

Common Reporting Standard (CRS) Self-Certification Form for Entities and Controlling Persons



Entity Tax Residency Self- Certification Form

The standing institutional framework (Laws 4428/2016 and 4378/2016, concerning the Automatic Exchange of Financial Account Information for Tax purposes) and the US Foreign Account Tax Compliance Act (FATCA), requires from Greek Financial Institutions to determine their Accounts Holders' tax residency. Consequently, the completion and submission of this Form on your behalf will allow Alpha Bank to hold accurate and up to date information about your tax residency.

The collection, processing and forwarding of information contained in this Form concerns the fulfillment of the obligations of Alpha Bank as they derive from the above legal framework and the applicable provisions of the legislation on the Protection of Personal Data.

It is noted that if the Account Holder's tax residency is outside Greece, Alpha Bank may be obliged to report the information contained in this Form along with other financial information regarding the Account Holder's financial accounts to the Greek Tax Authority. This information may then be exchanged with Tax Authorities of other countries that have concluded bilateral intergovernmental agreements with Greece for the exchange of financial accounts information.

This Form is for entity Account Holders only (which includes Businesses, Trusts and Partnerships). For joint or multiple Account Holders please complete a separate Form for each Account Holder.

Do not complete this Form if you are an Individual Account Holder, or sole trader or sole proprietor. Instead, please complete an "Individual tax residency self-certification".

Where the Account Holder is a Passive NFE, or an Investment Entity located in a Non-Participating Jurisdiction managed by another Financial Institution, please provide information on the natural person(s) who exercise control over the Account Holder (individuals referred to as "Controlling Person(s)") by completing the Part 5 "Account Holder's Controlling Persons" for each Controlling Person. This information should be provided by all Investment Entities located in a Non-Participating Jurisdiction and managed by another Financial Institution.

In case you complete this Form on behalf of a Controlling Person, you must arrange for him to be informed.

If the Account Holder is a U.S. tax resident (for tax purposes, a registered office in the United States or "US Territory"), this must be indicated in this Form (Part 1 Identification of Account Holder and Part 2 Tax Residency) and require the W-9 Certification Form of the US Tax Authority- IRS is required to be additionally submitted. For instructions on completing it, please visit the IRS website https://www.irs.gov/Forms-&-Pubs.

Please note that additional information and/ or documentation may be required upon request.

The Self – Certification Form will remain valid unless there is a change in circumstances relating to information, such as the Account Holder's tax status or other mandatory field information that makes the Form incorrect or incomplete. In that case, you must notify and provide us with an updated self-certification.

If the Account Holder refuses to provide the Form completed and legally signed, Alpha Bank is obliged to proceed with the classification and reporting of the Accounts held as Undocumented. Consequently, financial information for tax purposes will be sent to the competent national tax authority.

If you have any remaining questions about how to complete this Form or about how to determine your tax residency status, please contact your tax adviser or local tax authority.

Alpha Bank will not provide assistance beyond the information contained within this guide as by law we are not permitted to give tax advice.

<u>Please complete the Form in Capital Letters, after reading the Instructions and the Summary Description of Selected Terms in the Appendix. All fields are mandatory.</u>

A. Legal Name of the Entity/ Branch or Organization	
B. Headquarters' Country :	C. Country of parent company:
D. Headquarters' Address:	
Street, Number:	
Town, City:	
Postal/ ZIP Code:	
State/ Country:	
E. Mail Address: (it should be filled in, if it is different from	the current above-mentioned D)
Street, Number:	Area, City:
Country:	Postal/ ZIP Code:
CDI Number at Alpha Bank*:	
To be completed by the Bank	

Part 2 **Tax Residency**

Please indicate the Country of Residence for Tax Purposes and related Taxpayer Identification Number ("TIN") or functional equivalent

Please complete the following table by specifying (i) the country (ies) in which the Account Holder- Entity/ Organization- is tax resident and (ii) the Account Holder's TIN or functional equivalent for each country (ies) / Reportable Jurisdiction (s) indicated.

If the Account Holder is not Resident for tax purposes in any country / jurisdiction, please state on line 1 "NONE" and indicate its place of effective management or country/ jurisdiction in which its principal office is located. If the Account Holder is tax resident in more than three countries/ jurisdictions, please use a separate sheet.

If **no TIN** is available, please provide the relevant reason A, B or C where appropriate: Reason A - The country/ jurisdiction where the Account Holder is resident does not issue TINs to its residents

Reason B – The Account Holder is otherwise unable to obtain a TIN or equivalent number.

(Please explain why you are unable to obtain a TIN in the below table, provided that you have selected the specific reason). Reason C. No TIN is required. (Note: Please select the specific reason if the domestic law of the country of tax residence filled in below does not require the collection / disclosure of the TIN issued).

