirm that I/we* will access the relevant Key Investor Document by electronic means before making any subsequent and/or future subscriptions for Shares in any share class and/or Fund.

6. Where I/we* are investing as nominee, I/we* shall provide my/our* client(s) with the Key Information Document issued in respect of the relevant share class and I/we* shall ensure that I/we* do so in compliance with the requirements set down in the PRIIPs Regulation or the UCITS Regulations as applicable, as both may be amended, updated or supplemented from time to time and any other applicable laws in any jurisdiction in carrying out this activity. I/We* shall maintain records of my/our* provision of the Key Investor Document to my/our* clients and shall furnish such records to the Company, or its delegates, upon request.

7. If I am/we are acting as agent, representative or nominee for the account of a third party (the "**Beneficial Owner**"), I/we acknowledge and agree that the agreements, representations and warranties made by me/us herein are also made for and on behalf of the Beneficial Owner to the fullest extent possible.

8. I/We hereby acknowledge that by signing and submitting this Application Form, I/we will be applying irrevocably for Shares in the selected Fund subject to the terms of the Prospectus and the Supplement applicable to such Fund and the Articles of the Company as may be amended from time to time.

9. Requests for redemption or distribution payments to be made by telegraphic transfer will be subject to bank charges. Such charges will normally be payable by the Shareholder/Unitholder although the Company has the discretion to determine that these charges should be borne by the Company or the relevant Fund.

10. I/We agree that the issue and allotment to me/us of the Shares is subject to the provisions of the Prospectus, that subscription for Shares will be governed and construed in accordance with Irish law

11. I/We hereby declare that the Shares will not be held in violation of any applicable laws.

12. I/We hereby confirm that I/we shall be deemed to make, on a continuing basis, each of the statements contained herein unless I/we notify you to the contrary in relation to any Shares I/we may hold or obtain at any time.

13. I/We certify that I am a/we are eligible to invest in the Company and I am/we are not acquiring Shares for or on behalf of, or for the benefit of, any person or entity who/which is not eligible to invest in the Company nor do I/we intend transferring any Shares which I/we may purchase to any person or entity who/which is not eligible to invest in the Company. I/We confirm that I/we are aware of the risks involved in the proposed investment and of the fact that inherent in such investment is the potential to lose the entire sum invested.

14. Please complete either Option A **or** Option B

☐ **Option A**

By ticking the box below, the Applicant (or any person or entity on whose behalf Shares in the Company are being acquired) confirms that they do not constitute any of the following:

- Russian national
- Natural person residing in Russia
- Legal person, entity or body established in Russia
- Legal person, entity or body which is owned by a Russian national or a natural person residing in Russia
- Belarusian national
- Natural person residing in Belarus
- Legal person, entity or body established in Belarus;
- Legal person, entity or body which is owned by a Belarusian national or a natural person residing in Belarus

☐ **Option B**

By ticking the box below, the Applicant (or any person or entity on whose behalf Shares in the Company are being acquired) confirms that they constitute one of the following:

- Russian national or a natural person residing in Russia who is a national of an EEA Member State or Switzerland or who has a temporary or permanent residence permit in an EEA Member State or Switzerland;
- Belarusian national or a natural person residing in Belarus who is a national of an EU Member State or Switzerland or who has a temporary or permanent residence permit in an EU Member State or Switzerland;

This information is being gathered by the Company in order to comply with applicable obligations imposed on it under Article 5f of Council Regulation (EU) 833/2014 as amended and Article 1(y) of Regulation (EC) No 765/2006 as amended.

15. I/We agree to notify the Company or the Administrator immediately if I/we become aware that any of the representations, declarations or warranties given by me/us in this Application Form is/are no longer accurate and complete in all respects and agree immediately to take such action as the Company may direct, including where appropriate, redemption of my/our entire holding.

16. I/We agree to indemnify and hold harmless the Company, the Depositary, the Manager, the Investment Manager the Administrator and the other Shareholders on its own behalf and as agent of the Company and agree to keep the Company, the Depositary, the Manager, the Investment Manager, the Administrator and the other Shareholders indemnified against any loss, liability, cost or expense of any nature whatsoever arising (including without limitation legal fees, taxes and penalties), to any of them as a result, directly or indirectly, of any breach of any of the representations, warranties, conditions, covenants, agreements or declarations given by me/us in this Application Form.

17. I/We agree to indemnify the Company, the Administrator, the Investment Manager, the Manager and the Depositary and their delegates for any loss suffered by them as a result of me/us holding Shares in the Company in contravention of restrictions imposed by the Directors or, by virtue of my/our holding, being in breach of the laws and regulations of any applicable jurisdiction (for example, by reason of the Company becoming liable in the relevant jurisdiction of me/us) or where my/our holding could, in the opinion of the Directors, cause the Company to incur any liability to taxation or to suffer any pecuniary disadvantage which it or the other Shareholders or any or all of them might not otherwise have incurred or sustained or otherwise in circumstances which the Directors believe might be prejudicial to the interests of the Shareholders.

18. I/We agree to indemnify and keep indemnified the Company, the Investment Manager and the Manager against loss arising to the Company by reason of the Company, the Investment Manager or the Manager becoming liable to account for tax on the happening of an event giving rise to such taxation.

19. I/We hereby warrant that I/we have such knowledge and experience in business and financial matters or have obtained advice from a professional adviser such that I am/we are aware and capable of evaluating the merits, and the risks, of an investment by me/us in the Company. I/We am aware of the risks inherent in investing in the assets in which the Company will invest, as set out in the Prospectus and the method by which these assets will be held and/or traded, and can bear the loss of my/our entire investment in the Company.

20. I/We understand that the tax disclosure set forth in the Prospectus is of a general nature and may not cover the jurisdiction in which I am /we are subject to taxation and that the tax consequences of my/our purchase of Shares depend on my/our individual circumstances.

21. I/We acknowledge the right of the Company or the Manager or the Administrator on its behalf at any time to require the mandatory redemption of Shares in the circumstances provided for in the Prospectus.

22. Either:

☐ I am/we are not a U.S. Person(s) (as identified in the prospectus):

☐ I/We hereby certify that the Shares are not being acquired for the benefit of, directly or indirectly, any U.S. Person nor in violation of any applicable law, and that I/we will not, subject to the conditions set forth in the Prospectus, sell or offer to sell or transfer Shares in the United States or to or for the benefit of a U.S. Persons; or

☐ I am/we are a U.S. Person(s) (as defined in the Prospectus) and have completed the Application Form for applicants who are U.S. Persons

23. In particular: (a) I/we understand that the Company has not been and will not be registered under the United States Investment Company Act of 1940, as amended, that the Shares have not been registered and will not be registered under the United States Securities Act of 1933, as amended, and that the Shares have not been qualified under the securities laws of any state of the United States and may not be offered, sold or transferred in the United States or to or for the benefit of, directly or indirectly, any U.S. Person; (b) I am not/none of us is a U.S. Person; and (c) I am not/none of us is acquiring the Shares for the account or benefit, directly or indirectly, of any U.S. Person or with a view to their offer, sale or transfer within the United States or to or for the account or benefit, directly or indirectly, of any U.S. Person.

If I/We hold Shares on behalf of a U.S. Taxpayer (as defined below) then I/we understand the U.S. tax consequences of such an investment. I/We agree to provide the Company with such additional tax information as it may from time to time request.

*"**U.S. Taxpayer**" is defined to include a U.S. citizen or resident alien of the United States (as defined for United States federal income tax purposes); any entity treated as a partnership or corporation for U.S. tax purposes that is created or organised in, or under the laws of, the United States or any state thereof (including the District of Colombia); any other partnership that is treated as a U.S. Taxpayer under U.S. Treasury Department regulations; any estate, the income of which is subject to U.S. income taxation regardless of source; and any trust over whose administration a court within the United States has primary supervision and all substantial decisions of which are under the control of one or more U.S. fiduciaries. Persons who have lost their U.S. citizenship and who live outside the United States may nonetheless, in some circumstances, be treated as U.S. Taxpayers.

An investor may be a "**U.S. Taxpayer**" but not a "**U.S. Person**". For example, an individual who is a U.S. citizen residing outside of the United States is not a "U.S. Person" but is a "**U.S. Taxpayer**".

24. I/We declare that the entity hereby subscribing for Shares is neither a Benefit Plan Investor nor investing on behalf of or with any assets of a Benefit Plan Investor as defined below. (Benefit Plan Investors should contact the Company.) "Benefit Plan Investor" is used as defined in U.S. Department of Labor ("**DOL**") Regulation § 2510.3-101(f)(2), and includes (i) any employee benefit plan (as defined in Section 3(3) of the Employee Retirement Income Security Act of 1974, as amended ("**ERISA**")), whether or not such plan is subject to Title I of ERISA (which includes both U.S. and non-U.S. plans, plans of governmental entities as well as private employers, church plans, and certain assets held in connection with nonqualified deferred compensation

plans); (ii) any plan described in Section 4975(e)(1) of the Internal Revenue Code of 1986, as amended, (the "**Code**") (which includes a trust described in Code Section 401(a)) which forms a part of a plan, which trust or plan is exempt from tax under Code Section 501(a), a plan described in Code Section 403(a), an individual retirement account described in Code Section 408 or 408A or an individual retirement annuity described in Code Section 408(b), a medical savings account described in Code Section 220(d) and an education savings account described in Code Section 530); and (iii) any entity whose underlying assets include plan assets by reason of a plan's investment in the entity (generally because 25 per cent. or more of a class of interests in the entity is owned by plans). Benefit Plan Investors also include that portion of any insurance company's general account assets that are considered "plan assets" and (except if the entity is an investment company registered under the 1940 Act) the assets of any insurance company separate account or bank common or collective trust in which plans invest.

25. If I am/we are a commodity pool, my/our investment is directed by an entity which (i) is not required to be registered in any capacity with the CFTC or to be a member of the National Futures Association ("**NFA**"), (ii) is exempt from registration or (iii) is duly registered with the CFTC in an appropriate capacity or capacities and is a member in good standing of the NFA.

26. Investment Company Representations:

    I/We certify that I/We believe one of the following statements to be true:

    I am/We are neither an investment company required to be registered under the Investment Company Act of 1940, as amended (the "**1940 Act**"), nor an issuer that, but for an exception from the definition of "investment company" under the 1940 Act, would be an investment company; or

    I am/We are an investment company subject to registration or would be an investment company but for an exception under the 1940 Act.

    Investment companies with U.S. Person beneficial owners must contact the Administrator.

27. I/We, if not a natural person, am/are duly organised, validly existing and in good standing under the laws of the jurisdiction in which I am/we are organised and I/we have the power and authority to enter into and perform my/our obligations under this Application Form.

28. I am/we are able to bear the economic risk of an investment in the Shares, including, without limitation, the risk of loss of all or a part of my/our investment. I/we do not have an overall commitment to investments which are not readily marketable that is disproportionate to my/our net worth, and my/our investment in the Shares will not cause such overall commitment to be excessive.

29. I/We hereby confirm that the Administrator, the Manager and the Company and any agents authorised by the Administrator, the Manager, or the Company from time to time, are each hereby authorised and instructed to accept and execute any instructions in respect of the Shares to which this application relates given by me/us in written form or by facsimile. I/We hereby agree to indemnify each of the Administrator, the Manager and the Company, on its own behalf and as agent of the Company and agree to keep each of them indemnified against any loss of any nature whatsoever arising as a result of any of them acting upon facsimile instructions. The Administrator, the Manager and the Company may rely conclusively upon and shall incur no liability in respect of any action taken upon any notice, consent, request, instruction or other instrument believed in good faith to be genuine or to be signed by properly authorised persons.

30. I/We acknowledge that due to anti-money laundering and counter-terrorist financing requirements operating within Ireland, the Administrator, the Company and/or the Manager will require anti-money laundering documentation (AML Documentation) including proof of identity before the application can be processed and shares can be allotted. Subscription applications will not be accepted (and any subscription monies received will be returned less interest/charges) if the identification of the Applicant and/or its beneficial owners[5] (as applicable) has not been completed and/or if all relevant AML Documentation and other documentation has not been received. The Administrator, the Company, the Manager and the Company shall be held harmless and

[5] *A "**beneficial owner**" for a corporate entity is an individual who directly or indirectly hold ownership of 25% or more of the shares or voting rights in an entity, or control of the entity. In cases where shareholder(s) are entities with 25% or more ownership or control, please provide the details of Individual(s) who hold beneficial ownership 25% or more. For Trusts or similar arrangements, beneficial owners include the beneficiaries, the settlor, the trustee(s) and the protector (if any). The beneficiaries are the individuals benefiting from the trust or similar legal arrangement.*

indemnified against any loss arising as a result of a failure to process the application for Shares and/or allot Shares, or a delay in processing any redemption or distribution requests, if any such information requested by the Administrator, the Manager or the Company has not been provided by me/us or has been provided in incomplete form.

