

CRS Self-Certification Form under Japanese Act on Special Provisions of the Income Tax Act, the Corporation Tax Act, and the Local Tax Act Incidental to Enforcement of Tax Treaties for Entity Account Holders

Instructions

Please read these instructions carefully before completing this form.

Citi offices located in countries that have adopted the Common Reporting Standard (CRS) are required to collect certain information about an account holder's tax residence status. Please note that Citi may be legally required to report certain information provided in this form and other financial information with respect to your financial account(s) to the tax authorities of the country where your account is maintained. In turn, the local tax authorities may exchange the reported information with the tax authorities in the country or countries in which you the Entity is a tax resident.

Please complete this form if you represent an entity Account Holder. Do not use this form for an Account Holder that is an individual, a sole proprietor or the decedent of an estate. Instead use the "CRS self-certification Form for Individuals".

A separate form is required for each entity that is an Account Holder. For purposes of CRS, the term "Account Holder" means a legal entity listed or identified as the holder of a Financial Account maintained at Citi. This is regardless of whether such entity is a flow-through entity for tax purposes.

For definitions of certain other terms relevant to the completion of this form, please see the Appendix to this form.

Items marked with an asterisk (*) indicate required information. This form is intended to request information only where such request is not prohibited by local law.

An authorised individual must sign the form on behalf of the Account Holder and indicate the capacity (officer title, director, partner or power of attorney, etc.) in which he/she is signing in Part 4.

This Form will remain valid unless there is a change in circumstances that makes this Form incorrect or incomplete. In that case, you must notify Citi within 3 months of any such change and provide us with an updated CRS Self-certification.

If the Account Holder is determined to be a Passive NFE, or an Investment Entity in a Non-Participating Jurisdiction that is a corporation or a trust having tax residence outside Japan, please identify the natural person(s) who exercise control over the entity by name in Part 2, section 2a and provide a CRS Self-certification Form for Controlling Persons for each controlling person. This information should be provided by all Investment Entity in a Non-Participating Jurisdiction that is a corporation or a trust having tax residence outside Japan, even if they also fall into a category of "Non-Reporting Financial Institution". The CRS Self-certification Form for Controlling Persons may be completed by the Account Holder or the Controlling Person.

Please note that this self-certification form is for CRS purposes only. Its completion is not a substitute for the completion of any IRS Form W-9, Form W-8 or self-certification that may otherwise be required for FATCA or other U.S. tax purposes.

As a financial institution, Citi does not provide tax advice to its customers. If you have any questions about determining the entity's tax residence status in any particular country, please contact your tax adviser or the local tax authority. You may obtain more information about CRS, including a list of countries that have signed agreements to automatically exchange information, and local tax laws on the OECD automatic exchange of information (AEOI) portal at www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/.

This Self-Certification may be electronically or digitally signed. The electronic signature must indicate that the form was electronically signed by a person authorized to do so (for example, with a time and date stamp and statement that the form has been electronically signed). An electronic signature is also acceptable if such signature is evidenced by an electronic or digital certificate.

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This self-certification form is for: (check one only) **new account**

pre-existing account

change in circumstances

(Please complete Parts 1-3 in BLOCK CAPITALS)

Part 1 – Identification of Account Holder

(Note: In case of a trust having tax residence outside Japan, please provide the information of the trust. For any other trust, please provide the information of the trustee)

A. Legal Name of Entity/Branch*

B. Country of incorporation or organisation

C. Current Residence Address

Line 1 (e.g. Building/Apt/Suite/Number/Street)*

Line 2 (e.g. Town/City/Province/County/State)*

Country *

Postal Code/ZIP Code*

D. Mailing Address (please only complete if different from the address shown in Section C above)

Line 1 (e.g. Building/Apt/Suite/Number/Street)

Line 2 (e.g. Town/City/Province/County/State)

Country

Postal Code/ZIP Code

E. Account Number (only required for certification of a pre-existing account)

F. Partner (please provide the information of the partner who opens the account if the entity identified in A. above is a partnership)

Partner Name

Partner Address

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Part 2 – Entity Type* *Provide the Account Holder's Status by ticking ONE of the following boxes in Section 1.*