No.	Country of Residence for Tax Purposes	Local Tax Identification Number (TIN)	If no TIN available, enter reason A,B or C
1			
2			
3			

Pleas	se explain in the following table why you are unable to obtain a TIN, provided that you selected Reason I	B above.
1		
2		
3		
	ify that for tax purposes the Account Holder does not have tax residence in any country other than the tries indicated in Part 2 above.	



Part 3	Entity Type
Part 3	Entity type

If the Entity/ Organization is not a Financial Institution, please proceed directly to Part 3B

Part 3A Complete this part only if the Account Holder is a Financial Institution

If the Entity/Organization is a **Financial Institution**, please indicate the Account Holder's CRS Status by ticking one of the following options.

	FINANCIAL INSTITUTIONS	CRS status
(i)	Depository Institution, Custodial Institution, Specified Insurance Company	
(ii)	Investment Entity managed by another Financial Institution, and located in a Non-Participating Jurisdiction (Note: if ticking this box please complete additionally the table of "Controlling Persons" in Part 5 for each Controlling Person)	
(iii)	Other Investment Entity Please specify	

•	-	f the above, please provide, if held, the Account Holder's Global Intermediary Identification for FATCA purposes.	on

Part 3B Complete this part only if the Account Holder is a Non-Financial Institution

If the Entity <u>is not</u> <u>a Financial Institution</u>, please indicate the Account Holder's CRS Status by ticking one of the following Boxes:

		NON-FINANCIAL ENTITIES (NFEs)	
			CRS status
(i)	Active NFE	Active Business that does not fall under the below mentioned (ii), (iii), (iv) and (v) categories (i.e. start- up or non-profit NFE)	
(ii)	Active NFE	Publicly Traded Corporation: a corporation the stock of which is regularly traded on an established securities market or a corporation which is a related entity of such a corporation.	
		Please provide the name of the established securities market on which the corporation is regularly traded:	
		If you are a related entity of a regularly traded corporation, provide the name of the regularly traded corporation that the entity in (ii) is a related entity of:	
(iii)	Active NFE	Government Entity or Central Bank	
(iv)	Active NFE	International Organization	
(v)	Active NFE	Other: Start-up NFE, NFE that is liquidating or emerging from bankruptcy, Treasury Centers members of a non-financial group, Non- profit or Charity NFEs, Holding NFE member of a non-financial group etc.	
		Please provide the Entity's exact Status	

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	(vi)	Passive NFE	A NFE that is not an Active NFE. (If ticking this box please complete additionally the table of <u>"Controlling Persons"</u> in Part 5 for each " <u>Controlling Person"</u>	
			Note: If there are no natural person(s) who exercise control of the Account Holder then the Controlling Person will be the natural person(s) who hold the position of senior managing official. Regarding the definition of "Controlling Person", please refer to Section 2 Appendix – Summary of Selected Terms.	

Part 4 Declaration and Signature

I fully understand that the information provided through this Form to Alpha Bank is covered by the total provisions of the terms and conditions governing the Account Holder's (mentioned in "Part 1) relationship with Alpha Bank. In particular the specific conditions determine how Alpha Bank may use, process and notify the information contained in this Form.

I acknowledge and agree that the information contained in this Certification form and information regarding the Account Holder (mentioned in Part 1) any Controlling Person and any Reportable Account(s) may be reported to the Greek tax authorities and exchanged with tax authorities of another country or countries in which the Account Holder may be resident for tax purposes pursuant to intergovernmental agreements to exchange financial account information

I have been informed of the <u>Summary of Selected Terms</u>, which is set out in the Appendix – <u>Section 2 of the Entity for Taxation</u> Self Certification for Entities and Controlled Persons.

The requested information is compulsory and failure to complete this Form could mean that Alpha Bank is authorized by Law to report the Reportable Account held by the Account Holder to the Greek Tax Authorities as an Undocumented Account.

The collection, processing and forwarding of information contained in this form concerns the fulfillment of the obligations of Alpha Bank as they derive from legal framework concerning the Automatic Exchange of Financial Account Information for Tax purposes and the applicable provisions of the legislation on the Protection of Personal Data.

I declare that all statements and information made in this Certification are, to the best of my knowledge and belief, true, correct and complete.

I undertake to inform Alpha Bank promptly of any change in circumstances which affects the tax residency status of the Account Holder of this Form or causes the information contained herein to become incorrect or incomplete (including any changes to the information referred on Controlling Person (s) in Part 5), and to provide Alpha Bank with a new suitably updated Certification and Declaration within 30 days of such change in circumstances

I have been informed of the <u>Summary of Selected Terms</u>, <u>which is set out in the Appendix – Section 2 of the Entity for Taxation Self Certification for Entities and Controlling Persons</u>.