31. I/We further warrant and represents that the amounts used to purchase Shares were not and are not directly or indirectly derived from activities that may contravene applicable laws and regulations, including anti-money laundering and counter terrorist financing laws and regulations.

32. The Subscriber declares that neither it, nor any of its beneficial owners[6] is a politically exposed person ("**PEP**")[7], an immediate family member of a PEP or close associate of such a PEP. The Subscriber further agrees to (1) notify the Company and/or the Administrator as soon as practicable if it or any of its beneficial owners is identified as a PEP or an immediate family member, or a close associate of a PEP; and (2) provide the Company and/or the Administrator with any additional documentation that it or they may require from time to time in accordance with current anti-money laundering and counter terrorist financing legislation where it or any of its beneficial owners is identified as a PEP or an immediate family member, or a close associate of a PEP during the course of the business relationship, is established or residing in a high-risk jurisdiction[8] or is otherwise classified as high-risk[9]. Furthermore, the Subscriber hereby acknowledges that the Company or the Administrator will apply enhanced due diligence if it or any of its beneficial owners is deemed to be politically exposed, is established or residing in a high-risk jurisdiction or is otherwise classified as high-risk.

33. I/We acknowledge that any failure to provide complete identification and verification documentation at the account opening stage and/or upon request at any other stage during the course of the business relationship will result in my/our account being blocked for both redemptions and distribution payments pending receipt of the outstanding documentation. I/We acknowledge that I/we may be classified as a non-compliant investor. I/We hereby hold the Manager, the Administrator and the Company harmless and indemnify them against any loss arising as a result of a failure to process any transaction/ make any redemption or distribution payment, if such information has been required and has not been provided by me/us. I/We acknowledge that the Company and/or the Administrator, and/or the Manager have the right to discontinue the business relationship with me/us upon my/our being classified as a non-compliant investor or a non-compliant legacy investor.

34. The Subscriber hereby undertakes to provide information to the Company or the Administrator as may be required for the establishment and maintenance of the Company's beneficial ownership register in accordance with the Beneficial Ownership Regulations (as modified by the European Union (Modifications of Statutory Instrument No. 110 of 2019) (Registration of Beneficial Ownership of Certain Financial Vehicles Regulations 2020) (S.I. No. 233 of 2020)) as may be amended from time to time (the "**Beneficial Ownership Regulations**"). The Subscriber hereby consents to the publication of such information in accordance with the requirements of the Beneficial Ownership Regulations.

---

*[6] A "**beneficial owner**" for a corporate entity is an individual who directly or indirectly hold ownership of 25% or more of the shares or voting rights in an entity, or control of the entity. In cases where shareholder(s) are entities with 25% or more ownership or control, please provide the details of Individual(s) who hold beneficial ownership 25% or more. For Trusts or similar arrangements, beneficial owners include the beneficiaries, the settlor, the trustee(s) and the protector (if any). The beneficiaries are the individuals benefiting from the trust or similar legal arrangement.*

*[7] A "**politically exposed person**" is defined as an individual who is, or has been in the preceding 12 months, a person with a prominent public function, including either of the following individuals (but not including any middle ranking or more junior official);*
(a) a specified official;
(b) a member of the administrative, management or supervisory body of a state-owned enterprise;
(c) any individual performing a prescribed function.

*A "**specified official**" is further defined as any of the following officials (including any such officials in an institution of the European Communities or an international body);*
(a) a head of state, head of government, government minister or deputy or assistant government minister;
(b) a member of a parliament;
(c) a member of a supreme court, constitutional court or other high level judicial body whose decisions, other than in exceptional circumstances, are not subject to further appeal;
(d) a member of a court of auditors or of the board of a central bank;
(e) an ambassador, charge d'affairs or high ranking officer in the armed forces;
(f) a director, deputy director or member of the board of, or person performing the equivalent function in relation to, an international organisation.

*[8] The Fourth Money Laundering Directive defines "**high-risk third country**" as a jurisdiction identified by the European Commission in accordance with Article 9.*

[9] Section 39 of Acts requires Designated Persons to apply additional customer due diligence measures where the Designated Person has reasonable grounds to believe that there is a higher risk of money laundering or terrorist financing.

35. I/We will comply with such beneficial ownership notices issued by the Company and/or the Administrator, and/or the Manager seeking beneficial ownership information concerning the applicant/ investor as required in accordance with current anti-money laundering and counter terrorist financing legislation. I/We understand that it is an offence where I/We fail to comply with such beneficial ownership notices or where I/We make a false statement in respect of same. I/We understand that where I am /we are a beneficial owner of the Company, I/we must notify the Company where the Company's beneficial ownership register does not contain my/our details and where I/we have not received a beneficial ownership notice from the Company and/or the Administrator.

36. I/We acknowledge that the Company and/or its authorised agent may redeem any Shares owned directly or beneficially by any person or persons where any declarations or information is outstanding (including inter alia, any declarations or information required pursuant to anti-money laundering or counter terrorist financing requirements or reporting requirements imposed by any reporting regime (including but not limited to FATCA and/or CRS (FATCA and CRS have the meaning assigned to them below).

37. I/We understand and agree that the Company prohibits the investment of funds by any persons or entities, directly or indirectly, that is (i) the subject of any sanctions programs administered by the United States (including, without limitation, the Department of the Treasury's Office of Foreign Assets Control and the U.S. Department of State), the European Union and any of its member states, the United Nations Security Council, and any other relevant sanctions authority ("**Sanctions Authority**"), including initial and ongoing screening against sanctions-related lists administered by EU, US OFAC and the UN ("**Sanctions Lists**") or (ii) is otherwise the subject of economic, trade, or financial sanctions, requirements, or embargoes imposed, administered, or enforced from time to time by the EU, US OFAC and the UN; or is (iii) a foreign shell bank[10]. (such persons or entities in (i)-(iii) collectively referred to as "**Prohibited Persons**").

38. I/We represent, warrant and covenant that: (i) I/we are not, nor is any person or entity controlling, controlled by or under common control with me/us, a Prohibited Person, and (ii) to the extent I/we have any beneficial owners, (A) I/we have carried out thorough due diligence to establish the identities of such beneficial owners, (B) based on such due diligence, I/we reasonably believe that no such controllers/beneficial owners are Prohibited Persons, (C) I/we hold the evidence of such identities and status and will maintain all such evidence for at least five years from the date of my/our complete redemption from the Company, and (D) I/we will make available such information and any additional information that the Company may require upon request in accordance with applicable regulations.

39. The Subscriber acknowledges that, if the Subscriber, or any controller or Underlying Beneficial Owner is or becomes named on, or blocked by, any "**Sanctions List**" or "**watch list**" (referred to in any of the representations and warranties above), or if the Administrator and/or the Company and/or the Manager are otherwise required by law, the Administrator and/or the Company and/or the Manager may freeze its investment, by prohibiting additional investments, declining redemption / distribution requests and/or segregating assets constituting the investment in accordance with applicable law and/or regulations, or the Subscriber may be required to redeem from the Company. In such event, the Subscriber shall indemnify the Administrator and/or the Company and/or the Manager, and hold each of them harmless, against any resulting loss.

40. The Company may also be required to report such action and to disclose the Subscriber's or the underlying beneficial owner's identity or provide other information with respect to the Subscriber to the Irish police authorities and/or the Irish tax authorities, OFAC, the Central Bank of Ireland or other governmental entities.

41. I/We acknowledge that due to the changing nature of anti-money laundering laws and regulations and the possible extensions of applicable rules, the Company and the Administrator may update and amend its procedures from time to time to comply with such amendments.

42. I/We acknowledge that the Company, the Administrator and/or the Manager (as applicable) also reserve the right to refuse to make any redemption payment or distribution to a Shareholder if the Company, the Administrator or the Manager suspects or is advised that the payment of any redemption or distribution

---

[10] *A "**Foreign shell bank**" means a foreign bank without a physical presence in any country, but does not include a regulated affiliate. A post office box or electronic address would not be considered a physical presence. A regulated affiliate means a foreign shell bank that: (1) is an affiliate of a depository institution, credit union, or foreign bank that maintains a physical presence in the United States or a foreign country, as applicable; and (2) is subject to supervision by a banking authority in the country regulating such affiliated depository institution, credit union, or foreign bank*

moneys to such Shareholder might result in a breach or violation of any applicable anti-money laundering or counter terrorist financing or other laws or regulations by any person in any relevant jurisdiction, or such refusal is considered necessary or appropriate to ensure the compliance by the Administrator, the Company and/or the Manager with any such laws or regulations in any relevant jurisdictions.

43. I/We understand and agree that any redemption proceeds paid to me/us will only be paid to a bank account in our name and with a recognised financial institution.

44. I/We, request that the Shares issued pursuant to this application are registered in the name of and address of the Applicant as outlined above. I/We hereby agree to indemnify and hold harmless the Administrator, the Company, the Manager, the Depositary, the Investment Manager and their delegates, agents or affiliates against any loss, liability, damage, penalty, fee cost or expense (including without limitation legal fees, taxes and penalties) which may result directly or indirectly from (i) any inaccuracy in or breach of any representation, warranty, covenant or agreement set forth in this section; and/or (ii) any failure by me/us to provide information or from any information which I/we provide being incorrect or ceasing to be correct in accordance with this Application Form.

45. I/We agree to provide to the Company and/or the Manager and/or the Administrator at such times as each of them may request such declarations, certificates or documents as each of them may require in connection with this investment. Should any information furnished to any of them become inaccurate or incomplete in any way, I/We hereby agree to notify the Company and/or the Manager and/or the Administrator immediately of any such change and further agree to request the redemption of Shares in respect which such confirmations have become incomplete or inaccurate where requested to do so by the Company and/or the Manager and/or the Administrator. I/we agree to notify the Company and/or the Manager and/or the Administrator of any change to my/our tax residency status.

46. I/We hereby accept such lesser number of Shares, if any, than may be specified above in respect of which this application may be accepted.

47. In respect of joint applicants only, we direct that on the death of one of us the Shares for which we hereby apply be held in the name of and to the order of the survivor or survivors of us or the executor or administrator of the last of such survivor or survivors.

48. I/We confirm that I/we have been made aware of and have read in detail the Data Protection Notice / Data Privacy Notice appended to this Application Form as *Appendix A*. I/We acknowledge that this document provides an outline of my/our data protection rights and the Company's data protection obligations as they relate to my/our investment in the Company. I/We shall promptly provide the Privacy Statement to (i) each individual whose personal data I/We have provided or will provide to the Company or any of its delegates (including, without limitation, the Manager, the Investment Manager and / or the Administrator) in connection with my/our investment in the Company (such as a directors, trustees, employees, representatives, shareholders, investors, clients, beneficial owners or agents) and (ii) any other individual connected to me/us as may be requested by the Company or any of its delegates (including, without limitation, the Manager, the Investment Manager and / or the Administrator). I/We shall also promptly provide to any such individual, on request by the Company or any of its delegates, any updated versions of the Privacy Statement and the privacy notice (or other data protection disclosures) of any third party to which the Company or any of its delegates has directly or indirectly provided that individual's personal data.

49. In accordance with the provisions of the Data Protection Acts 1988 to 2018 (as may be amended or supplemented from time to time), the EU's General Data Protection Regulations 2016/679 (the "**GDPR**" and together with the Data Protection Acts 1988 to 2018, the "**Data Protection Legislation**"), I/we acknowledge and are informed that personal data given in this Application Form (or otherwise provided in connection with an application to subscribe for Shares in a Fund, on application or at any other time, including without limitation my/our name, age, contact details, bank account details, transactions and the invested amount, and any information regarding the dealing in Shares (subscription, conversion, redemption and transfer) (the "**Personal Data**"), will be collected, recorded, stored, adapted, transferred and processed, by electronic means or otherwise, by the Company as a "**data controller**" under the Data Protection Legislation, and as further described in the Company's data privacy statement, which is set out in *Appendix C* hereto and is otherwise available upon request.

50. I/We represent and warrant that all Personal Data provided to the Company or its delegates (including, without limitation, the Manager, the Investment Manager and / or the Administrator) by us or on our behalf has been and will be provided in accordance with Data Protection Legislation. I/We shall ensure that any Personal Data that I/We provide to the Company or its delegates (including, without limitation, the Manager, the Investment Manager and / or the Administrator) is accurate and up to date, and that I / We shall promptly notify the Company if I/We become aware that any such data is no longer accurate or up to date.

51. I/We acknowledge that the Company intends to take such steps as may be required to satisfy any obligations imposed by Council Directive (EU) 2018/822 (amending Directive 2011/16/EU), as applied in Ireland by means of the relevant Irish tax legislation ("**DAC6**"). I/We further acknowledge that this may, in specific circumstances, require the Company or any party that falls to be considered an "**intermediary**" for the purposes of DAC6 to exchange certain of my/our information (including details of my/our investment in the Company) to the Irish Revenue Commissioners and other relevant tax authorities. I/We hereby agree to the transmission of such data by the relevant party to the Irish Revenue Commissioners and/or other relevant tax authorities, as is required to comply with DAC6.

