Automatic Exchange of Information (AEI) Crypto-Asset Reporting Framework (CARF) Foreign Account Tax Compliance Act (FATCA)

Addendum to UBS self-certifications with additional explanations of AEI / CARF / FATCA terms for Switzerland

Please note: These definitions rely on the most common standards and definitions for the general application for AEI, CARF and FATCA in Switzerland. However, local rules may differ. Please consult the applicable local laws and any accompanying guidance in order to ensure that you apply the applicable version of any of these terms.

Account Holder (AEI- and FATCA-relevant only)

Account Holder means the person listed or identified as the holder of an account. A person (other than a Financial Institution) holding an account for the benefit of another person as an agent, a custodian, a nominee, a signatory, an investment advisor, an intermediary, or as a legal guardian, is not treated as the Account Holder. Instead, such other person is the Account Holder under AEI. The Account Holder definition under AEI is the same as under FATCA.

Active Entity (CARF-relevant only)

See "Other Active NFE / Other Active NFFE / Active Entity".

Active Non-Financial Entity (Active NFE) / Active Non-Financial Foreign Entity (Active NFFE) (AEI- and FATCA-relevant only)

The terms Active NFE (under AEI) or Active NFFE (under FATCA) mean an NFE / NFFE that meets the requirements to be classified as:

- Publicly traded Non-Financial Corporation and Related Entity (under AEI) / Publicly Traded NFFE or NFFE Affiliate of a Publicly Traded Corporation (under FATCA);
- Government Entity (under AEI) / Foreign Government (under FATCA);
- Central Bank (under AEI) / Foreign Central Bank (under FATCA);
- International Organization (under AEI and FATCA); or
- Other Active NFE (under AEI) / Other Active NFFE (under FATCA).

AEI Classification

The term AEI Classification means the categorization of an entity for AEI purposes (e.g. as a Financial Institution, an Active NFE or a Passive NFE).

Automatic Exchange of Information (AEI)

The AEI regime based on the OECD Common Reporting Standard requires Reporting Financial Institutions to report annually to their domestic tax authorities certain information regarding all accounts they maintain that have been identified as Reportable Accounts as a result of the application of the relevant due diligence procedures. The domestic tax authorities will then pass on the information to the tax authorities of the jurisdiction in which the Reportable Person is deemed to be resident for tax purposes.

Beneficial Owner (according to Swiss KYC / AML Regulations)

The Beneficial Owner is typically the natural person / operating company who, from an economic point of view, ultimately owns the assets deposited with the Financial Institution. For accounts maintained in Switzerland, the rules for the determination and identification of Beneficial Owners are outlined in the banks' code of conduct with regard to the exercise of due diligence (CDB). According to the CDB rules, Beneficial Owners must be identified on Forms A, K, S or T.

Branch

The term Branch (under AEI, CARF and FATCA) means a unit, business, or office of an entity that is treated as a branch under the regulatory regime of a jurisdiction or that is otherwise regulated under the laws of a jurisdiction as separate from other offices, units, or branches of the entity.

CARF Classification

The term CARF classification refers to the categorization of an entity for CARF purposes (e.g. as an Excluded Person, Active Entity or Other Entity).

Central Bank / Foreign Central Bank

The terms Central Bank (under AEI and CARF) or Foreign Central Bank (under FATCA) mean an institution that is by law or government sanction the principal authority, other than the government of the jurisdiction (under FATCA: non-US jurisdiction only) itself, issuing instruments intended to circulate as currency. Such an institution may include an instrumentality that is separate from the government of the jurisdiction, whether or not owned in whole or in part by the jurisdiction.

Certified Deemed-Compliant FFI (FATCA-relevant only)

The term Certified Deemed-Compliant FFI (under FATCA) means an FFI that qualifies for such status based on relevant US Treasury Regulations.

Collective Investment Vehicle (FATCA-relevant only)

The term Collective Investment Vehicle (under FATCA) means an Investment Entity that:

- Is established in an IGA jurisdiction;
- Is regulated as a collective investment vehicle; and
- All of the interests in which (including debt interests in excess of USD 50 000) are held by or through one or more Exempt Beneficial Owners, Active NFFEs, US Persons that are not Specified US Persons, or Financial Institutions that are not Non-Participating Financial Institutions.

Common Reporting Standard (CRS)

The CRS contains the reporting and due diligence standard that underpins the OECD Standard for the Automatic Exchange of Financial Account Information (AEI). In order to ensure a level playing field, each jurisdiction that participates in AEI must translate the CRS requirements into domestic law.