Authorized Represenative 1	Authorized Representative 2
First and Last name in capital letters	First and Last Name in capital letters
Capacity with which you are signing the Self -	Capacity with which you signing the Self -
Certification Form	Certification Form
Signature of the authorized representative	Signature of the authorized representative
	·
Date / /	City
Date	City

I certify that I have the capacity to sign for the entity identified in Part 1 of this Form.

Note that:

- if the representative authorized to sign is jointly authorized, this Form has to be signed by at least two of the jointly authorized representatives
- If you are signing the present Form under a power of attorney, please also attach the certified copy of the power of attorney.

Part 5 **Account Holder's Controlling Persons**

Please read the instructions in the Appendix and the Summary of Selected Terms before completing this Form.

This section should be completed by all Controlling Persons where this is indicated in Part 3A and Part 3B in capital letters

"Controlling Persons" are the natural person(s) who exercise control over an entity. Where the Entity /Organization has been certified in Part 3A and Part 3B as being a Passive Non-Financial Entity ("Passive NFE"), or an Investment Entity managed by another Financial Institution and located in a Non-Participating Jurisdiction then the Bank is required to determine whether or not these Controlling Persons are Reportable Persons (e.g. citizens or residents in any country/territory other than Greece for tax purposes).

Please note that If there are no natural person(s) who exercise control of the Entity then the Controlling Person will be the natural person(s) who hold the position of senior managing official

In the case of a trust, the Controlling Person(s) are the settlor(s), the trustee(s), the protector(s) (if any), the beneficiary(ies) or class(es) of beneficiaries, or any other natural person(s) exercising ultimate effective control over the trust (including through a chain of control or ownership). In the case of a legal arrangement other than a trust, "Controlling Person(s) means persons in equivalent or similar positions.

If the Controlling Person(s) are" U.S. Persons", citizens or residents of the U.S. for tax purposes then this capacity should be indicated in this Form and they should additionally complete a W-9 form.

Please check this box to confirm that the Entity does not have any Controlling Person.

Part I			ldenti	fication of a	a Cor	ntrolling Pers	on	No 1					
	e of Acco	ount Holder	Surnan					st /Name/ Mid	dle 1	Name(s):			
B. Date	of Birth		DD/MN	M/YYYY:				Place of Birtl (City / Countr		Town: Country:			
D. Curro Address	ent Resid s	dence	ĺ	Number: City/Municipality	:		Po	stal / Zip Code	Э	Country:			
	ng Addre plete if d			, ,									
Part II		Country of	Posid	once of a Co	ontro	lling Person	for	Tay Burna	.co	and rolator	1 TI	Nor	
rait ii		functional			סווווט	illilig Ferson	101	rax Purpo	5E:	anu reialet	. I II	N OI	
		•											
Cou	intry of T	ax Residence	Та	x Identification	Num	ber -TIN	lf n exi	no TIN is avai planation*	lable	e, provide reas	on A	ABC and	
1													
2													
3													
PART	III T	ype of Contro	llina P	erson									
(Comple	te this se	ection only if you e Controlling Perso	are resid	lent for tax pur									
(CP) Control		P of a Legal		Control by ownership		Control by other means		Senior mana	aging	g official			
Person		P Person of		Settlor				Protector		Beneficiary		Other	
Type		Trust											
	A	CP of a Legal Arrangement (Non	- -	Settlor Equivalent		Trustee- Equivalent		Protector Equivalent		Beneficiary Equivalent		Other Equivalent	

Reason B - The Account Holder is otherwise unable to obtain a TIN or equivalent number

Reason C - No TIN is required

(Note: Only select this reason if the domestic law of the country of tax residence filled in below does not require the collection/ disclosure of

Please explain in the boxes above why you are unable to obtain a TIN if you selected Reason B above.



	Account Holder	Surname		- 001	ntrolling Pers	Firs	t /Name/ Mid	dle N	lame(s):			
		,	<i>z</i> (0).									
. Date of Bi	irth	DD/MM/	YYYY:			_	Place of Birtl City / Countr		Town: Country:			
. Current R ddress		,	lumber:			Pos	stal / Zip Code	Э	Country			
. Mailing A		own/Ci	ty/Municipality:									
Part II				ontro	olling Person	for	Tax Purpo	ses	and relate	d TI	N or	
	of Tax Residence	•	x Identification	n Num	ber -TIN		o TIN is avai lanation*	lable	e, provide reas	son /	ABC and	
												_
3												
PART III	Type of Control	re resid	dent for tax pui		oriate box Perc	entage		ding :	>25%			
lease provide			Control by		Control by			agirig	i Official 🗀			
lease provide	CP of a Legal Person		Control by ownership		Control by other means		000					
CP) Controlling Person	CP of a Legal Person CP Person of a Trust		ownership Settlor		other means Trustee		Protector		Beneficiary		Other	[
	CP of a Legal Person CP Person of		ownership		other means Trustee				Beneficiary Beneficiary Equivalent		Other Other Equivalent]