52. In order for the Company to comply with the above DAC6 obligations, I/we agree to provide to the Company, Administrator or any party that falls to be considered an "**intermediary**" for the purposes of DAC6 for a particular transaction, any necessary information at such times as each of them may request and furthermore provide any supporting certificates or documents as each of them may reasonably require in connection with this investment by reason of DAC6.

53. I/We further acknowledge that a failure to comply with the foregoing obligations or failure to provide the necessary information required may result in the compulsory redemption of our entire holding in the Company, and that the Company, the Manager, the Depositary and/or the Administrator are authorised to hold back from redemption proceeds or other distributions to me/us such amount as is sufficient after the deduction of any redemption charges to discharge any such liability and I/we shall indemnify and keep indemnified the Company, the Manager, the Investment Manager, the Depositary and the Administrator against any loss suffered by them or other Shareholders in the Company in connection with any obligation or liability to so deduct, withhold or account.

54. I/We acknowledge that redemptions/distributions will not be processed on non-cleared/verified accounts.

55. In addition to the Tax Information, I/We agree to promptly provide, and periodically update, at any times requested by the Administrator with any information (or verification thereof) the Administrator deems necessary for the Company to comply with tax reporting requirements, FATCA and/or CRS (including any imposed by any inter-governmental agreement (IGA) or any legislation, law, regulation or other official guidance in relation to any IGA on the implementation of FATCA or CRS). This may include such information as is required to evidence the Company's (or any accountholder in the Company's) status for FATCA or CRS purposes, including (not limited to) whether the Company is a financial institution, or whether its account holders are US persons for purposes of FATCA, or what the account holder's country of tax residence for purposes of CRS.

56. We represent and warrant the completeness and accuracy of any information (as at the date of submission) and authorise the Company, the Investment Manager, the Manager and the Administrator to act upon such information in good faith, including, but not limited to, disclosing or submitting such information to the Irish tax authorities. I/We agree to waive any provision of foreign law that would, absent such a waiver, prevent compliance with such requirements. The Company shall have no obligation to carry out any investigation with respect to the truth, accuracy or completeness of any information provided by us and I/We will, on demand, hold the Company, the Manager and the Investment Manager harmless from any liability resulting from the my/our failure to provide complete and accurate Information.

57. I/We hereby acknowledge that if I/we fail to provide any information on a timely basis, I/We may be subject to 30% U.S. withholding tax on the investor's share of "**withholdable payments**" (as defined for purposes of FATCA) received by the Company.

58. I/We hereby acknowledge that if I/we fail to provide any information and such failure results in the Company being unable to comply with FATCA, any IGA or CRS, the Company may exercise its right to completely redeem an applicant (at any time upon any or no notice). I/We further acknowledge and agree to indemnify the

Manager, the Investment Manager, the Company and its other investors for any losses resulting from our failure to meet its obligations under this Section, including any U.S. withholding tax imposed on the Company.

59. I/We hereby acknowledge that any notice or document may be served by the Company, the Manager or Administrator on me/us in the manner specified from time to time in the Prospectus and, for the purposes of the Electronic Commerce Act 2000, if I/We have provided an e-mail address or fax number to the Company or its delegate, I/We consent to any such notice or document being sent to me/us by fax or electronically to the fax number or e-mail address previously identified to the Company or its delegate which I/We acknowledge constitutes effective receipt by me/us of the relevant notice or document. I/We acknowledge that I/We am/are not obliged to accept electronic communication and may at any time choose to revoke my/our agreement to receive communications by fax or electronically by notifying the Company or its delegate in writing at the above address, provided that my/our agreement to receive communications by fax or electronically shall remain in full force and effect pending receipt by the Company or its delegate of written notice of such revocation.

60. I/we acknowledge that my / our subscription monies/ redemption monies / dividend monies will be paid into an Umbrella Cash Account. Further, that such monies will be treated as an asset of the relevant Fund and I/we will not benefit from the application of any investor money protection rules (i.e. the monies will not be held on trust as investor monies for me/us) and that I/we will be an unsecured creditor of the relevant Fund (i) with respect to the amount subscribed for Shares and held in the relevant Umbrella Cash Account until such Shares are issued to me/us as of the relevant Dealing Day or (ii) with respect to the redemption/dividend amount to be paid and held in the relevant Umbrella Cash Account until such amount is paid to me/us (whichever is applicable).

61. I/we acknowledge that if I/we fail to submit the necessary anti money-laundering and terrorist financing requirements documentation requested by the Company, the Manager or its delegates redemption / dividend monies will be held in the relevant Umbrella Cash Account and shall remain an asset of the relevant Fund and I/we will not benefit from the application of any investor money protection rules (i.e. the redemption /dividend monies will not be held on trust for me/us). In such circumstances, I/we acknowledge that I/we will be unsecured creditor of the relevant Fund in respect of such redemption / dividend monies until such time as the relevant documentation required by the Company, the Manager or its delegate has been received to its satisfaction and the redemption /dividend monies have been paid to me/us.

62. In the event that Shares are allotted / issued notwithstanding that cleared funds have not been received within the usual time limits as set out in the Prospectus, I/we acknowledge that the Company or the Administrator on its behalf may cancel the allotment/issue of my/our Shares and I/we will be liable to pay to the Company interest at such rate as may be determined by the Company from time to time and/or other losses, charges or expenses suffered or incurred by the Company, the Depositary or their delegates as a result of late payment or non-payment by me/us of subscription monies.

12.1 Terms and Conditions of Service for instructions issued to the Administrator via email

12.1.1 Introduction

If you (hereinafter referred to as the "**Investor**") wish to send Northern Trust International Fund Administration Services (Ireland) Limited, (the "**Administrator**"), instructions in respect of the Shares of a Fund (the "**Fund**"), being a sub-fund of the Company in portable document format ("**PDF**") or commonly used equivalent scanned form which is transmitted to the Administrator via email, then the terms as set out below will apply to the Investor's account.

IT IS IMPORTANT THAT THE INVESTOR READS THESE TERMS AND CONDITIONS OF SERVICE CAREFULLY.

By completing the appropriate documentation (e.g. original subscription forms, additional subscription forms, transfer/switch requests or redemption forms) and instructing the Administrator in respect of the Shares of the Fund via email, the Investor will have accepted the following Terms and Conditions of Service.

12.1.2 Procedure for PDF Instructions

(a) The email address to submit PDF instructions StonehageTAInstructions@ntrs.com This address is to be solely used for sending PDF instructions via email in respect of the shares in the Fund.

(b) The Investor shall ensure that the PDF instruction is signed by properly authorised persons, scanned and attached to a blank email which is addressed to mailto:StonehageTAInstructions@ntrs.com

(c) Please ensure that the Investor blank e-mail does not contain any text or non-text items including but not limited to logos.

(d) Each blank e-mail sent to the email address specified above may only include one PDF file attachment. However, the single PDF file attachment may contain multiple instructions in relation to Shares in more than one Sub-Fund. A blank e-mail with multiple PDF attachments will be rejected by the Administrator.

(e) PDF instructions received without the scanned PDF form attached will not be accepted.

(f) Upon receipt of an email with the scanned PDF instruction, the Administrator will send the Investor a task number by auto-response.

(i) The task number acknowledges receipt of the Investor's instruction.

(ii) The task number is not confirmation of placement of the instruction.

(iii) The Administrator must be in receipt of the instruction prior to the relevant dealing deadline as set out in the Fund's Prospectus. The Administrator will not be responsible for any delays in receipt.

(g) If the Investor does not receive a task number by auto response, it is the Investor's responsibility to contact the Administrator by telephone (details confirmed within the application form) to confirm that the Administrator has received the Investor's instruction.

(h) If the Investor sends the Administrator a PDF dealing instruction in respect of the shares in the Fund to a mailbox other than specified above, the Administrator will reject the instruction and/or the deal will not be placed. Notification of rejection may not be given prior to the dealing cut off.

(i) In cases where the Investor has supplied the Administrator with a "**group**" email address, the Administrator will have fully discharged its responsibilities where it has sent any communication to this "**group**" address.

(j) The Investor should not send a duplicate instruction by alternative means to the Administrator as this could lead to a duplicate e.g. deals being placed in error.

(k) The Investor is not obliged to instruct in this manner.

12.1.3 General Terms and Conditions of Service:

(a) Email is not a secure form of communication and may be subject to interception, interruption, corruption, distortion, non-delivery, loss, may not be confidential, secure or error free and may contain viruses. Using and relying on email involves increased risk of fraud and of miscommunications including those due to a telecommunications system or equipment failure, misdirected communications or illegibility of the instructions or documents and the Investor will bear the risks if the Investor wishes to conduct the Investor's dealings using email.

(b) The Administrator is authorised and instructed to accept and execute any instructions in respect of shares in the Fund given by the Investor in PDF form or by email. The Administrator will rely conclusively upon, and none of the Company, the Manager or the Administrator shall incur liability in respect of any action taken upon any instruction believed in good faith to be genuine.

(c) None of the Company the Manager or the Administrator will be responsible or liable for the authenticity of instructions received from the Investor or any authorised person and may rely upon any instruction from any such person representing himself to be a duly authorised person reasonably believed by the Administrator to be genuine.

(d) None of the Company, the Manager or the Administrator will accept responsibility or liability of any nature whatsoever arising out of or in connection with instructions given by the Investor in PDF form or by email, including without limitation, the Investor's use of an incorrect email address, failure of the Investor's transmission, interception, alteration or corruption of the Investor's email transmission, non-receipt of the Investor's electronic instruction, failure of technical infrastructure, error, omission, interruption, deletion, defect, delay in operation or transmission, computer virus, communication line failure, or any allotment, switch or redemption or other action taken in good faith by the Administrator upon any electronic instruction. In addition, none of the Company, the Manager or the Administrator will be liable for any failure to act upon electronic instructions due to equipment failure or for any cause that is beyond the control of the Administrator.

13. ANTI-MONEY LAUNDERING DUE DILIGENCE INFORMATION

Anti-Money Laundering (AML) due diligence requirements in accordance with The Criminal Justice (Money Laundering and Terrorist Financing) Acts 2010 – 2021.

Guide to completing due diligence.

Part I – To be completed by all applicants.

Part II – To be completed by all applicants.

Appendix A – All applicants to provide AML due diligence documentation outlined in *Appendix A* (as per investor type) in order to establish the identity of an investor and verify same to the extent warranted by risk. **AML documents must be provided in advance before an account can be opened.**

13.1.1 Due Diligence Information - Purpose of the Investment

Part I

Part I (a) to be completed only by natural persons and legal persons investing in their own name for their own benefit. Institutional investors and legal entities investing as part of their normal economic activity of investing in their own name for the benefit of one or more third parties must tick Part I (b). This information is required to meet our AML obligations under the current AML legislation in Ireland and will be used solely for those purposes.

(a) What is the expected annual subscription to the Company _____

How frequent do you expect to trade in the Fund (please tick):

Once-Off Subscription ☐

Once a: Month ☐ Year ☐ Quarter ☐

If more frequently than the options provided, please provide an estimate of frequency: _____

Please indicate the term of your investment (please tick): 3-5 years ☐ 5-10 years ☐ 10+ years ☐

Natural Persons only:

Source of Wealth (activities that generated total net worth): _____

**Source of Wealth means seeking to discover the activities that have generated the total net worth of the customer that are involved in the investment. Examples of appropriate and reasonable corroboration of source of wealth are information and documents such as information from public domain, evidence of title, copies of trust deeds, audited accounts or tax returns.*

Source of Funds (activity that generated transaction funding): _____

**Source of funds means seeking to discover the origin and the means of transfer for funds that are involved in a specific transaction. Confirmation of Source of Funds therefore requires NT to seek confirmation of the bank account from which funds were generated as well as the activity that generated the funds subscribed (e.g. salary payments, sale of shares etc.).*

(b) Institutional investor/ legal entity investing as part of their normal economic activity of investing in their own name for the benefit of one or more third parties. If no, see Part 1 (a). Yes ☐ No ☐

13.1.2 Due Diligence Documentation- Investor Type

Part II

Please tick investor type below (please note, investor type indicates the documents/ confirmations required to open account as per *Appendix A*):

Private/ Unlisted Company	☐	Charities	☐
Partnership	☐	Trusts/ Foundations	☐
Listed Company	☐	Collective Investment Scheme/Fund	☐
Subsidiary of a Listed Company	☐	School, college or university	☐
Regulated Credit or Financial Institution	☐	Pension Schemes	☐
Nominee Company	☐	Trade Unions	☐
Government Body or Public Authority	☐	Church	☐
Individual	☐	Other- Please specify:	☐

Occupation/Business Activity: _____

If you, or any beneficial owners, are a Politically Exposed Person. Yes ☐

*A Politically Exposed Person ('**PEP**') means an individual (or family member or close associate of such individual) who is, or has, at any time in the preceding 12 months, been entrusted with a prominent public function (e.g. this can include but not limited to: head of state/ government, government / deputy minister, member of parliament, senior official of a political party or member of the supreme court).* No ☐

If the application form is signed under power of attorney, a copy of the power of attorney must be furnished in support of the signature along with due diligence in line with legal type.