Controlling Person

The term Controlling Persons (as defined under AEI, CARF, and FATCA) refers to the natural persons who exercise control over an entity. For accounts maintained in Switzerland, the definition of Controlling Persons is fully aligned with the definition of Beneficial Owners under Swiss KYC / AML regulations. Consequently, the term Controlling Persons generally refers to any natural person identified on Forms A, K, S or T.

Controlling US Person (FATCA-relevant only)

The term Controlling US Person means a Controlling Person that is a Specified US Person.

Crypto-Asset Reporting Framework (CARF)

The OECD's CARF regime requires Reporting Crypto-Asset Service Providers (RCASPs) to apply due diligence procedures to identify Users and Controlling Persons that are resident in a CARF Reportable Jurisdiction. With respect to any such person, RCASPs must report annually to their domestic tax authorities certain information regarding their transactions and transfers of Crypto-Assets that fall within the scope of CARF. The domestic tax authorities will then exchange this information with the tax authorities of the jurisdiction in which the Reportable User is deemed to be resident for tax purposes.

Entity

The term entity (under AEI, CARF and FATCA) means a legal person or a legal arrangement, such as a corporation, organization, partnership, trust or foundation. However, it does not include an individual or sole proprietorship.

Excluded Person (CARF-relevant only)

The term Excluded Person means an entity with one of the following CARF statuses:

- Publicly traded corporation
- Related Entity of a publicly traded corporation;
- Government Entity;
- Central Bank;
- International Organization; or
- Financial Institution other than a PMIE.

Exempt Retirement Plan (FATCA-relevant only)

The term Exempt Retirement Plan (under FATCA) means an entity that meets the requirements for any of the following sub-categories as those are defined in an applicable IGA or relevant US Treasury Regulations:

- Treaty-Qualified Retirement Fund;
- Broad Participation Retirement Fund;
- Narrow Participation Retirement Fund;
- Pension Fund of an Exempt Beneficial Owner; or
- Investment Entity Wholly Owned by Exempt Beneficial Owners.

FATCA Beneficial Owners

A Beneficial Owner according to FATCA is any person:

a) Owning stock of a corporation or profit / capital interests in a partnership; and / or

b) Owning debt interests (e.g. bonds or loans) of a corporation or partnership (except debt interests owned by FATCA compliant Financial Institutions) in excess of USD 50'000.

FATCA Classification

The term FATCA classification means the categorization of an entity for FATCA purposes (e.g. as Participating FFI, Reporting IGA FFI, Deemed-Compliant FFI, Nonreporting IGA FFI, Exempt Beneficial Owner, Active NFFE or Passive NFFE).

FATCA Sponsor

The term FATCA Sponsor (under FATCA) means an entity that:

- Is authorized to act on behalf of Sponsored Investment Entity or Sponsored, Closely Held Investment Vehicle (e.g. a fund manager, trustee, corporate director, or managing partner); and
- Agreed to perform all FATCA due diligence, withholding, reporting and other obligations with respect to the Financial Account held by the Sponsored Investment Entity or Sponsored, Closely Held Investment Vehicle.

With respect to a Sponsored, Closely Held Investment Vehicle, a FATCA Sponsor must have a FATCA classification as a Reporting US Financial Institution, Participating FFI, Reporting Model 1 FFI, or Reporting Model 2 FFI.

Financial Institution / Foreign Financial Institution

The terms Financial Institution (under AEI and CARF) or Foreign Financial Institution (under FATCA) mean an entity (under FATCA: a non-US entity) that is a:

- Depository Institution;
- Custodial Institution;
- Investment Entity;
- Holding Company or Treasury Center (only relevant under FATCA for entities located outside an IGA jurisdiction); or
- Specified Insurance Company.

Please see the relevant domestic guidance and the CRS for further classification definitions that apply to Financial Institutions. Typical examples of Financial Institutions are banks, funds, broker-dealers, custodians, trust companies, and life insurance companies.

Foreign Account Tax Compliance Act (FATCA)

The term FATCA stands for Foreign Account Tax Compliance Act. The FATCA provisions were enacted into US law as part of the

Hiring Incentives to Restore Employment (HIRE) Act on 18 March 2010. Based on FATCA, Foreign Financial Institutions are required to identify US Accounts and report them, directly or indirectly through their domestic tax authorities, to the US Internal Revenue Service (IRS). Foreign Financial Institutions and their clients that do not comply with the FATCA requirements are subject to a 30 percent withholding tax on payments from US Securities.