1.(a) Financial Institution – Investment Entity

i. An Investment Entity in a Non-Participating Jurisdiction that is a corporation or a trust having tax residence outside Japan

(Note: if ticking this box 1(a)(i), please also complete sections 2(a) and 2(b) below for Controlling Persons)

ii. Other Investment Entity

(b) Financial Institution – Depository Institution, Custodial Institution or Insurance Company

(c) An Entity the stock of which is regularly traded on an established securities market or an Entity which is a related Entity of an Entity the stock of which is regularly traded on an established securities market

If ticking this box (c), please provide the name of an established securities market on which the stock is regularly traded:

If you are related to a publicly traded Entity, please provide the name of the Entity whose stock is publicly traded and with which you are related:

(d) i. A Government Entity or Central Bank

ii. An Entity wholly owned by foreign national or local government which meets certain requirements

(e) An International Organisation

(f) Other Entity – other than (a) to (e) or (g)

If ticking this box (f), please provide the name of entity type:

(g) Passive NFE ("Tokutei Hojin") (Note: if ticking this box 1(g), please also complete sections 2(a) and 2(b))

2. Controlling Persons: If you have ticked section 1(a)(i) or 1(g) above, then please:

a. Indicate the name of any Controlling Person(s) of the Account Holder:

b. Indicate the relationship between the Account Holder and the Controlling Person (owner (direct or indirect), senior management official, or controlling person by other means)

c. Provide a separate "CRS Self-Certification Form under Japanese Act on Special Provisions of the Income Tax Act, the Corporation Tax Act and the Local Tax Act Incidental to Enforcement of Tax Treaties for Controlling Persons" for each Controlling Person.*

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Part 3 – Country of Tax Residence and related Taxpayer Identification Number (TIN) or equivalent*

Please complete the following table indicating the Account Holder's tax residence country or countries (*i.e. where the entity is treated as a resident of the country for purposes of that country's income tax*) and the Account Holder's TIN (if any) for each country indicated. If the Account Holder is tax resident in more than three countries, please use a separate sheet. If the Account Holder is not tax resident in any jurisdiction (*e.g., because it is fiscally transparent*), please state so on line 1. Note - all jurisdictions of tax residence must be disclosed.

If a TIN is unavailable, please provide the appropriate reason **A**, **B** or **C**, as defined below:

Reason A - The country where the Account Holder is liable to pay tax does not issue TINs to its residents.

Reason B - The Account Holder is unable to obtain a TIN or equivalent number. (*If this reason is selected, please explain why the Account Holder is unable to obtain a TIN in the below table.*)

Reason C - No TIN is required because the tax residence jurisdiction that issued the TIN does not require a Financial Institution to collect and report the TIN.

Country of tax residence	TIN ※ An entity whose tax residence is Japan only needs to provide the Entity's Corporate Number if it is classified as a Passive NFE ("Tokutei Hojin") and the Entity's Controlling Person(s) is a tax resident of a jurisdiction other than Japan.	If no TIN is shown, enter Reason A, B or C
1		
2		
3		

If you selected **Reason B** above, explain in the following boxes why you are unable to obtain a TIN.

1	
2	
3	

Please explain the reason if the current residence address is different from the country of tax residence(s) listed above:

Please provide the country of tax residence or the entity type previously provided to us in case of change in a tax residence or entity type. If there was no previous country of tax residence, please state so. (This information is only required when submitting certification for change in circumstances.)

Other information: _____

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Part 4 – Declaration and Signature*

- 1. I declare that all statements made in this declaration are, to the best of my knowledge and belief, correct and complete.**
2. I acknowledge that the information provided on this Form regarding the Account Holder, as well as financial information (e.g., account balance or value, the amount of income or gross proceeds received) respecting the Financial Accounts to which this Form is applied may be reported to the tax authorities of the country in which this/these account(s) is/are maintained and exchanged with tax authorities of another country or countries in which the Account Holder may be a tax resident pursuant to a legal agreement between the competent authorities of these countries on the automatic exchange of information on Financial Accounts under the Common Reporting Standard (CRS).
3. I certify that I am authorised to sign for the Account Holder in respect of all the account(s) to which this form relates.
4. If there is a change in circumstances that affects the tax residence 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 on controlling persons identified in Part 2, section 2a), I understand that I am obligated to inform Citi of the change in circumstances within 3 months of its occurrence and to provide a suitably updated CRS self-certification.