A Name of A				a Cor	ntrolling Pers						
A. Name of A	ccount Holder	Surnar	ne (s):			Firs	st /Name/ Mid	dle N	lame(s):		
B. Date of Bi	rth	DD/MN	I/YYYY:			_	Place of Birtl City / Countr		Town: Country:		
D. Current Ro	esidence	Street,	Number:			Pos	stal / Zip Code	Э	Country:	,	
		Town/0	City/Municipality	·:							
E. Mailing Ac (complete	ldress if different)										
Part II					e of a Contro nal equivale			or T	ax Purpose	s a	nd
	of Tax Residence	Та	x Identification	n Num	ber -TIN		o TIN is avai planation*	lable	, provide reas	son <i>i</i>	ABC and
1											
2											
3											
PART III	Type of Control	ing P	erson								
Complete this Please provide	s section only if you a the Controlling Person	re resid	lent for tax pu								
Complete thing Please provider (CP)	s section only if you a the Controlling Person	re resid	dent for tax pures by ticking the		oriate box Perc		e of Sharehold	ding :	>25%		
Complete thing Please provider (CP) Controlling Person	s section only if you a the Controlling Person CP of a Legal Person CP Person of a Trust	re resions status	lent for tax pures by ticking the	approp	oriate box Perc	entage	e of Sharehold	ding :	>25%		Other
	s section only if you a the Controlling Person CP of a Legal Person CP Person of	re resid	dent for tax pures by ticking the Control by ownership	approp	Control by other means	entage	Senior mana Protector Protector	ding :	>25% official		



Part 6

Declaration and Signature

I fully understand that the information provided through this Form to Alpha Bank is covered by the total provisions of the terms and conditions governing the Account Holder's (mentioned in "Part 1) relationship with Alpha Bank. In particular the specific conditions determine how Alpha Bank may use, process and notify the information contained in this Form.

I acknowledge and I agree that the information contained in this Self - Certification Form as well as information regarding the Account Holder (mentioned in Part 1), any Controlling Person and any Reportable Account(s), may be reported to the competent Greek tax authority and exchanged with tax authorities of another country or countries, in which the Account Holder may be resident for tax purposes, pursuant to intergovernmental agreements to exchange financial account information.

I have been informed of the <u>Summary of Selected Terms</u>, which is set out in the Appendix – Section 2 of the Self Certification Form for Entities and Controlling Persons.

The requested information is compulsory and failure to complete this Form could mean that Alpha Bank is authorized by Law to report the Reportable Account held by the Account Holder to the competent Greek Tax Authorities as an Undocumented Account.

I acknowledge that the collection, processing and forwarding of information contained in this Form concerns the fulfillment of the obligations of Alpha Bank as they derive from legal framework regarding the Automatic Exchange of Financial Account Information for Tax purposes and the applicable provisions of the legislation on the Protection of Personal Data.

I certify that I am the Controlling Person (or I am authorized to sign on behalf of the Controlling Person) in respect of all the accounts which are held by the Account Holder identified in Part 1 of this Form. I also certify that I have informed every person whose information are provided to this Form in respect with the collection, processing and notification of their personal information. I declare that all statements and information made in this Certification are, to the best of my knowledge and belief, true, correct and complete.

I undertake to inform Alpha Bank promptly of any change in circumstances which affects the tax residency status of the Account Holder identified in Part 1 of this Form or causes the information contained herein to become incorrect or incomplete (including any changes to the information referred on Controlling Person (s) in Appendix 1, and to provide Alpha Bank with a new appropriately updated Certification and Declaration within 30 days of such change in circumstances.

Note: If you are signing under a power of attorney, please also attach a certified copy of the power of attorney



Part 6

Declaration and Signature

I fully understand that the information provided through this Form to Alpha Bank is covered by the total provisions of the terms and conditions governing the Account Holder's (mentioned in "Part 1) relationship with Alpha Bank. In particular the specific conditions determine how Alpha Bank may use, process and notify the information contained in this Form.

I acknowledge and I agree that the information contained in this Self - Certification Form as well as information regarding the Account Holder (mentioned in Part 1), any Controlling Person and any Reportable Account(s), may be reported to the competent Greek tax authority and exchanged with tax authorities of another country or countries, in which the Account Holder may be resident for tax purposes, pursuant to intergovernmental agreements to exchange financial account information.

I have been informed of the <u>Summary of Selected Terms</u>, which is set out in the Appendix – <u>Section 2 of the Self Certification</u> Form for Entities and Controlling Persons.