Global Intermediary Identification Number (GIIN) (FATCA-relevant only)

The term GIIN means the identification number that is assigned by the IRS **inter alia** to Entities with the following FATCA statuses upon registration with the IRS for FATCA purposes:

- Participating FFI;
- Reporting Model 1 FFI;
- Reporting Model 2 FFI;
- Registered Deemed-Compliant FFI;
- Sponsored Investment Entity and Controlled Foreign Corporation [starting as of 1 January 2017 and requirements may vary depending on location of Entity];
- FATCA Sponsor; and
- Trustee of a Trustee-documented Trust.

Government Entity / Foreign Government

The terms Government Entity (under AEI and CARF) and Foreign Government (under FATCA) mean the government of a jurisdiction (under FATCA: non-US jurisdiction), any political subdivision of a jurisdiction (which, for the avoidance of doubt, includes a state, province, county, or municipality), or any wholly owned agency or instrumentality of a jurisdiction or of any one or more of the foregoing. This category is comprised of the integral parts, controlled entities, and political subdivisions of a jurisdiction.

Intergovernmental Agreement (IGA) (FATCA-relevant only)

The term IGA means an agreement or arrangement between the US and a non-US government governing the implementation of FATCA in such non-US jurisdiction. An IGA modifies the provisions of FATCA in order to eliminate potential conflict of law issues and to reduce the administrative burden.

Intermediary

An Intermediary means a person that acts as an agent, custodian, broker, nominee, signatory, investment advisor, or in a similar capacity for the benefit or account of another person.

International Organization

The term International Organization (under AEI, CARF and FATCA) means any international organization or wholly owned agency or instrumentality thereof. This category includes any intergovern-mental organization (including a supranational organization) (1) that is comprised primarily of governments (under FATCA: Non-US Governments); (2) that has in effect a headquarters or substantially similar agreement with the jurisdiction; and (3) the income of which does not inure to the benefit of private persons.

Investment Advisor and Investment Manager (FATCA-relevant only)

The term Investment Advisor and Investment Manager (under FATCA) means an FFI that:

- Qualifies as FFI solely because conducts as a business one or more of the following activities or operations for or on behalf of a client: (i) trading in financial instruments; (ii) individual or collective portfolio management; or (iii) otherwise investing, administering, or managing funds, money, or Financial Assets on behalf of other persons; and
- Does not maintain Financial Accounts.

Mailing Address

The term Mailing Address means any physical delivery address for client communication, e.g. letters or account statements.

Non-Financial Entity (NFE) / Non-Financial Foreign Entity (NFFE) (AEI- and FATCA-relevant only)

The terms NFE (under AEI) or NFFE (under FATCA) mean an entity (under FATCA: a non-US entity) that is not a Financial Institution / Foreign Financial Institution.

Non-Participating Foreign Financial Institution (FATCA-relevant only)

The term Non-Participating Foreign Financial Institution (under FATCA) means any Foreign Financial Institution other than a:

- Participating FFI;
- Reporting Model 1 FFI;
- Reporting Model 2 FFI;
- Deemed-Compliant FFI;
- Owner-documented FFI;
- Nonreporting IGA FFI; or
- Exempt Beneficial Owner.

Non-Participating Jurisdiction (AEI-relevant only)

From the perspective of a jurisdiction that has implemented AEI, the term Non-Participating Jurisdiction (under AEI) means another jurisdiction that is not a Participating Jurisdiction.

Non-Profit Organization

The term Non-Profit Organization (under AEI, CARF and FATCA) means an entity that meets all of the following requirements:

- It is not a Financial Institution;
- 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 organization, 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 entity's jurisdiction of residence or the entity's formation documents do not permit any income or assets of the entity to be distributed to, or applied for the benefit of, a private person or non-charitable entity other than pursuant to the conduct of the entity's charitable activities, or as payment of reasonable compensation for services rendered,

or as payment representing the fair market value of property which the entity has purchased; and

- The applicable laws of the entity's jurisdiction of residence or the entity's formation documents require that, upon the entity's liquidation or dissolution, all of its assets be distributed to a Government Entity or other Non-Profit Organization, or escheat to the government of the entity's jurisdiction of residence or any political subdivision thereof.

Nonreporting IGA FFI (FATCA-relevant only)

The term Nonreporting IGA FFI (under FATCA) means any entity in an IGA jurisdiction that:

- Is described in Annex II of the IGA between such jurisdiction and the US as a Nonreporting IGA FFI; or
- Otherwise qualifies as a Deemed-Compliant FFI or an Exempt Beneficial Owner under relevant US Treasury Regulations.