13.1.3 Due Diligence Documentation - Leverage across investments

I hereby authorize the Administrator to leverage the due diligence documentation provided for the purposes of compliance with applicable regulatory requirements across all investments which I currently hold/ may hold in the future across all funds which are administered by the Administrator. Yes ☐ No ☐

13.1.4 Due Diligence Documentation- Ultimate Beneficial Owner

Please complete the relevant section to your entity type. The Ultimate Beneficial Owner section must be completed. Non-completion could delay acceptance of subscription.

All Entities

Ultimate Beneficial Owners are individuals who directly or indirectly hold ownership of 25% or more of the shares or voting rights in an entity, or control of the entity. (including through Bearer Shareholdings). Where there is no person identified as beneficial owner, the natural person(s) who hold the position of senior managing official(s)/director(s) will be deemed the beneficial owners. Where the beneficial owner is the senior managing official, verify the identity of that person.

* In cases where shareholder(s) are entities with 25% or more ownership or control, please provide the details of Individual(s) who hold beneficial ownership 25% or more. For Trusts or similar arrangements, Ultimate Beneficial Owners include the beneficiaries, the settlor, the trustee(s) and the protector (if any). The beneficiaries are the individuals benefiting from the trust or similar legal arrangement.

Please complete the below regarding Ultimate Beneficial Owner(s):

Name	Address	Nationality	Date of Birth

Note: If there is/ are no Individual(s) with a beneficial interest of 25% or more (either directly or indirectly) of the shares or voting rights of the entity, or anyone that otherwise exercises control of the entity (where applicable), please check the box and insert applicable senior managing official(s) below whom will be deemed the UBO:

Name	Address	Nationality	Date of Birth

13.1.5 Related Person Detail

Full names of all Related Persons:

- In the case of natural persons, Related Persons means any person authorised to act on behalf of the investor
- In the case of a company, Related Persons means the directors.
- In the case of a Partnership, Related Persons means the partners.
- In the case of a Limited Liability Company (**LLC**), Related Persons means the managing members.
- In the case of a trust, foundation or similar legal arrangement, Related Persons means the trustees.
- In the case of a charity/government body/ university/ school/ college/ club/ society, Related Persons means the authorising officers/ board members/ officials.

Please complete the below:

Name	Address	Nationality	Date of Birth

Declaration - I/We declare that the information contained in this form and the attached documentation, if any, is true and accurate to the best of my/our knowledge and belief.

Please note that the administrator no longer requires original documentation.

Where a signature is required, instructions must be provided by an authorised signatory or signatories.

Signature 1		Print Name		Date	
Signature 1		Print Name		Date	

14. SIGNATURE

* declare that the information contained in this form and any attached documentation is true and accurate to the best of * knowledge and belief.

* declare that have read and fully understand all terms, representations, and conditions in this form.

(* delete as applicable).

Applicant / Authorised Signatory Name	
Capacity of Authorised Signatory (if applicable)	
Signature	
Date	

Applicant / Authorised Signatory Name	
Capacity of Authorised Signatory (if applicable)	
Signature	
Date	

Applicant / Authorised Signatory Name	
Capacity of Authorised Signatory (if applicable)	
Signature	
Date	

Applicant / Authorised Signatory Name	
Capacity of Authorised Signatory (if applicable)	
Signature	
Date	

IMPORTANT:

To be valid Application Forms must be signed by each Applicant and received by the Administrator. In the case of a legal entity, Applications Forms should be executed under seal or signed by duly authorised signatories provided that a copy of the authorised signatories list together with sample signatures and details of any signing protocol accompanies the Application Form. If this Application Form is signed under power of attorney such power of attorney or a copy thereof must accompany it. The right is reserved to reject any Application Form in whole or in part or to seek such further information as the Company may require to satisfy itself in regard to the identity and legal capacity of any Applicant.

15. BENEFICIAL OWNER DETAILS

Individuals and joint account holders are not required to complete the below section.

☐ We confirm there is a natural person(s) who is a beneficial owner of the investor. (Please complete *15.1* below of this declaration).

☐ We confirm there is no natural person(s) who is a beneficial owner of the investor. (Please list the senior managing official(s) in *15.2* of this declaration).

15.1 Natural person(s) who is a beneficial owner

BENEFICIAL OWNER 1

Full Name			
Identification number		Date of Birth	
Place of Birth		Nationality	
Occupation:			
Percentage of ownership %			
Registered Address			
City, Town, State, Province or County			
Postal Code		Country	

BENEFICIAL OWNER 2

Full Name			
Identification number		Date of Birth	
Place of Birth		Nationality	
Occupation:			
Percentage of ownership %			
Registered Address			
City, Town, State, Province or County			
Postal Code		Country	

BENEFICIAL OWNER 3

Full Name			
Identification number		Date of Birth	
Place of Birth		Nationality	
Occupation:			
Percentage of ownership %			
Registered Address			
City, Town, State, Province or County			
Postal Code		Country	

15.2 No Natural person(s) who is a beneficial owner of the investor (No Individual owns directly/indirectly >25%)

In the event where no natural person falls under the above scenario, the senior managing official(s) (e.g. Chief Executive Officer, Chief Financial Officer, Chief Operating Officer, Managing Member, General Partner, President or any other individual who regularly performs similar functions) of the subscribing entity will be recorded as the Beneficial Owner (not any underlying customer of the entity / designation).

In completing the below, we confirm we have read and understood the definition at *15.2.1* and we have provided below details of a senior manager(s) who should be recorded as the Beneficial Owner(s).

Senior managing official details (please complete in block capitals):

If required, please add additional natural person(s) who are beneficial owners on a separate sheet

SENIOR MANAGING OFFICIAL 1			
Full Name			
Identification number		Date of Birth	
Place of Birth		Nationality	
Occupation:			
Percentage of ownership %			
Registered Address			
City, Town, State, Province or County			
Postal Code		Country	

SENIOR MANAGING OFFICIAL 2			
Full Name			
Identification number		Date of Birth	
Place of Birth		Nationality	
Occupation:			
Percentage of ownership %			
Registered Address			
City, Town, State, Province or County			
Postal Code		Country	

Yours faithfully,

[Capacity of signatory – Money Laundering Reporting Officer / Head of Compliance / Head of Risk / Director / Other]
For and on behalf of
[Regulated Entity]

15.2.1 Definition of a Beneficial Owner:

Beneficial Owner: A Beneficial Owner is any individual who ultimately owns or controls an investor or on whose behalf a transaction is conducted.

(a) Beneficial Owner, in relation to a body corporate which is not a company whose securities are listed on a Regulated Market is any individual who ultimately owns or controls, whether through direct or indirect ownership or control (including through Bearer Shareholdings), 25% or more of the shares or voting rights of the body corporate or through control via other means.

Beneficial owner, in relation to a body corporate:

(i) A shareholding of 25% or more or an ownership interest of 25% or more in the customer held by a natural person shall be an indication of direct ownership.

(ii) (ii) A shareholding of 25% or more or an ownership interest of 25% or more in the customer held by a corporate entity, which is under the control of a natural person(s), or by multiple corporate entities, which are under the control of the same natural person(s), shall be an indication of indirect ownership.

(b) Beneficial Owner, in relation to a partnership (other than a limited liability partnership), means any individual who:

(i) ultimately is entitled to or controls, whether the entitlement or control is direct or indirect, 25% or more of the share of the capital or profits of the partnership or 25% or more of the voting rights in the partnership; or

(ii) controls the partnership.

(c) Beneficial Owner, in relation to a trust, means all of the following:

(i) the settlor;

(ii) the trustees;

(iii) any individual who is determined as being entitled to a vested interest in possession, remainder or reversion, whether or not the interest is defeasible, in the capital of the trust property (a beneficiary);

(iv) in the case of a trust other than one that is set up or operates entirely for the benefit of individuals referred to in the paragraph relating to body corporates above, (v) the class of individuals in whose main interest the trust is set up or operates; or any individual (including the settlor, protector or trustees) who has control over the trust. In addition to the measures required in relation to a customer and a beneficial owner, in the case of beneficiaries of trusts or of similar legal arrangements that are designated by particular characteristics or class, a designated person shall obtain sufficient information concerning the beneficiary to satisfy the designated person that it will be able to establish the identity of the beneficiary at the time of the pay out or at the time of the exercise by the beneficiary of its vested rights."

(d) Beneficial Owner, in relation to a foundation or other legal arrangement similar to a trust, means those individuals who hold equivalent or similar positions to those set out above.

(e) Beneficial Owner, in relation to the estate of a deceased person where the estate is in the course of administration, means the executor or administrator of the estate concerned

(f) Beneficial Owner in relation to a legal entity or legal arrangement, that does not fall within the above definitions, means:

(i) If the individuals who benefit from the entity or arrangement have been determined, any individual who benefits from the property of the entity or arrangement;

(ii) If the individuals who benefit from the entity or arrangement have yet to be determined, the class of such individuals in whose main interest the entity or arrangement is set up or operates;

(iii) Any individual who exercises control over the property of the entity or arrangement; and

(iv) Any individual holding a position, in relation to the legal entity or legal arrangement that is similar or equivalent to the position specified in relation to a trust.

(g) Beneficial Owner, in any other case, means the individual who ultimately owns or controls the entity or arrangement or on whose behalf a transaction is being conducted.

(h) NTIFASIL will consider persons who may exercise 'control through other means' (where identified) as per EBA Guidelines;

(i) control without direct ownership, for example through close family relationships, or historical or contractual associations;

(ii) using, enjoying or benefiting from the assets owned by the customer;

(iii) responsibility for strategic decisions that fundamentally affect the business practices or general direction of a legal person.

Identification of beneficial owners means the individual name. Verification (as warranted by the degree of risk) may for a beneficial owner include date of birth, nationality and residential address.

APPENDIX A ANTI-MONEY LAUNDERING REQUIREMENTS

Outlined below is guidance on the documentation which the Company/Manager & Northern Trust (as Administrator) will require when undertaking due diligence to establish the identity of an investor and verify same to the extent warranted by risk. **AML documents must be provided in advance before an account can be opened.**

The Fund/ICAV/ Manager & Northern Trust (as Administrator) hereby reserves the right to request such further information and/or documentation from investors as is necessary from time to time to satisfy Irish regulatory requirements.

A.1 Examples of Photographic Identity Documentation

- Current passport.
- Current driving licence.
- Current national identity card.
- Identity document with photographic identity issued by a government department.

A.2 Examples of Proof of Address

- Bank statements/credit card statements.
- Utility bill.
- Mobile phone bill
- Household/motor insurance certificate and renewal notices.
- Correspondence from local authorities.
- Correspondence from the revenue commissioners or equivalent.
- Correspondence from any government body.
- Driving licence which confirms the address provided it has not also been used to satisfy the photographic identity requirement above.
- Payslip or salary advice dated within the previous 6 months.
- Confirmation of address from a lawyer or financial institution.

Note 1: All documentation must reflect the current residential address and must be dated within the previous 6 months other than in the case of an official document known to be issued only or typically at fixed intervals of more than 6 months, in which case such document may be accepted during that period, to a maximum of 12 months (e.g. correspondence from local authorities).

Note 2: In the case of an elderly individual investor residing in a residential home, then written confirmation from the residential home, (identified as being in existence), that the individual is residing there will be deemed sufficient.

Note 3: The photograph on the proof of identity should be clear

A.3 English Translations

Where due diligence documents are provided in a language other than English, the prospective investor should, at the same time, provide a relevant extract translated by an independent source confirming also the adequacy of the foreign language documents.

A.4 Letter of Assurance

Please contact Northern Trust for a Section 40/ Reliance template letter of assurance if required.

For Unregulated Nominees (of a regulated parent) or Regulated Financial Intermediary investors, please see templates below.

Note: Investors are required to notify the Company/Manager & Northern Trust of any changes to the AML information which was previously provided (e.g. changes in directors/controllers or beneficial owners).

A.5 Country Risk Ratings

NTIFASIL applies enhanced due diligence to investors located in a country identified as a high risk third country by the EU.

A.6 Regulated Credit or Financial Institution

Where the applicant is a Regulated Credit or Financial Institution in an Equivalent Jurisdiction, please provide the following:

- Proof of regulation.
- A letter of assurance from the Regulated Credit or Financial Institution.
- Identify any beneficial owner entitled to 25% or more (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the entity. Where there is no beneficial owner entitled to 25% or more, then the natural person(s) who hold the position of director(s) of the entity must be identified (along with address, date of birth and nationality).
- Evidence of UBO Registration on the Beneficial Ownership Register (EU investors only).