Signature:* _____

Print name:* _____

Date:* _____

Note: Please indicate the capacity in which you are signing the form. If signing under a power of attorney please also attach a copy of the power of attorney.

Capacity: * _____

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Appendix of Defined Terms

Note: The following selected definitions are provided to assist you with the completion of this form. If you have any questions about substantive tax principles, please contact your tax adviser or the applicable tax authority.

“Central Bank Digital Currency” - any digital Fiat Currency issued by a Central Bank.

“Controlling Person(s)” - a natural person who exercises control over an entity. Where that entity is treated as a Passive Non-Financial Entity (“Passive NFE” or “*Tokutei Hojin*”) then a Financial Institution is required to determine whether or not these Controlling Persons are Reportable Persons. Under the Japanese Act, the term Controlling Person means:

- a) In case of a corporation under capital majority rule (“*Shihon Tasuketsu Hojin*”) that has any natural person(s) that is recognized as having over one fourth of the total voting rights directly or indirectly, such natural person(s)
- b) In case of a corporation under capital majority rule (except those described above) that has any natural person(s) that is recognized as exercising a predominant influence on the activities of the corporation, such natural person(s);
- c) In case of a corporation, other than a corporation under capital majority rule, that has any of the following natural person(s), such natural person(s):
 - natural person(s) who is recognized as entitled to receive dividend of profits or distribution of assets that exceeds one fourth of the total of the profits generated by the business of the corporation and the assets related to the business; or
 - natural person(s) who is recognized as exercising a predominant influence on the activities of the corporation through the relationship based on investment, loan, trading, etc.; or
- d) In case of a corporation that does not have such person(s) described above, any natural person(s) that is representative of the corporation and executes its business

“Crypto-Asset” - a digital representation of value that relies on a cryptographically secured distributed ledger or a similar technology to validate and secure transactions.

“Custodial Institution” - A Custodial Institution is an entity where, in the preceding three reporting periods, either (a) 20% or more of its gross revenue is attributable to custody services for financial assets and/or Relevant Crypto-Assets posted as collateral for derivative transactions, or (b) 50% or more of its gross income is attributable to the business of financial instruments or commodities futures.

“Entity” - 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 (i.e. a natural person).

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“Entity wholly owned by foreign national or local government which meets certain requirements” – an Entity which meet both (i) and (ii).

(i) The Entity's net earnings are credited to its own account or to the accounts of one or more Governmental Entities, however, except when it corresponds to any of A), B), C); and

- A) The programme activities are not performed for the general public with respect to the common welfare nor not relate to the administration of some phase of government.
- B) Income is considered to inure to the benefit of private persons if such persons are the intended to beneficiaries of a governmental programme
- C) Income is considered to inure to the benefit of private persons if the income is derived from the use of the Entity to conduct a commercial business, such as commercial banking business, that provides financial services to private persons.

(ii) The Entity's assets vest in one or more Governmental Entities upon dissolution.

“Exchange Transaction” - any (1) exchange between Relevant Crypto-Assets and Fiat Currencies; and (2) exchange between one or more forms of Relevant Crypto-Assets.

“Fiat Currency” – the official currency of a jurisdiction, issued by a jurisdiction or by a jurisdiction's designated Central Bank or monetary authority, as represented by physical banknotes or coins or by money in different digital forms, including bank reserves and Central Bank Digital Currencies. The term also includes commercial bank money and electronic money products (including Specified Electronic Money Products).

“Financial Account” – an account maintained by a Financial Institution and includes: Depository Accounts, Custodial Accounts; Equity and debt interests in certain Investment Entities, Cash Value Insurance Contracts; and Annuity Contracts.

“Financial Institution” – a Custodial Institution, a Depository Institution, an Investment Entity, or an Insurance Company.

“Investment Entity” – an entity managed by another Financial Institution that conducts asset management business, where 50% or more of its gross income in the preceding three reporting periods is attributable to investments in securities, derivatives, and/or Relevant Crypto-Assets.