The requested information is compulsory and failure to complete this Form could mean that Alpha Bank is authorized by Law to report the Reportable Account held by the Account Holder to the competent Greek Tax Authorities as an Undocumented Account.

I acknowledge that the collection, processing and forwarding of information contained in this Form concerns the fulfillment of the obligations of Alpha Bank as they derive from legal framework regarding the Automatic Exchange of Financial Account Information for Tax purposes and the applicable provisions of the legislation on the Protection of Personal Data.

I certify that I am the Controlling Person (or I am authorized to sign on behalf of the Controlling Person) in respect of all the accounts which are held by the Account Holder identified in Part 1 of this Form. I also certify that I have informed every person whose information are provided to this Form in respect with the collection, processing and notification of their personal information. I declare that all statements and information made in this Certification are, to the best of my knowledge and belief, true, correct and complete.

I undertake to inform Alpha Bank promptly of any change in circumstances which affects the tax residency status of the Account Holder identified in Part 1 of this Form or causes the information contained herein to become incorrect or incomplete (including any changes to the information referred on Controlling Person (s) in Appendix 1, and to provide Alpha Bank with a new appropriately updated Certification and Declaration within 30 days of such change in circumstances.

Legal or Authorized representative or Controlling Person
First Name and Surname in Capital Letters
Capacity in which you are signing the certification Form
Signature of the Legal or Authorized representative or Controlling Person
Date / / City
Datei

Note: If you are signing under a power of attorney, please also attach a certified copy of the power of attorney



APPENDIX

Section 1 Instructions

Note: The following definitions of selected terms are intended to help you complete this Form.

More details can be found on the OECD web portal and more specifically on the following link, which contains material related to the OECD Common Reporting Standard:

http://www.oecd.org/tax/transparency/automaticexchangeofinformation.htm

In addition, the relevant definitions (CRS) are included in Greek Laws 4378/2016, 4428/2016.

General information on Foreign Account Tax Compliance (FATCA) can be found at the following link:

http://www.treasury.gov/resource-center/tax-policy/treaties/Pages/FATCA.aspx.

Furthermore, the relevant definitions are included in the Greek Law 4493/2017.

If you still have questions, please contact your tax advisor or the competent national tax authority.

Every jurisdiction has its own regulations to determine where an Account Holder's tax residency is and many of them have provided relevant information in the following OECD's (Organization for Economic Co-operation and Development) website: http://www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/tax-residency/. In certain cases, Account Holders might find themselves in a position where based on the domestic rules of certain jurisdictions, they could be considered a tax resident in more than one jurisdiction. In that case, Account Holders may consult their tax advisor or the Greek Tax Authority or visit the OECD web portal.

Short definitions of specific terms are found in Section 2 ("Summary Description of Selected Terms") of the Appendix.

Following its completion and submission, the specific Form remains valid for as long as there has been no change in circumstances relating to information, such as:

- The Account Holder's tax status
- The Controlling Person's (s) Tax Residence (s)
- The Entity's main activity
- A Controlling Person
- Change of address
- Tax Identification Number Changes

If your circumstances change and any of the information provided in this Form becomes incorrect or incomplete, please notify Alpha Bank immediately and provide an updated Self-Certification Form.

The Form is intended to request information only where such request is not prohibited by local law

A branch of an Entity is treated as an Entity for the purposes of the CRS and the Form should be completed with details for the branch, and not for its parent

If you are completing this Form on the Account Holder's behalf:

You should indicate the capacity in which you have signed in Part 4, Part 5 and Part 6. For example, you may be the custodian or nominee of an account on behalf of the account holder. Or you may be completing the Form under a signatory authority or power of attorney.

As a financial institution, we are not allowed to give you any tax advice, including entity classification and tax residence.

It is the responsibility of the Account Holder to ensure that the information provided is complete and accurate and to provide Alpha Bank with any additional documentation, information or replace Forms when requested or required. Alpha Bank assumes no responsibility for the verification of any information provided on this Form and will rely on such Information as being complete and accurate in all material respects. Alpha Bank is also under no obligation to accept a Form if it has reason to know, believe or have actual knowledge that the information contained in the Form is invalid or incorrect.

It becomes clear that nothing in these instructions should be interpreted as legal or tax advice.

Section 2 Appendix Summary Description of Selected Terms

"Account Holder"

The "Account Holder" is the person listed or identified as the holder of a Financial Account by the Financial Institution that maintains the account. This is regardless of whether such person is a flow-through Entity. Thus, for example, if a trust or an estate is listed as the holder or owner of a Financial Account, the trust or estate is the Account Holder, rather than the trustee or the trust's owners or beneficiaries. Similarly, if a partnership is listed as the holder or owner of a Financial Account, the partnership is the Account Holder, rather than the partners in the partnership. A person, other than a Financial Institution, holding a Financial Account for the benefit or account of another person as agent, custodian, nominee, signatory, investment advisor, or intermediary, is not treated as holding the account, and such other person is treated as holding the account.