Where the applicant is a Regulated Credit or Financial Institution but is not regulated in an Equivalent Jurisdiction, please provide the following:

- Full name of the company
- Registered number of the company
- Registered office address & principal business address of the company,
- Details of directors of the company and verify the identity of two directors, or where applicable, one director and one authorised signatory.
- Identify and verify any beneficial owner beneficially entitled to 25% or more (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the entity. Where there is no beneficial owner entitled to 25% or more, the natural person(s) who hold the position of senior managing official(s)/director(s) of the entity must be identified.
- Confirmation of source of wealth & source of funds. In general email confirmation or completion of the relevant section of the app form will suffice.
- Evidence of UBO registration on the Beneficial Ownership Register (EU investors only)

  Note: Where the beneficial owner is a corporate entity, Northern Trust requires details of ultimate beneficial owners (this can be demonstrated through an Organisation chart signed by an authorised signatory or shareholder register or other company documentation etc. **reflecting** the direct and/ or indirect **ownership and control structure).**

- Confirmation as to whether the company is investing on its own behalf or on behalf of underlying investors; and (as applicable) identify and verify any beneficial owner entitled to 25% or more of the investment.

Note: Where the beneficial owner of the investment or the company is deemed high risk per NT risk rating requirements, the identity should be verified in line with its legal form.

- Verification of identity of the company from:
  - Extract from the relevant company registry; or
  - Copy of the Certificate of Incorporation or equivalent of the company; or
  - Copy of the Memorandum and Articles of Association or equivalent of the company; or
  - Copy of the latest audited financial statements of the company.

A.6.1 Where the applicant is domiciled in a high risk jurisdiction, the following is also required

- Identify and verify the identity of any beneficial owner beneficially entitled to 10% or more (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the company. Where there is no beneficial owner entitled to 10% or more, the natural person(s) who hold the position of senior managing official(s)/ director(s) of the entity must be identified and verified.
- Due diligence Questionnaire (incl. SOW/SOF for investor and UBO).
- Confirmation as to whether the company is investing on its own behalf or on behalf of underlying investors and (as applicable) identify and verify the identity of any beneficial owner entitled to 10% or more of the investment.

A.7 Nominee Company

Where the applicant is a Regulated Nominee Company from an Equivalent Jurisdiction, please provide the following:

- Proof of regulation.
- A letter of assurance from the regulated nominee company
- Identification and verification (to the extent warranted by risk) of beneficial ownership for the financial intermediary/nominee (ensuring that where no natural person is identifiable who ultimately owns or controls the financial intermediary/nominee, the Company may consider the senior managing official(s) to be the beneficial owner(s)).
- Evidence of UBO Registration on the Beneficial Ownership Register (EU investors only).

Where the applicant is 1) **not** directly regulated and 2) a wholly owned subsidiary of a regulated parent entity (in an Equivalent Jurisdiction), please provide the following:

- Identification and verification of the financial intermediary/nominee entity, in accordance with the Company's identification and verification requirements per legal form of that entity.
- Identification and verification (to the extent warranted by risk) of underlying investor(s) as the beneficial owner(s) of the funds invested.
- Authorised Signatory List
- Evidence of UBO Registration on the Beneficial Ownership Register (EU investors only).
- Confirmation as to whether the company is investing on its own behalf or on behalf of underlying investors.
- Confirmation of source of wealth & source of funds. In general email confirmation or completion of the relevant section of the app form will suffice.

Where the applicant is domiciled in a high risk jurisdiction, the following is also required:

- Identification and verification of the financial intermediary/nominee entity, in accordance identification and verification requirements per legal form of that entity;
- Identification and verification of underlying investor(s) as the beneficial owner(s) of the funds invested.
- Due Diligence Questionnaire (incl. SOW/SOF for investor and UBO).
- Confirmation as to whether the company is investing on its own behalf or on behalf of underlying investors and (as applicable) identify and verify the identity of any beneficial owner entitled 10% or more of the investment.

A.8 Listed Company

Where the applicant is a Listed Company on a regulated market (e.g. a regulated market that subjects companies, whose securities are admitted to trading, to disclosure obligations which are consistent with the Legislation of the European Communities), please provide the following:

- Please provide proof of listing on an equivalent market.
- Entity name
- Company registration number
- Registered office address
- Principle Business address

Where the applicant is not a Listed Company on a regulated market, please provide the following:

- Proof of listing of the company.
- Full name of the company.
- Registered number of the company.
- Registered office address & principal business address of the company.
- Details of directors to include name, address, date of birth
- Identify and verify any beneficial owner beneficially entitled to 25% or more.
- Identify and verify two senior managing officials (usually directors)
- Receive confirmation as to whether the company is investing on its own behalf or on behalf of underlying investors.
- Confirmation of source of wealth & source of funds. In general email confirmation or completion of the relevant section of the app form will suffice.

Note: Where the beneficial owner of the investment or the company is deemed high risk, the identity should be verified in line with its legal form.

- In addition to proof of listing on a stock market obtain one of the following:
  - Search of the relevant company registry; or
  - Copy of Certificate of Incorporation or equivalent; or
  - Copy of Memorandum and Articles of Association or equivalent; or
  - Copy of latest audited financial statements.

Note: Where the beneficial owner of the investment or the company is deemed high risk per NT risk rating requirements, the identity should be verified in line with its legal form

Where the applicant is domiciled in a high risk jurisdiction, the following is also required:

- Proof of listing of the company
- Full name of the company.
- Registered number of the company.
- Registered office and principal business address of the company.
- Certificate of Incorporation or Equivalent.
- Copy of Memorandum and Articles of Association.
- Latest audited financial statement.
- Details of directors of the company: Name, address, date of birth
- Identify and verify two directors
- Identify and verify the identity of any beneficial owner beneficially entitled to 10% or more (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the entity.
- Due diligence Questionnaire (incl. SOW/SOF for investor and UBO)
- Receive confirmation as to whether the company is investing on its own behalf or on behalf of underlying investors and (as applicable) identify and verify the identity of any beneficial owner entitled to 10% or more of the investment

A.9 Subsidiary of a Listed Company

Where the applicant is a Subsidiary of a Listed Company on a regulated market (e.g. a regulated market that subjects companies, whose securities are admitted to trading, to disclosure obligations which are consistent with the Legislation of the European Communities), please provide the following:

- Proof of listing for the parent
- Legal name of the entity.
- Evidence of ownership by the listed company.
- Identify the natural person(s) who hold the position of senior managing official(s)/ director(s) of the entity (along with address, date of birth and nationality).
- Evidence of UBO Registration on the Beneficial Ownership Register (EU investors only).

Where the parent company is not a Listed Company on a regulated market, please provide the following:

- Legal name of the entity
- Registered number of the subsidiary company.
- Registered office address & principal business address of the subsidiary company.
- Proof of listing of the parent company
- Independent evidence of ownership by the company listed on a stock market.
- Name, address and date of birth for all directors of the subsidiary company..
- Verify two directors.
- Identify and verify any beneficial owner beneficially entitled to 25% or more (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the entity.

- Confirmation of source of wealth & source of funds. In general email confirmation or completion of the relevant section of the app form will suffice.
- Evidence of UBO Registration on the Beneficial Ownership Register (EU investors only)

Note: Where the beneficial owner is a corporate entity, Northern Trust requires details of ultimate beneficial owners (this can be demonstrated through an Organisation chart signed by an authorised signatory or shareholder register or other company documentation etc. reflecting the ownership and control structure).

- Receive confirmation as to whether the company is investing on its own behalf or on behalf of underlying investors and (as applicable) identify and verify any beneficial owner entitled to 25% or more of the investment.

Note: Where the beneficial owner of the investment or the subsidiary company is deemed high risk, the identity should be verified in line with its legal form.

- Verification of identity of the company from:
  - Extract from the relevant company registry or
  - Copy of the Certificate of Incorporation or equivalent of the company; or
  - Copy of the Memorandum and Articles of Association or equivalent of the company; or
  - Copy of the latest audited financial statements of the company.

Where the applicant is domiciled in a high risk jurisdiction, the following is also required:

- Identify and verify the identity of any beneficial owner beneficially entitled to 10% or more (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the company. Where there is no beneficial owner entitled to 10% or more, the natural person(s) who hold the position of senior managing official(s)/ director(s) of the entity must be identified and verified.
- Due Diligence Questionnaire (incl. SOW/SOF for investor and UBO)
- Confirmation as to whether the company is investing on its own behalf or on behalf of underlying investors and (as applicable) identify and verify the identity of any beneficial owner entitled to 10% or more of the investment.

A.10 Government / Public Body

Where the applicant is a Government/ Public Body in Ireland, please provide the following:

- Appropriate background information sourced from a reliable source (e.g. copy of the legal instrument establishing the government body/public authority and listing the names of key officials).
- Entity legal name
- Nature and status of entity
- Registered office address of the entity
- Name of the home state authority and nature of its relationship with public body.
- Ownership/Gov. Dept. accountable for the entity.
- Name of main public body officials/directors (or equivalent)

Where the applicant is not a Government Body or Public Authority in Ireland, please provide the following:

- Full name of the government body or public authority.
- Nature and status of the government body or public authority.

- Registered office address.
- Name of the home state of the public authority and details of the nature of its relationship with the public authority.
- Evidence of ownership of the public authority.
- Names of the main officials of the government body or public authority and where the country is deemed medium risk by Northern Trust verify the identity of two officials or, where applicable, one official and one authorised signatory.
- Appropriate background information on the government body or public authority.
- Ownership/Gov. Dept. accountable for the entity.
- Confirmation of source of wealth & source of funds. In general email confirmation or completion of the relevant section of the app form will suffice.

Where the applicant is domiciled in a high risk jurisdiction, the following is also required:

- Identify and verify the identity the position of senior managing official(s) of the entity and evidence of authorisation to act on the customer's behalf.
- Certified copy of the audited financial statements of the government body or public authority.
- Due Diligence Questionnaire (incl. SOW/SOF for investor).

A.11 Pension Scheme

Where the applicant is an Employee/Superannuation or similar scheme in an Equivalent Jurisdiction, please provide the following confirmations

- Confirmation that the Employee/Superannuation (or similar scheme) provides for retirement benefits to employees.
- Confirmation that contributions of the Employee/Superannuation scheme are made by deduction from wages.
- Confirmation that the rules of the Employee/ Superannuation scheme do not permit a member's interest under the scheme to be re-assigned.

Note: The above can be confirmed through constitutional documentation of the scheme or through receipt of written confirmation from the trustees of the scheme.

Alternatively,

- Listed by EIOPA or equivalent - HMRC Cert obtained from the investor satisfies this requirement for UK based pensions

-OR-

- Obtain Trust Deed or equivalent which confirms that the entity is a pension or similar scheme which provide retirement benefits to employees
- Identify any beneficial owner beneficially entitled to 25% or more (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the entity.
- Where there is no beneficial owner entitled to 25% or more the natural person(s) who hold the position of senior managing official(s)/ director(s) of the entity must be identified.

Where the applicant is not an Employee/ Superannuation or similar scheme in an Equivalent Jurisdiction, please provide the following:

- Full name of the pension scheme.
- Registered office address of the pension scheme
- Confirmation of listing by EIOPA or equivalent HMRC Cert obtained from the investor satisfies this requirement for UK based pensions.
- Identify controllers/trustees/ directors/
- Verify two trustees/directors/controllers
- Constitutional/Formation Document (e.g. Trust Deed)
- Identify and verify any beneficial owner beneficially entitled to 25% or more (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the entity.
- Confirmation of source of wealth & source of funds. In general email confirmation or completion of the relevant section of the app form will suffice.

Where the applicant is domiciled in a high risk jurisdiction, the following is also required:

- Identify and verify the identity of the scheme administrator and entity carrying out AML/CTF controls on scheme investors (per legal form); or
- Receive written confirmation from the entity carrying out AML/CTF controls similar to that requested from a regulated third party undertaking due diligence.
- Identify any beneficial owner beneficially entitled to 10% or more (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the entity. Where there is no beneficial owner entitled to 10% or more, the natural person(s) who hold the position of senior managing official(s)/director(s) of the entity must be identified and verified.
- Due Diligence Questionnaire (incl. SOW/SOF for investor and UBO)

Collective Investment Scheme

Where the applicant is a Collective Investment Scheme ("**CIS**") regulated as a designated person or listed on a regulated financial market in an Equivalent Jurisdiction, please provide the following:

- Please provide proof of regulation/ listing.
- Full name of the CIS.
- Registered address of the CIS.
- Prospectus or equivalent.
- Name and address of scheme promoter.
- Name and address of scheme administrator.
- Name and address of entity carrying out anti-money laundering checks upon the scheme investors and evidence that the entity is regulated for AML purposes.
- Identify any investors (beneficial owners) who own 25% or more (directly or indirectly) of the share capital.
- Identify SMOs
- Beneficial Owner Form
- AML Comfort letter from the entity carrying out AML checks whom NTIFASIL is entitled to place reliance on
- Evidence of UBO Registration on the Beneficial Ownership Register (EU investors only).