“Participating Jurisdiction” - a jurisdiction (i) with which an agreement is in place pursuant to which it will provide the information set out in the CRS and required for the automatic exchange of financial account information, and (ii) which is identified in an OECD published list.

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“Passive NFE” (“Tokutei Hojin”) - Entity that is (i) a corporation or a trust having tax residence outside Japan and (ii) not any of the listed entities below:

- a) Publicly traded non-Financial Institution and Related Entity
- b) Government Entity, Central Bank, or International Organization
- c) Entity wholly owned by Government Entity, Central Bank or International Organization
- d) Non-profit organization defined by Japanese Corporation Tax Law (“Kokyo Hojin” or “Koeki Hojin”) excluding those conducting profit-making business
- e) Financial Institution
- f) Foreign Financial Institution or similar foreign institution (excluding an Investment Entity in a Non-Participating Jurisdiction)
- g) Holding company that only engages in management of subsidiaries
- h) Entity that primarily engages in finance business for Related Entities described in a)
- i) Entity where less than 50% of its gross income is passive income and less than 50% of total assets are assets that produce or are held for the production of passive income **or**
- j) 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, This exception is limited to 24 months from the date of the initial organization of the NFE;

“Related Entity” - An Entity is related to 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.

“Relevant Crypto-Asset” - any Crypto-Asset that is not a Central Bank Digital Currency, a Specified Electronic Money Product or any Crypto-Asset for which the Reporting Crypto-Asset Service Provider has adequately determined that it cannot be used for payment or investment purposes.

“Reportable Jurisdiction” - a jurisdiction (i) with which an agreement is in place pursuant to which there is an obligation to provide financial account information set forth in the CRS, and (ii) which is identified in a published list issued by Japanese government.

“Reportable Jurisdiction Person” - an Entity that is resident in a Reportable Jurisdiction(s) under the local tax laws of such country. Generally, an entity will be resident for tax purposes in a jurisdiction, if under the tax laws of that jurisdiction (including tax conventions), it pays or should be paying tax therein by reason of its domicile, residence, place of management or incorporation or any other criterion of a similar nature, and not only from sources in that jurisdiction. An Entity such as a partnership, limited liability partnership or similar legal arrangement that has no residence for tax purposes shall be treated as resident in the jurisdiction in which its place of effective management is situated. If another type of Entity certifies that it has no residence for tax purposes it should complete the CRS Self-certification 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” - is a “Reportable Jurisdiction Person”, other than:

- An Entity the stock of which is regularly traded on one or more established securities markets;
- any Entity that is a Related Entity of an Entity described immediately above;
- a Governmental Entity;
- an Entity wholly owned by foreign national or local government which meets certain requirements
- an International Organisation;
- a Central Bank; **or**
- a Financial Institution (except for an Investment Entity that is not a Participating Jurisdiction Financial Institution, which is treated as a Passive NFE.)

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“Resident for tax purposes” - generally means resident for tax purposes in a particular jurisdiction if, under the laws of that jurisdiction (including tax conventions), it pays or should be paying tax therein by reason of his domicile, residence, place of management or incorporation, or any other criterion of a similar nature, and not only from sources in that jurisdiction. An entity may be resident for tax purposes in two or more jurisdictions. In those circumstances, all jurisdictions of residence must be declared on the CRS Self-certification. 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. For additional information on tax residence, please contact your tax adviser or use the OECD AEOI Portal containing information on tax residence in Participating Jurisdictions at www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/.

“Specified Electronic Money Product” - any product that is:

- a digital representation of a single Fiat Currency;
- issued on receipt of funds for the purpose of making payment transactions;
- represented by a claim on the issuer denominated in the same Fiat Currency;
- accepted in payment by a natural or legal person other than the issuer; and
- by virtue of regulatory requirements to which the issuer is subject, redeemable at any time and at par value for the same Fiat Currency upon request of the holder of the product.

“TIN” - the 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. Some jurisdictions do not issue a TIN. However, these jurisdictions often utilise some other high integrity number with an equivalent level of identification (a “functional equivalent”). Examples of that type of number include, for Entities, a Business/company registration code/number.