"NFE" (CRS)

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

"Active Non Financial Entity"

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

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

An entity will be classified as Active NFE if it meets any of the following criteria:

- less than 50% of the NFE's gross income for the preceding calendar year or other appropriate reporting period is passive income and less than 50% of the assets held by the NFE during the preceding calendar year or other appropriate reporting period are assets that produce or are held for the production of passive income;
- the stock of the NFE is regularly traded on an established securities market or the NFE is a Related Entity of an Entity the stock of which is regularly traded on an established securities market,
- the NFE is a Governmental Entity, an International Organization, a Central Bank, or an Entity wholly owned by one or more of the foregoing;
- substantially all of the activities of the NFE consist of holding (in whole or in part) the outstanding stock of, or providing financing and services to, one or more subsidiaries that engage in trades or businesses other than the business of a Financial Institution, except that an Entity does not qualify for this status if the Entity functions (or holds itself out) as an investment fund, such as a private equity fund, venture capital fund, leveraged buyout fund, or any investment vehicle whose purpose is to acquire or fund companies and then hold interests in those companies as capital assets for investment purposes;
- the NFE is not yet operating a business and has no prior operating history, (a " start-up NFE") but is investing capital into assets with the intent to operate a business other than that of a Financial Institution, provided that the NFE does not qualify for this exception after the date that is 24 months after the date of the initial organization of the NFE;
- the NFE was not a Financial Institution in the past five years, and is in the process of liquidating its assets or is reorganizing with the intent to continue or recommence operations in a business other than that of a Financial Institution:
- the NFE primarily engages in financing and hedging transactions with, or for, Related Entities that are not Financial Institutions, and does not provide financing or hedging services to any Entity that is not a Related Entity, provided that the group of any such Related Entities is primarily engaged in a business other than that of a Financial Institution: or
- the NFE meets all of the following requirements (a "non-profit NFE"):
 - It is established and operated in its jurisdiction of residence exclusively for religious, charitable, scientific, artistic, cultural, athletic, or educational purposes; or it is established and operated in its jurisdiction of residence and it is a professional organization, business league, chamber of commerce, labor organisation, agricultural or horticultural organization, civic league or an organization operated exclusively for the promotion of social welfare;
 - ✓ it is exempt from income tax in its jurisdiction of residence;
 - √ it has no shareholders or members who have a proprietary or beneficial interest in its income or assets;
 - the applicable laws of the NFE's jurisdiction of residence or the NFE's formation documents do not permit any income or assets of the NFE to be distributed to, or applied for the benefit of, a private person or non-charitable Entity other than pursuant to the conduct of the NFE's charitable activities, or as payment of reasonable compensation for services rendered, or as payment representing the fair market value of property which the NFE has purchased; and
 - ✓ the applicable laws of the NFE's jurisdiction of residence or the NFE's formation documents require that, upon the NFE's liquidation or dissolution, all of its assets be distributed to a Governmental Entity or other non-profit organisation, or escheat to the government of the NFE's jurisdiction of residence or any political subdivision.

Note: Certain entities (such as U.S. Territory NFFEs) may qualify for Active NFFE status under FATCA but not Active NFE status under the CRS.



"Central Bank"

"An institution that is by law or government sanction the principal authority, other than the government of the jurisdiction itself, issuing instruments intended to circulate as currency.

"Common Reporting Standard (CRS)"

CRS introduces requirements on top of other global and local implementation programs (e.g. FATCA, EUSD, QI) aiming at a uniform global standard of information exchange.

"Control"

"Control" over an Entity is generally exercised by the natural person(s) who ultimately has a controlling ownership interest (typically on the basis of a certain percentage (e.g. 25%)) in the Entity. Where no natural person(s) exercises control through ownership interests, the Controlling Person(s) of the Entity will be the natural person(s) who exercises control of the Entity through other means. Where no natural person(s) is/are identified as exercising control of the Entity through ownership interests, then under the CRS the Reportable Person is deemed to be the natural person who hold the position of senior managing official.

"Controlling Person(s)"

"Controlling Persons" are defined as the natural person(s) who exercise control over an entity. Where that entity is treated as a Passive Non-Financial Entity ("Passive NFE") then a Financial Institution is required to determine whether or not these Controlling Persons are Reportable Persons. This definition corresponds to the term "beneficial owner" described in Recommendation 10 and the Interpretative Note on Recommendation 10 of the Financial Action Task Force Recommendations (as adopted in February 2012).