Where the CIS is not either listed on a regulated financial market or regulated as a designated person in an Equivalent Jurisdiction, please provide the following:

- Full name of the CIS.
- Registered address of the CIS.
- Prospectus or equivalent.
- Name and address of the scheme promoter.
- Name and address of the scheme administrator.
- Name and address of the entity carrying out anti-money laundering checks upon the scheme investors and evidence that this entity is regulated for AML purposes. Identify and verify any investors (beneficial owners) who own 25% or more (directly or indirectly) of the share capital.
- Where there is no beneficial owner entitled to 25% or more, the natural person(s) who hold the position of senior managing official(s)/ director(s) of the entity (investor) must be identified and verified.
- Confirmation of source of wealth & source of funds. In general email confirmation or completion of the relevant section of the app form will suffice
- AML Comfort letter from the entity carrying out AML checks whom NTIFASIL is entitled to place reliance on
- Evidence of UBO Registration on the Beneficial Ownership Register (EU investors only).

Note: Where the beneficial owner is deemed high risk per NT risk rating requirements, the identity should be verified in line with its legal form.

Where the applicant is domiciled in a high risk jurisdiction, the following is also required:

- Due Diligence Questionnaire (incl. SOW/SOF for investor and UBO)
- Identify and verify the identity of any beneficial owner beneficially entitled to 10% or more (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the entity;

  or

- Written confirmation from the entity carrying out AML/CTF controls similar to that requested from a regulated third party undertaking due diligence.
- Where there is no beneficial owner entitled to 10% or more, the natural person(s) who hold the position of senior managing official(s)/director(s) of the entity must be identified and verified.

A.12 Individuals (including Joint Account Holders)

Where the applicant is an Individual, please provide the following documentation:

- Photographic identity document.
- Proof of address.
- Source of wealth and source of funds. In general e-mail confirmation or completion of the relevant section of the app will suffice.

Where the applicant is domiciled in a high risk jurisdiction, the following is also required:

- Due Diligence Questionnaire (incl. Source of Funds and Source of Wealth). Documentary evidence may be required for high risk investors.

All investor supplied documents for high risk applicants (except the due diligence questionnaire) to be certified in-line with NTIFASIL standards.

In the case of joints account holders, please provide documents in respect of all holders.

A.13 Private and Unlisted Company

Where the applicant is a Private Company/ Company not listed on a regulated financial market, please provide the following:

- Full name of the company.
- Registered number of the company.
- Registered office address & principal business address of the company.
- Verification of identity of the company from:
- Extract from relevant company registry or
- Certificate of incorporation or
- Copy of Mem & Arts or
- Copy of latest audited financial statement
- List of directors including name, date of birth and address for all directors
- Verify the identity of at least two directors or, where applicable, one director and one authorised signatory (i.e. for each, one copy of a photographic identity document and one copy Proof of Address).
- Identify and verify any beneficial owner beneficially entitled to 25% or more (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the entity. Where there is no beneficial owner entitled to 25% or more, the natural person(s) who hold the position of senior managing official(s)/ director(s) of the entity (investor) must be identified.
- Evidence of UBO Registration on the Beneficial Ownership Register (EU investors only).
- Confirmation of source of wealth and source of funds. In general email confirmation or completion of the relevant section of the app form will suffice

Note: Where the beneficial owner is a corporate entity, Northern Trust requires details of ultimate beneficial owners (this can be demonstrated through an Organisation chart signed by an authorised signatory or shareholder register or other company documentation etc. reflecting the ownership and control structure).

Note: Where the beneficial owner is deemed high risk per NT risk rating requirements, the identity should be verified in line with its legal form.

Where the applicant is domiciled in a high risk jurisdiction, the following is also required:

- Identify and verify the identity of any beneficial owner beneficially entitled to 10% or more (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the entity. Where there is no beneficial owner entitled to 10% or more, the natural person(s) who hold the position of senior managing official(s)/ director(s) of the entity must be identified and verified.
- Due Diligence Questionnaire (incl. SOW/SOF for investor and UBO)

A.14 Limited Liability Company

Where the applicant is a Limited Liability Company (LLC), please provide the following:

- Full name of the LLC.
- Registered office address & principal business address of the LLC.
- Constitutional document (e.g. certificate of formation) or Operating agreement
- Identify all managing members (name, date of birth and address)
- Verify the identity of at least two managing members or, where applicable, one managing member and one authorised signatory.
- Identify and verify any beneficial owner beneficially entitled to 25% or more (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the entity. Where there is no beneficial owner entitled to 25% or more, the natural person(s) who hold the position of senior managing official(s)/director(s) of the entity must be identified.
- Evidence of UBO Registration on the Beneficial Ownership Register (EU investors only).
- Confirmation of source of wealth and source of funds. In general email confirmation or completion of the relevant section of the app form will suffice

Note: Where the beneficial owner is a corporate entity, Northern Trust requires details of ultimate beneficial owners (this can be demonstrated through an Organisation chart signed by an authorised signatory or shareholder register or other company documentation etc. reflecting the direct and/ or indirect ownership and control structure).

Note: Where the beneficial owner is deemed high risk per NT risk rating requirements, the identity should be verified in line with its legal form.

Where the applicant is domiciled in a high risk jurisdiction, the following is also required:

- Identify and verify the identity of any beneficial owner beneficially entitled to 10% or more (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the entity. Where there is no beneficial owner entitled to 10% or more, the natural person(s) who hold the position of senior managing official(s)/ managing members(s) of the entity must be identified and verified.
- Due Diligence Questionnaire (incl. SOW/SOF for investor and UBO)

A.15 Partnership

Where the applicant is a Partnership, please provide the following:

- Full name of the partnership.
- Registered office address & principal business address of the partnership.
- Identify all partners (name date of birth, address) (where practical)
- Or, if a Partnership Fund, names and address and date of birth of General Partner and partners who own more than 25% of the shares, profit or voting rights and listing of directors if appropriate.
- Constitutional document (e.g. Partnership Agreement)
- Verify the identity of all partners who own 25% or more (directly or indirectly) of the partnership capital, profit or voting rights or otherwise exercise control over the management of the Partnership Fund. Where there is no partner entitled to 25% or more, the natural person(s) who hold the position of senior managing official(s) of the entity must be identified.
- Confirmation of source of wealth & source of funds. In general email confirmation or completion of the relevant section of the app form will suffice.
- Verify the identity of the general partner and a second partner (or in the absence of same an authorised signatory).
- Evidence of UBO Registration on the Beneficial ownership Register (EU investors only).

Note: Where the beneficial owner is a corporate entity, Northern Trust requires details of ultimate beneficial owners (this can be demonstrated through an Organisation chart signed by an authorised signatory or shareholder register or other company documentation etc. reflecting the direct and/ or indirect ownership and control structure).

Where the applicant is not a Partnership Fund or located in one of the high risk jurisdictions, the following is also required:

- Due Diligence Questionnaire (incl. SOW/SOF for investor and UBO).
- Identify and verify the identity of any partner who own 10% or more (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the partnership. Where there is no partner entitled to 10% or more, the natural person(s) who hold the position of senior managing official(s)/partner(s) must be identified and verified.

A.16 Trust

Where the applicants are Regulated Trustees investing on behalf of a Trust or similar entity, please provide the following (only applicable for Trustees not located in a high risk jurisdiction):

- Full name of trust.
- Country of establishment of trust.
- Legal form of the trust.
- Trust deed or equivalent or confirmation of the trust etc. by reference to an appropriate register.
- Confirmation of the nature/purpose of the trust.
- Identify all Trustees and verify the identity of at least two trustees where applicable.
- Identify and verify the settlor.
- Identify and verify the protector.

- Identify all beneficiaries or the class of beneficiary beneficially entitled to trust's assets or the beneficial interest (Note: Verification of the beneficiaries will only be required where payment is made directly to the beneficiary).
- Verify the identity of the beneficiaries to the extent warranted by risk. Where there is no beneficial owner entitled to 25% or more, the natural person(s) who hold the position of senior managing official(s)/trustee(s) of the entity must be identified.
- Evidence of UBO Registration on the Beneficial Ownership Register (EU investors only).
- Confirmation of source of wealth and source of funds. In general email confirmation or completion of the relevant section of the app form will suffice

Note: Where the beneficial owner is a corporate entity, Northern Trust requires details of ultimate beneficial owners (this can be demonstrated through an Organisation chart signed by an authorised signatory or shareholder register or other company documentation etc. reflecting the direct and/ or indirect ownership and control structure).

Where the applicants are domiciled in a high risk jurisdiction, the following is also required:

- Confirmation as to how the settlor was in a position to make the investment.
- Due Diligence Questionnaire (incl. SOW/SOF for investor and settlor)
- Verify the identity of all trustees (i.e. in accordance with their legal structure)
- Identify all beneficiaries or identify the class of beneficiaries.
- Verify the identity of the beneficiaries beneficially entitled to trust's assets or beneficial interest, where practicable.

All investor supplied documents for high risk applicants (except the due diligence questionnaire) to be certified in-line with NTIFASIL standards.

A.17 Foundation

Where the foundation is a registered charity please refer to charity requirements.

Where the applicant is evidenced to be a local or community based foundation in another deemed low or medium risk country **please provide the following**:

- Full name of the foundation.
- Registered address of the foundation.
- Consider the legal form of the Foundation.
- Constitutional documents equivalent OR confirmation of the foundation by reference to an appropriate register.
- Identify and verify the founder, where practical,
- Nature/purpose of the foundation.
- Identify all trustees, and verify the identity of two trustees, where applicable. Where the trustee is regulated proof of regulation should be placed on file.
- Confirmation of source of wealth & source of funds. In general email confirmation or completion of the relevant section of the app form will suffice.
- Identify and verify any beneficiary beneficially entitled to 25% or more of the foundation's assets. Where there is no beneficial owner entitled to 25% or more, the natural person(s) who hold the position of senior managing official(s)/trustee(s) of the entity should be identified.

- Evidence of UBO Registration on the Beneficial Ownership Register (EU investors only).

Note: Where the beneficial owner is a corporate entity, Northern Trust requires details of ultimate beneficial owners (this can be demonstrated through an Organisation chart signed by an authorised signatory or shareholder register or other company documentation etc. **reflecting the direct and/ or indirect ownership and control structure).**

Where the applicants are domiciled in a high risk jurisdiction, the following is also required:

- Verify the identity of two trustees authorised to operation on behalf of the foundation or, where applicable, one officer and one authorised signatory.
- Where there are a large number of trustees, consideration will be given as to whether more than two trustees need to be verified (e.g. where additional risk factors have been identified)
- Confirmation of the funding of the foundation.
- 13. Due Diligence Questionnaire (incl. SOW/SOF for investor and UBO)
- 14. Identify and verify the identity of the beneficiaries who hold 10% or more of the beneficial interest. Where there is no beneficial owner entitled to 10% or more, the natural person(s) who hold the position of senior managing official(s)/trustee(s) of the entity should be identified and verified.

A.18 Charity

Where the applicant is a registered Charity, please provide the following:

- Full name of the charity.
- Nature/purpose of the charity
- Nature and source of funding of the charity
- Registered office address & principal business address of the charity.
- Constitutional / Formation document (e.g. bye-laws or other governing document)
- Name, address and date of birth of all trustees/directors/board members/governors (or equivalent) of the charity.
- Identify and verify the company secretary or equivalent or, where applicable, verify the identity of one of the trustees.
- (If a charitable trust), details of the settlor of the charitable trust.
- Identify and verify any beneficiary beneficially entitled to 25% or more of the assets. Where there is no beneficial owner entitled to 25% or more, the natural person(s) who hold the position of senior managing official(s)/trustee(s) of the entity must be identified and verified.
- Evidence of UBO Registration on the Beneficial Ownership Register (EU investors only).
- Confirmation of source of wealth & source of funds. In general email confirmation or completion of the relevant section of the app form will suffice.
- Complete a check of the relevant charities register or source confirmation of the registration of the charity with the relevant tax authorities (e.g. UK Charities Commission/ HMRC/Guidestar).

Where the applicant is not a registered Charity or where the applicant is domiciled in a high risk jurisdiction, the following is also required:

- Verify the identity of two trustees authorised to operation on behalf of the charity or, where applicable, one officer and one authorised signatory.

  Where there are a large number of trustees, consideration will be given as to whether more than two

trustees need to be verified (e.g. where additional risk factors have been identified).