Other Active NFE / Other Active NFFE / Active Entity

The terms Other Active NFE (under AEI), Other Active NFFE (under FATCA) and Active Entity (under CARF) mean an NFE/NFFE/entity that meets any of the following criteria:

- Less than 50% of the entity'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 entity during the preceding calendar year or other appropriate reporting period are assets that produce or are held for the production of Passive Income;
- The entity is not yet operating a business and has no prior operating history, but is investing capital into assets with the intent to operate a business other than that of a Financial Institution, provided that the entity does not qualify for this exception after the date that is 24 months after the date of the initial organization of the entity;
- The entity 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 entity 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 entity is an Excepted NFFE as described in relevant US Treasury Regulations (under FATCA only).

Other Entity (CARF-relevant only)

The term "Other Entity" means an entity other than an Active Entity or Excluded Person under CARF.

Owner-documented Foreign Financial Institution (OdFFI) (FATCA-relevant only)

The term OdFFI (under FATCA) means a Foreign Financial Institution that:

- Is a Foreign Financial Institution solely because it is an Investment Entity;
- Is not owned by or in an Expanded Affiliated Group with any FFI that is a Depository Institution, Custodial Institution, or Specified Insurance Company;
- Does not maintain a Financial Account for any Non-Participating Foreign Financial Institution;
- Provides the designated withholding agent (e.g. UBS) with documentation identifying itself as an OdFFI, an Owner Reporting Statement and valid documentation for each person identified on the Owner Reporting Statement;
- Has a designated withholding agent (e.g. UBS) which agreed to report, directly or indirectly through its domestic tax authorities, to the IRS all relevant information with respect to each Specified US Person listed on the Owner Reporting Statement (subject to certain exception for indirect owners).

Participating Jurisdiction (AEI-relevant only)

The term Participating Jurisdiction means another jurisdiction with which the jurisdiction of the Financial Institution has an AEI agreement in place. A list of Participating Jurisdictions from the perspective of Switzerland is available at ubs.com/aei-ch.

Passive Income

Subject to certain limitations based on commercial operations (e.g. for specified dealers), Passive Income would generally be considered to include the portion of gross income that consists of:

- Dividends (including substitute dividends);
- Interest (including income equivalent to interest);
- Rents and royalties;
- Annuities;
- The excess of gains over losses from the sale or exchange of Financial Assets that gives rise to the passive income described above or of Relevant Crypto-Assets;
- The excess of gains over losses from transactions (including futures, forwards, options, and similar transactions) in any Financial Assets or Relevant Crypto-Assets;
- Income derived from Relevant Crypto-Assets;
- The excess of foreign currency gains over foreign currency losses;
- Net income from swaps or notional principal contracts; or
- Amounts received under Cash Value Insurance Contracts.

Passive Non-Financial Entity (Passive NFE) / Passive Non-Financial Foreign Entity (Passive NFFE)

The terms Passive NFE (under AEI) and Passive NFFE (under FATCA) mean an NFE / NFFE that is not an Active NFE / Active NFFE.

Professionally Managed

An entity is considered to be Professionally Managed if another Financial Institution performs, either directly or through another service provider, any of the following activities or operations on behalf of the managed entity: (i) trading in financial instruments; (ii) individual or collective portfolio management; or (iii) otherwise investing, administering, or managing funds, money, Financial Assets, or Relevant Crypto-Assets. However, an entity is not Professionally Managed if the managing Financial Institution does not have discretionary authority to manage the entity's assets (in whole or part). Where an entity is managed by a mix of Financial Institutions and other persons, the entity is considered to be Professionally Managed.

Professionally Managed Investment Entity

The term Professionally Managed Investment Entity (under AEI, CARF and FATCA) means an entity (under FATCA: a non-US entity) that meets the following requirements:

- its gross income is primarily attributable to investing, reinvesting, or trading in financial assets or Relevant Crypto-Assets; and
- its assets are managed by another Financial Institution (e.g. bank, financial intermediary, asset/fund manager, life insurance company, broker/dealer, corporate trustee or other fiduciary etc.), or it has entered into a discretionary portfolio management agreement with UBS or any 3rd party Financial Institution.

Whether an entity is considered a Professionally Managed Investment Entity is generally determined under the applicable law and guidance of the entity's country of residence; exceptions, reflecting less restrictive or more restrictive rules may apply.

Publicly traded Non-Financial Corporation and Related Entity / Publicly traded NFFE or NFFE Affiliate of a Publicly Traded Corporation

The terms Publicly traded Non-Financial Corporation and Related Entity (under AEI and CARF) and Publicly traded NFFE or NFFE Affiliate of a Publicly Traded Corporation (under FATCA) mean an entity that is an NFE / NFFE (only for AEI and FATCA) and:

- The stock of which is regularly traded on an established securities market; or
- That is a Related Entity of an entity the stock of which is regularly traded on an established securities market.