The beneficial owners (individuals), who own or control 25%* or more of the legal entity

"Controlling Person of a trust"

In the case of a trust, the Controlling Person(s) are the settlor(s), the trustee(s), the protector(s) (if any), the beneficiary(ies) or class(es) of beneficiaries, or any other natural person(s) exercising ultimate effective control over the trust (including through a chain of control or ownership). Under the CRS the settlor(s), the trustee(s), the protector(s) (if any), and the beneficiary(ies) or class(es) of beneficiaries, are always treated as Controlling Persons of a trust, regardless of whether or not any of them exercises control over the activities of the trust.

Where the settlor(s) of a trust is an Entity then the CRS requires Financial Institutions to also identify the Controlling Persons of the settlor(s) and when required report them as Controlling Persons of the trust. In the case of a legal arrangement other than a trust, "Controlling Person(s) means persons in equivalent or similar positions

"Custodial Institution"

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

"Depository Institution"

The term "Depository Institution" means any Entity that accepts deposits in the ordinary course of a banking or similar business.

"Entity"

The term "Entity" means a legal person or a legal arrangement, such as a corporation, organisation, partnership, trust or foundation. This term covers any person other than an individual

"Financial Account"

A Financial Account is an account maintained by a Financial Institution. The term "Financial Account" includes; Depository/Investment Accounts, Custodial Accounts (accounts that includes one or more financial assets in favor of a third party), Insurance contracts with redemption value, Annuity Contracts in certain Investments Entities, any Equity or connected with debt right on the financial Institution.

"Financial Institution"

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

"Governmental Entity"

The government of a jurisdiction, any political subdivision of a jurisdiction (which, for the avoidance of doubt, includes a state, province, county, or municipality), or any wholly owned agency or instrumentality of a jurisdiction .



"Investment Entity"

The term "Investment Entity" means:

- (i) an Entity that primarily conducts as a business one or more of the following activities or operations for or on behalf of a customer:
- Trading in money market instruments (cheques, bills, certificates of deposit, derivatives, etc.); foreign exchange; exchange, interest rate and index instruments; transferable securities; or commodity futures trading;
- Individual and collective portfolio management; or
- Otherwise investing, administering, or managing Financial Assets or money on behalf of other persons.

Such activities or operations do not include rendering non-binding investment advice to a customer. (ii) an Entity the gross income of which is primarily attributable to investing, reinvesting, or trading in Financial Assets where the Entity is managed by another Entity that is a Depository Institution, a Custodial Institution, a Specified Insurance Company, or the first type of Investment Entity.

(iii)"Investment Entity located in a Non-Participating Jurisdiction and managed by another Financial Institution"
The term "Investment Entity located in a Non-Participating Jurisdiction and managed by another Financial Institution"
means any Entity the gross income of which is primarily attributable to investing, reinvesting, or trading in Financial
Assets if the Entity is (i) managed by a Financial Institution and (ii) not a Participating Jurisdiction Financial Institution.

"Investment Entity managed by another Financial Institution"

"An Entity is "managed by" another Entity if the managing Entity performs, either directly or through another service provider on behalf of the managed Entity, any of the activities or operations described in clause (i) above in the definition of 'Investment Entity'.

An Entity only manages another Entity if it has discretionary authority to manage the other Entity's assets (either in whole or part). Where an Entity is managed by a mix of Financial Institutions, NFEs or individuals, the Entity is considered to be managed by another Entity that is a Depository Institution, a Custodial Institution, a Specified Insurance Company, or the first type of Investment Entity, if any of the managing Entities is such another Entity.

"Internal Revenue Service (IRS)"

A US government agency responsible for tax collection and tax law enforcement

"Non-Reporting Financial Institution"

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

- a Governmental Entity, International Organisation or Central Bank, other than with respect to a payment that is derived from an obligation held in connection with a commercial financial activity of a type engaged in by a Specified Insurance Company, Custodial Institution, or Depository Institution;
- a Broad Participation Retirement Fund; a Narrow Participation Retirement Fund; a Pension Fund of a Governmental Entity, International Organisation or Central Bank; or a Qualified Credit Card Issuer;
- an Exempt Collective Investment Vehicle; or
- a Trustee-Documented Trust: a trust where the trustee of the trust is a Reporting Financial Institution and reports all information required to be reported with respect to all Reportable Accounts of the trust;
- any other defined in a countries domestic law as a Non-Reporting Financial Institution.

"Participating Jurisdiction"

A "Participating Jurisdiction" means a jurisdiction having concluded an agreement with Greece, pursuant to which this jurisdiction will provide and will also receive from Greece the information required set out in the Common Reporting Standard and that is identified in a published list.

"Participating Jurisdiction Financial Institution"

The term "Participating Jurisdiction Financial Institution means (i) any Financial Institution that is tax resident in a Participating Jurisdiction, but excludes any branch of that Financial Institution that is located outside of that jurisdiction, and (ii) any branch of a Financial Institution that is not tax resident in a Participating Jurisdiction, if that branch is located in such Participating Jurisdiction.