- Certified copies of the audited financial statements.
- Certified constitutional/ formation document of the charity.
- Due Diligence Questionnaire (incl. SOW/SOF for investor and UBO (if applicable), and jurisdictions funds are received from and paid to where not already evident).
- Identify and verify the identity of the beneficiaries (where ascertainable) of the charity. Where there is no beneficial owner entitled to 10% or more, the natural person(s) who hold the position of senior managing official(s)/trustee(s) of the entity must be identified and verified.
- Identify and verify the settlor, where applicable

A.19 Club or Society

Where the applicant is a Club or Society, please provide the following:

- Full name of the club/society.
- Registered office address of the club/society.
- Confirmation of the legal status of the Club/Society.
- Nature/Purpose including the nature of funding of the club/society.
- Constitutional/Formation Document (e.g. Trust Deed) and/or copy of audited financial statements (if available) or complete a check of a relevant register (i.e. FCA or the Mutuals Public Register in the UK).
- List of officers of the club/society including name, date of birth and address
- Verify the identity of two officers of the Club/Society authorised to operation on behalf of the club/society or, where applicable, one officer and one authorised signatory.
- Confirmation of source of wealth & source of funds. In general email confirmation or completion of the relevant section of the app form will suffice.
- Identify and verify any beneficiary beneficially entitled to 25% or more of the assets. Where there is no beneficial owner entitled to 25% or more, the natural person(s) who hold the position of senior managing official(s) of the entity must be identified and verified.
- Evidence of UBO Registration on the Beneficial Ownership Register (EU investors only).

Where the applicant is domiciled in a high risk jurisdiction, the following is also required:

- Verify the identity of two officers of the Club/Society authorised to operation on behalf of the club/society or, where applicable, one officer and one authorised signatory.
- Where there are a large number of officers, consideration will be given as to whether more than two officers need to be verified (e.g. where additional risk factors have been identified)
- Certified copies of audited financial statements.
- Certified constitutional/ formation document of the club/society
- Due Diligence Questionnaire (incl. SOW/SOF for investor and UBO)
- Identify and verify the identity of all persons who own or control 10% or more of the entity's share capital, profit or voting rights. Where there is no beneficial owner entitled to 10% or more, the natural person(s) who hold the position of senior managing official(s) of the entity must be identified and verified.

A.20 School, College or University

Where the applicant is a School, College or University, please provide the following:

1. Full name of the School, College or University.
2. Registered address of the School, College or University.
3. Verify the identity of the school etc. by checking with relevant registers and/or obtaining appropriate background information e.g. via internet search.
4. Identify main officials of the school including name, date of birth and address.
5. Identify and verify the identity of at least two officials or, where applicable, one official and one authorised signatory.
6. Obtain details of ownership of the entity. In particular, determine if in public ownership or independent. Where independently owned, identify and verify all persons who own or control 25% or more of the entity's share capital, profit or voting rights. Where there is no beneficial owner entitled to 25% or more, the natural person(s) who hold the position of senior managing official(s) of the entity must be identified and verified.
7. Evidence of UBO Registration on the Beneficial Ownership Register (EU investors only).
8. Identify and verify the settlor, where applicable.
9. Confirmation of source of wealth & source of funds. In general email confirmation or completion of the relevant section of the app form will suffice.

Where the applicant is domiciled in a high risk jurisdiction, the following is also required:

10. Identify and verify the identity of all persons who own or control 10% or more of the entity's share capital, profit or voting rights. Where there is no beneficial owner entitled to 10% or more, the natural person(s) who hold the position of senior managing official(s) of the entity must be identified and verified.
11. Identify and verify the identity of at least two officials or, where applicable, one official and one authorised signatory.

Where there are a large number of officials, consideration will be given as to whether more than two officials need to be verified (e.g. where additional risk factors have been identified).

12. Due Diligence Questionnaire (incl. SOW/SOF for investor and UBO/Settlor)

A.21 Church

Where the applicant is a Church, please provide the following:

1. Full name of the Church.
2. Registered office address & principal business address of the church.
3. Nature/purpose of the church including the nature of the funding of the church.
4. Complete a check of a relevant church register or source a copy of the revenue approval for the church;
5. Name, address and date of birth of all trustees/directors/governors/board member of the church.
6. Identify and verify the identity of the church secretary or equivalent or, where applicable, verify the identity of one of the trustees.
7. Identify and verify any beneficiary beneficially entitled to 25% or more of the assets. Where there is no beneficial owner entitled to 25% or more, the natural person(s) who hold the position of senior managing official(s)/trustee(s) of the entity must be identified and verified.
8. Identify and verify the settlor where applicable.
9. Confirmation of source of wealth & source of funds. In general email confirmation or completion of the relevant section of the app form will suffice.
10. Evidence of UBO Registration on the Beneficial Ownership Register (EU investors only).

Where the applicant is domiciled in a high risk jurisdiction, the following is also required:

11. Certified copies of audited financial statements for the church.
12. Identify and verify the identity of at least two officials or, where applicable, one official and one authorised signatory.

Where there are a large number of trustees consideration will be given as to whether more than two trustees needs to be verified (e.g. where additional risk factors have been identified).

13. Certified constitutional/formation document of the church.
14. Due Diligence Questionnaire (incl. SOW/SOF for investor and settlor if applicable).
15. Identify and verify the beneficiaries (where ascertainable) of the church. Where there is no beneficial owner entitled to 10% or more, the natural person(s) who hold the position of senior managing official(s)/trustee(s) of the entity must be identified and verified.

A.22 Trade Union

Where the applicant is a Trade Union, please provide the following:

1. Full name of the Trade Union.
2. Registered address of the trade union.
3. Establish whether the trade union is registered or otherwise listed by a controlling body for regulatory or oversight purposes (e.g. Congress of Trade Unions).
4. Names or classes of persons who stand to benefit from the Trade Union: or identify and verify any beneficiary beneficially entitled to 25% or more of the assets. Where there is no beneficial owner entitled to 25% or more, the natural person(s) who hold the position of senior managing official(s) of the entity must be identified.
5. Evidence of UBO Registration on the Beneficial Ownership Register (EU investors only).
6. Consider the legal form of the trade union, its stated purpose, aims and objectives using information from documents supplied for the trade union and through internet searches.
7. Deed or equivalent establishing the existence of the trade union (for example its constitution, bye-laws, rules).
8. Identify and verify all persons who are empowered to make the investment on behalf of the trade union (president, secretary, treasurer and other senior committee members).
9. Confirmation of source of wealth & source of funds. In general email confirmation or completion of the relevant section of the app form will suffice.

Where the applicant is domiciled in a high risk jurisdiction, the following is also required:

10. Identify and verify the identity of at least two senior committee members of the trade union. Where there are a large number of officials, consideration will be given as to whether more than two officials need to be verified (e.g. where additional risk factors have been identified).
11. Due Diligence Questionnaire (incl. SOW/SOF for investor)
12. Identify and verify the identity of all persons who own or control 10% or more of the entity's share capital, profit or voting rights. Where there is no beneficial owner entitled to 10% or more, the natural person(s) who hold the position of senior managing official(s) of the entity must be identified and verified.

APPENDIX B AML LETTERS

B.1 AML Letter of Assurance Requirements (provision in advance) - Unregulated Nominees and Regulated Credit or Financial Institution

B.1.1 Unregulated Nominee Letter of Assurance

[On Letterhead of the Regulated Parent Company]

[Date]

Northern Trust International Fund Administration
Services (Ireland) Limited
Georges Court
54-62 Townsend Street
Dublin 2
Ireland

Re: [Insert Name of Unregulated Nominee/ Intermediary Company] ('the Nominee Company')
Verification of Investor(s) Identity in accordance with applicable Anti Money Laundering and Counter Terrorist Financing ("**AML/CFT**") Laws and Regulations

Dear Sir/ Madam,

We confirm that, **[insert name of Regulated Parent Company]** (the **"Parent Company"**) with a registered office located at _____ [insert address] is licensed as _____ [insert description] by the _____ [insert regulatory body] and that we are supervised and monitored for compliance with AML/CFT regulatory requirements in _____ [insert country]. Our registration or licence number is _____ [insert registration or licence number].

We confirm that the **Nominee Company** is a wholly owned subsidiary of the **Regulated Parent Company**.

We are satisfied for Northern Trust International Fund Administration Services (Ireland) Limited (as administrator to funds) to rely on this confirmation for all designations where the above referenced Nominee Company has holdings.

The Regulated Parent Company make the following representations, warranties and undertakings in respect to both the Nominee Company and the Parent Company:

i. we have established AML/CFT policies, procedures and internal controls to ensure ongoing compliance with applicable AML/CFT and economic sanctions laws and regulations_____ (insert relevant law/regulation here);

ii. our AML/CTF policies, procedures and internal controls incorporate systems and controls to identify and verify our customers and beneficial owners , to identify source of funds, and performs (i) appropriate risk-grading procedures to differentiate between customer due diligence for high and low risk relationships (ii) ongoing customer due diligence, (iii) regular AML/CTF monitoring and sanction screening, (iv) staff AML/ CTF training and (v) detect, investigate and, as required, report any suspicious activities to the relevant authorities;

iii. we have systems and controls in place to identify Politically Exposed Persons, their relatives and close associates (collectively PEPs) and we conduct enhanced due diligence, including establishing the source of wealth and the source of funds, and enhanced ongoing monitoring on PEPs and other high risk customers.

With regard to customers who have invested via the Nominee Company in the Funds, we confirm;

i. the accounts will only be operated by the Nominee and / or the Parent Company who maintains ultimate, effective control over the account:

ii. we have performed customer due diligence and identified and verified the beneficial owner(s) (to the extent warranted by risk of money laundering and the financing of terrorism), and have obtained the information on the purpose and the intended nature of the business relationship;

iii. to the best of our knowledge, we are unaware of any activities on the part of the customer(s), their beneficial owners which could lead us to suspect an involvement in criminal conduct' money laundering or terrorist activities;

iv. we will retain documents and information on the customer(s), including any beneficial owner, obtained as part of customer identification and verification process for at least 5 years after the termination of their relationship with us;

v. we will provide the Fund and/or Northern Trust with related customer due diligence documents and information, which we may have on our files relating to the identity of the customer(s) and beneficial owner(s) upon request;

vi. none of the customer(s) including any beneficial owner are subject to sanctions lists administered by the European Union, the United States (including OFAC) and the United Nations, and we undertake to notify you immediately upon our identification of same should we become aware of such circumstances;

vii. we will notify the Fund and/or Northern Trust, on request, of its identification of PEPs.

We further undertake to advise you, should at any time in the future, there be any change in information provided above.

I confirm that I have sufficient knowledge of and responsibility for AML procedures and have the appropriate authority to provide the assurances given in this letter.

Yours faithfully,

[Capacity of signatory – Money Laundering Reporting Officer / Head of Compliance / Head of Risk / Director / Other]

For and on behalf of

[Regulated Entity]

Please complete the Declaration of Beneficial Ownership

Beneficial owner includes the natural person(s) who ultimately owns or controls a customer and/or the natural person(s) on whose behalf a transaction is being conducted. It also includes those persons who exercise ultimate effective control over a legal person or arrangement.

B.2 AML Letter Regulated Credit or Financial Institution Letter of Assurance (as Investor)

[On Letterhead of the Regulated Financial Intermediary]

[Date]

Northern Trust International Fund Administration
Services (Ireland) Limited
Georges Court
54-62 Townsend Street
Dublin 2
Ireland

Re:[Insert Name of Unregulated Nominee/ Intermediary Company] ('the Nominee Company')
Verification of Investor(s) Identity in accordance with applicable Anti Money Laundering and Counter Terrorist Financing ("**AML/CTF**") Laws and Regulations

Dear Sir/ Madam,

We confirm that, [insert name of Regulated Financial Intermediary] with a registered office located at [insert address] is licensed as _____ [insert description] by the _____ [insert regulatory body] and that we are supervised and monitored for compliance with AML/CTF regulatory requirements in _____ [insert country]. Our registration or licence number is _____ [insert registration or licence number].

We are satisfied for Northern Trust International Fund Administration Services (Ireland) Limited (as administrator to funds) to rely on this confirmation for all designations.

We hereby confirm the following in connection with all investors ("**Investors**") and their beneficial owners in all designations:

i. we have established AML/CTF policies, procedures and internal controls to ensure ongoing compliance with applicable AML/CTF and economic sanctions laws and regulations _____ (insert relevant law/regulation here);

ii. our AML/CTF policies, procedures and internal controls incorporate systems and controls to identify and verify our customers and beneficial owners , to identify source of funds, and performs (i) appropriate risk-grading procedures to differentiate between customer due diligence for high and low risk relationships (ii) ongoing customer due diligence, (iii) regular AML/CTF monitoring and sanction screening, (iv) staff AML/CTF training and (v) detect, investigate and, as required, report any suspicious activities to the relevant authorities;

iii. we have systems and controls in place to identify Politically Exposed Persons, their relatives and close associates (collectively PEPs) and we conduct enhanced due diligence, including establishing the source of wealth and the source of funds, and enhanced ongoing monitoring on PEPs and other high risk customers.