"Passive NFE"

Under the CRS a "Passive NFE" means any NFE that is not an Active NFE.

An Investment Entity located in a Non-Participating Jurisdiction and managed by another Financial Institution is also treated as a Passive NFE for purposes of the CRS. An entity for which 50% or more of its gross income for the preceding calendar year is Passive Income or for which 50% or more of its assets held at any time during the preceding calendar year are assets that produce or are held for the production of Passive Income.

"Passive Income"

Sources of income that could include but are not limited to:

- Dividends.
- Interest and certain returns from investments in insurance contracts,
- Rents and royalties other than those derived from an active trade or business
- Annuities
- Any property income
- •Net gains from transactions, including forwards and certain types of transactions in commodities
- •foreign currency exchange gains
- Net income from notional principal contracts



"Related Entity"

An Entity is a "Related Entity" of another Entity if either Entity controls the other Entity, or the two Entities are under common control. For this purpose, control includes direct or indirect ownership of more than 50% of the vote and value in an Entity.

"Reportable Account"

The term "Reportable Account" means a financial account kept with a Greek Financial Institution and held by one or more Reportable Persons or a financial account kept with a Greek Financial Institution and held by a Passive NFE with one or more Controlling Persons that is a Reportable Person in case that these are identified as such according to the due diligence procedures the Financial Institution is obliged to apply.

"Reportable Jurisdiction"

A Reportable Jurisdiction is a jurisdiction with which an obligation to provide financial account information is in place.

"Reportable Jurisdiction Person"

A Reportable Jurisdiction Person is an Entity that is tax resident in a Reportable Jurisdiction(s) under the tax laws of such jurisdiction(s) - by reference to local laws in the country where the Entity is established, incorporated or managed. An Entity such as a partnership, limited liability partnership or similar legal arrangement that has no residence for tax purposes shall be treated as resident in the jurisdiction in which its place of effective management is situated. As such if an Entity certifies that it has no residence for tax purposes it should complete the Form stating the address of its principal office.

Dual resident Entities may rely on the tiebreaker rules contained in tax conventions (if applicable) to determine their residence for tax purposes.

"Reportable Person"

A "Reportable Person" is defined as a "Reportable Jurisdiction Person", other than:

- a corporation the stock of which is regularly traded on one or more established securities markets;
- any corporation that is a Related Entity of a corporation described in clause (i);
- a Governmental Entity;
- an International Organization;
- a Central Bank; or
- a Financial Institution (except for an Investment Entity that is not Participating Jurisdiction Financial Institutions. Instead such entities are treated as Passive NFE's.)

"Resident for tax purposes"

. Generally, an Entity will be resident for tax purposes in a jurisdiction if, under the laws of that jurisdiction (including tax conventions), it pays or should be paying tax therein by reason of his domicile, residence, place of management or incorporation, or any other criterion of a similar nature, and not only from sources in that jurisdiction. For additional information on tax residence, please refer to your tax adviser or see the <u>OECD automatic exchange of information portal</u>.

"Specified Insurance Company"

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

"TIN" (including "functional equivalent")

The term "TIN" means Taxpayer Identification Number or a functional equivalent in the absence of a TIN. A TIN is a unique combination of letters or numbers assigned by a jurisdiction to an individual or an Entity and used to identify the individual or Entity for the purposes of administering the tax laws of such jurisdiction. Further details of acceptable TINs can be found at the OECD automatic exchange of information portal.

Certain jurisdictions do not issue a TIN. However, these jurisdictions often utilise some other high integrity number with an equivalent level of identification (a "functional equivalent", i.e. Business/company registration code/number).

"FATCA"

FATCA stands for the U.S. provisions commonly known as the Foreign Account Tax Compliance Act, which were enacted into U.S. law. FATCA's objective is to reduce tax evasion by U.S. individuals receiving income from financial assets held outside the United States. FATCA creates a new information reporting and withholding regime for payments made to certain non-U.S. financial institutions and other non-U.S. entities. FFI FATCA requires Foreign Financial Institutions (FFI) to report to the IRS information about financial accounts held by US taxpayers (US Persons), or by foreign entities (outside of U.S. jurisdiction), in which US taxpayers hold a substantial ownership interest.

"Place of effective management"

Place of effective management is defined as the place where key management and commercial decisions that are necessary for the conduct of business of an entity as a whole are, in substance made. 'Place of effective management' is an internationally recognized test for determination of residence of a company incorporated in a foreign jurisdiction. Most of the tax treaties entered into by Greece recognize the concept of 'place of effective management' for determination of residence of a company as a tie-breaker rule for avoidance of double taxation.