With regard to each investor who has invested via the financial intermediary in the Funds, we hereby confirm;

iv. the accounts will only be operated by the financial intermediary who maintains ultimate, effective control over the account;

v. we have performed customer due diligence and identified and verified the beneficial owner(s) (to the extent warranted by risk of money laundering and the financing of terrorism), and have obtained the information on the purpose and the intended nature of the business relationship;

vi. to the best of our knowledge, we are unaware of any activities on the part of the customer(s), their beneficial owners which could lead us to suspect an involvement in criminal conduct' money laundering or terrorist activities;

vii. we will retain documents and information on the customer(s), including any beneficial owner, obtained as part of customer identification and verification process for at least 5 years after the termination of their relationship with us;

viii. we will provide the Fund and/or Northern Trust with related customer due diligence documents and information, which we may have on our files relating to the identity of the customer(s) and beneficial owner(s) upon request;

ix. none of the customer(s) including any beneficial owner are subject to sanctions lists administered by the European Union, the United States (including OFAC) and the United Nations, and we undertake to notify you immediately upon our identification of same should we become aware of such circumstances;

x. we will notify the Fund and/or Northern Trust, on request, of its identification of PEPs.

We further undertake to advise you, should at any time in the future there be any change in any information provided above.

I confirm that I have sufficient knowledge of and responsibility for AML procedures and have the appropriate authority to provide the assurances given in this letter.

Yours faithfully,

[Capacity of signatory – Money Laundering Reporting Officer / Head of Compliance / Head of Risk / Director / Other]

For and on behalf of

[Regulated Entity]

Please complete the Declaration of Beneficial Ownership

Beneficial owner includes the natural person(s) who ultimately owns or controls a customer and/or the natural person(s) on whose behalf a transaction is being conducted. It also includes those persons who exercise ultimate effective control over a legal person or arrangement.

APPENDIX C DATA PRIVACY STATEMENT

Stonehage Fleming Pooled Investments (Ireland) Plc Data Privacy Statement

In accordance with the General Data Protection Regulation (697/2016/EU) (the "**GDPR**") and applicable Irish data protection legislation (currently the Irish Data Protection Acts 1988 to 2018) as same may be amended from time to time (collectively, "**Data Protection Legislation**") Stonehage Fleming Pooled Investments (Ireland) Plc (the "**Company**") being a data controller, must provide you with information on how the personal data that you provide as part of your subscription to shares in the Company will be processed by the Company, its service providers and delegates and their duly authorised agents and any of their respective related, associated or affiliated companies.

Where your details are provided to the Company as a consequence of your investment in the Company, then the Company, acting as a data controller may itself (or through a third party including but not limited to Northern Trust International Fund Administration Services (Ireland) Limited (the "**Administrator**") acting in its capacity as the Company's Administrator, Stonehage Fleming Investment Management Limited (the "**Investment Manager & Promoter**" and the "**Distributor**"), Carne Global Fund Managers (Ireland) Limited (the "**Manager**"), Tudor Trust Limited; the company secretary, the money laundering reporting officer, local paying agents and representatives and mailing firms appointed by any of the foregoing (together the "**Service Providers**") process your personal information or, to the extent that you are non-natural person, that of your directors, officers, employees, intermediaries and/or beneficial owners. Save where otherwise expressly provided, any reference in this data privacy statement to "**you**" or "**your**" in the context of processing personal data of data subjects shall be understood to mean and related to the personal data of your directors, officers, employees, intermediaries and/or beneficial owners as the context may require.

When processing your personal information, there may also be times where the Administrator will act as a data controller.

In this regard, please note the following:

Purposes of Processing and Legal basis for processing

The personal data collected from you or provided by you or on your behalf in connection with your holdings in the Company will be collected, stored, disclosed, used and otherwise processed by the Company or the Service Providers on behalf of the Company for the purposes outlined in the table below:

Processing Activity by or on behalf of the Company or the Administrator (or any of their affiliates, agents, employees, delegates or sub-contractors)	Legal Basis for Processing
To facilitate the opening of your account with the Company, the management and administration of your holdings in the Company and any related account on an on-going basis (the "**Services**") which are necessary for the performance of your contract with the Company, including without limitation the processing of redemption, conversion, transfer and additional subscription requests and the payment of distributions	Performance of the contract between the Company and you
In order to carry out anti-money laundering checks and related actions which the Company considers appropriate to report tax related information to tax authorities in order to comply with a legal obligation; and to meet any legal obligations imposed on the Company relating to, or the processing in the public interest or to pursue the Company's legitimate interests in relation to, the prevention of fraud, money laundering, terrorist	To meet any legal obligations imposed on the Company

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 on-going basis, in accordance with the Company and the Administrator's anti-money laundering procedures	
To report tax related information to tax authorities	In order to comply with a legal obligation
To monitor and record calls and electronic communications for (i) processing and verification of instructions, (ii) investigation and fraud prevention purposes, (iii) for crime detection, prevention, investigation and prosecution, (iv) to enforce or defend the Company and its affiliates', itself or through third parties to whom it delegates such responsibilities or rights	To comply with any legal obligation imposed on the Company, (v) to pursue the Company's legitimate interests in relation to such matters or (vi) where the processing is in the public interest.
To disclose information to other third parties such as service providers of the Company, auditors, regulatory authorities and technology providers in order to comply with any legal obligation imposed on the Company or in order to pursue the legitimate interests of the Company;	Compliance with a legal obligation to which the Company is subject
To monitor and record calls for quality, business analysis, training and related purposes	In order to pursue the legitimate interests of the Company to improve its service delivery
To update and maintain records and fee calculations	Performance of the contract between the Company and you
To retain AML and other records of individuals to assist with the subsequent screening of them by the Administrator including in relation to other funds or clients of the Administrator	In pursuance of the Administrator's and its clients' legitimate interests
Other purposes which are necessary to comply with the Company's or the Administrator's legal obligations and/or which are necessary for the Company or the Administrator's legitimate interests indicated above and/or the processing is in the public interest	To comply with the Company's or the Administrator's legal obligations and/or which are necessary for the Company or the Administrator's legitimate interests indicated above and/or the processing is in the public interest

Carrying out statistical analysis and market research for the following purposes;	Pursuing the legitimate interests of the Company including:
Recording, maintaining, storing and using recordings of telephone calls and electronic communications that you make to and receive from the Company, the Service Providers and their delegates or duly appointed agents and any of their respective related, associated or affiliated companies for any matters related to investment in the Company, dispute resolution, record keeping, security and/or training purposes; The Investment Manager as a data controller of your personal data may also collect, store, disclose, use or otherwise process your personal data for the purposes outlined in the table below;	a. for risk management and fraud prevention purposes, for the evaluation of your financial needs, monitoring your financial situation including for assessing creditworthiness and solvency, to manage litigation and for the Company's accounting purposes, for effecting processing on behalf of the Fund, for the exercise or defence of legal claims or for the protection of rights of another natural or legal person b. for the purposes of the provision of investor-related services including account administration, handling of orders, management of subscription, redemption and transfer of shares, maintaining the register of investors and distributions, managing distributions including the including the allocations of profit and loss between investors, internal audit validations, communications and more generally performance of services requested by and operations in accordance with the instructions of the investor. Further information relating to the balancing test undertaken by the Company in respect of such processing is available upon request.

The Investment Manager as a data controller of your personal data may also collect, store, disclose, use or otherwise process your personal data for the purposes outlined in the table below;

Processing Activity by the Investment Manager	Legal Basis for Processing
Retaining your name, address, date of birth, private and/or corporate email address, private and/or corporate telephone number, specific and general financial information, sensitive documentation and other data which relates to your background, circumstances, investment experience, and information pertaining to your employment including obtaining information from public registers with governmental and/or quasi-governmental Organisation's (e.g. the Financial Conduct Authority), copies of identification documents such as a passport or driving licence, photographs, links to your professional profiles available in the public domain e.g. LinkedIn, Twitter, and/or a corporate website which such information is received in connection with your investment in the Company	Pursuing the legitimate business interests of the Investment Manager including: ▶ To enable the Investment Manager to carry out its discretionary investment management and distribution activities; ▶ To enable the Investment Manager to comply with its regulatory and legal record-keeping obligations; ▶ To provide you with periodic updates as to the performance of the Company; ▶ To carry out the obligations arising from any contractual obligations amongst the Investment Manager, you and the Company; ▶ To provide you with the information, products and services that you request from the Investment Manager or that the Investment Manager thinks will be of interest to you because it is relevant to you, your Organisation and/or the shares that you hold in the Company;

- To provide you with information about other products and services that the Investment Manager offers that are similar to those that you have already been provided with or have enquired about.

Further information relating to the balancing test undertaken by the Investment Manager in respect of such processing is available upon request.

Please note that where personal data is processed for the purposes of legitimate interests, you have a right to object to such processing and the Company and its appointed Service Providers will no longer process the personal data unless it can be demonstrated that there are compelling legitimate grounds for the processing which override your interests, rights and freedoms or for the establishment, exercise or defence of legal claims.

Profiling and Screening

The Company and its appointed Service Providers may engage in PEP screening and financial sanctions screening programs defined by the European Union ("**EU**"), the United Nations ("**UN**"), Her Majesty's Treasury ("**HMT**") and the Office of Foreign Assets Control ("**OFAC**") for the purposes of complying with the Criminal Justice (Money Laundering and Terrorist Financing) Act 2010 as may be amended or replaced from time to time and with UN, EU and other applicable sanctions regimes. The implementation of such PEP screening and financial sanctions screening programmes may result in the Company or its Service Providers refusing an application for Shares in the Company or delaying or refusing to make any redemption payment or distribution payment to you if you, your directors or any beneficial owner of your Shares appear on such screening programmes. In the event that you are identified as a PEP as a result of the screening process, you may be required to provide additional information and/or documentation to the Company or its Service Providers. Such processing, which may reveal your political opinion, is considered lawful on the grounds of substantial public interest permitted under Article 9(2)(g) of the GDPR.

Undertaking in connection with other parties

By agreeing to provide personal data to the Company, you undertake to be authorised to disclose to the Company relevant information applicable to the beneficial owner of the investment, to your directors and authorised signatories and to persons that own, directly or indirectly, an interest in the Company. In this respect you confirm that you have provided these persons with all the information required under applicable data protection law, notably regarding their data protection rights, and received from these persons their authorisation for the processing and transfer of their personal data to

Recipients of Data and International Transfer of Data

The Company may disclose your personal information as follows:

- to its service providers, including the Administrator, and their affiliates, and other third-party service providers engaged by the Company in order to process the data for the above mentioned purposes;
- to competent authorities (including tax authorities), courts and bodies as required by law or requested or to affiliates for internal investigations and reporting; and
- other third parties where required by law or for legitimate business interests. This may include disclosure to third parties such as auditors, competent authorities (including tax authorities) such as the Central Bank of Ireland, as well as disclosure to regulatory bodies, taxation authorities, courts and bodies as required by law or requested or to, affiliates for internal investigations and reporting; and technology providers

The disclosure of personal information to the third parties set out above may involve the transfer of data to the USA and other jurisdictions outside the European Economic Area (EEA) in accordance with the

requirements of the General Data Protection Regulation. Such countries may not have the same data

Retention period

The Company and the Administrator will retain your personal information for as long as required for the Company or the Administrator to perform the Services or perform investigations in relation to same depending on whether additional legal/regulatory obligations mandate that the Company retains your personal information.

Data Subject Rights

You have the following rights, in certain circumstances, in relation to your personal information:

- Right to access your personal information.
- Right to rectify your personal information.
- Right to restrict the use of your personal information (in certain specific circumstances).
- Right to request that your personal information is erased (in certain specific circumstances).
- Right to object to processing of your personal information (in certain specific circumstances).
- Right to data portability (in certain specific circumstances).

Where the Company or the Administrator requires your personal information to comply with AML or other legal requirements, failure to provide this information means the Company may not be able to accept you as an investor in the Company.

You have the right to lodge a complaint with a supervisory authority in the EU Member State of your habitual residence or place of work or in the place of the alleged infringement if you consider that the processing of personal data relating to you carried out by the Company or its service providers infringes the General Data Protection Regulation.

How to contact us

If you have any questions about the Company's use of your personal information, please contact the Manager at the following email address: carneoversightteam@carnegroup.com and if you have any questions about the Investment Manager's use of your personal information, please contact the Investment Manager at the following email address: ukdataprotectionofficer@stonehagefleming.com and/or Stonehage_TA@ntrs.com.

GLOBAL BEST IDEAS

EQUITY FUND

Quality. Growth.

www.globalbestideas.com