An "established securities market" means an exchange that is officially recognized and supervised by a governmental authority in which the market is located and that has an annual value of shares traded on the exchange (or a predecessor exchange) exceeding USD 1 000 000 000 during each of the three calendar years immediately preceding the calendar year in which the determination is being made. Examples include the SIX Swiss Exchange and the BX Berne eXchange.

Relevant Crypto-Asset (AEI- and CARF-relevant only)

These are instruments in scope of CARF. Typically, a Relevant Crypto-Asset is a digital representation of value that relies on a cryptographically secured distributed ledger (e.g. blockchain) to validate and secure transactions.

Reportable Account (AEI-relevant only)

The term Reportable Account (under AEI) means an account held by:

- One or more Reportable Persons; or
- A Passive NFE or a Professionally Managed Investment Entity resident in a Non-Participating Jurisdiction with one or more Controlling Persons that is a Reportable Person.

Reportable User (CARF-relevant only)

The term Reportable User means a User that is a Reportable Person.

Reportable Jurisdiction (AEI- and CARF-relevant only)

The term Reportable Jurisdiction means another jurisdiction with which the jurisdiction of the Financial Institution has an AEI and/or CARF agreement in place pursuant to which there is an obligation to provide information on Financial Accounts and/or transactions with Relevant Crypto-Assets on an automatic basis. A list of Reportable Jurisdictions from the perspective of Switzerland is available at ubs.com/aei-ch.

Reportable Person (AEI- and CARF-relevant only)

The term Reportable Person means an individual or entity that is resident for AEI and/or CARF purposes in a Reportable Jurisdiction, other than an entity with one of the following AEI/CARF statuses:

- Publicly traded corporation
- Related Entity of a publicly traded corporation;
- Government Entity;
- Central Bank;
- International Organization; or
- Financial Institution (for CARF with the exception of PMIEs).

Reporting Crypto-Asset Service Provider (RCASP) (CARF-relevant only)

The term Reporting Crypto-Asset Service Provider refers to an individual or entity that, as a business, provides a service facilitating Exchange Transactions for or on behalf of clients. This includes acting as a counterparty or intermediary to such Exchange Transactions, or by making a trading platform available.

Reporting Financial Institution (AEI-relevant only)

The term Reporting Financial Institution (under AEI) means a Financial Institution that is resident in a jurisdiction that has implemented AEI under local law and is subject to applicable due diligence and reporting obligations.

Residence Address

The term Residence Address means the address of a person's permanent residence or domicile. In general, an in-care-of address or a post office box is not a residence address, unless:

- It is a post office box that forms part of an address together with, e.g. a street, an apartment or suite number, or a rural route, and thus clearly identifies the actual residence of the person; or
- Other special circumstances apply such as that of military personnel.

Self-certification

The term self-certification means a certification by the Account Holder, User or Controlling Person that provides his / her / its status under AEI, CARF and FATCA and any other information that may be reasonably requested by UBS to fulfil its AEI, CARF and FATCA obligations, such as whether the Account Holder / User is resident for tax purposes in a Reportable Jurisdiction (under AEI and/or CARF) or the US (under FATCA) and, in the case of an entity, its AEI, CARF or FATCA classification.

Specified US Person (FATCA-relevant only)

The term Specified US Person (under FATCA) means any US Person (US entity and US individuals), except for certain entities excluded from the definition according to an applicable IGA or relevant US Treasury Regulations. A natural person is considered a US Person, if he / she:

- Is a US citizen (including dual or multiple citizen);
- Is in possession of a US Green Card (irrespective of expiry date);

- Meets the Substantial Presence Test (i.e. physical presence in the United States on at least 31 days during the current calendar year and 183 days during the three year period that includes the current calendar year and the two calendar years immediately before; to satisfy the 183 days requirement, count
  (i) all of the days of presence in the current year,
  (ii) one-third of the days of presence in the first year before the current year, and
  (iii) one-sixth of the days of presence in the second year before the current year); or
- Is a US resident because of any other reason (e.g. being a non-US spouse filing jointly a US tax return with a US spouse or relinquishing US citizenship or long-term permanent residency in the US.

Sponsored, Closely Held Investment Vehicle (FATCA-relevant only)

The term Sponsored, Closely Held Investment Vehicle (under FATCA) means a Foreign Financial Institution that:

- Is a Foreign Financial Institution solely because it is an Investment Entity;
- Is not a Qualified Intermediary, Withholding Foreign Partnership, or Withholding Foreign Trust pursuant to relevant US Treasury Regulations;
- Has twenty or fewer individuals owning all of the debt interests and Equity Interests in the Investment Entity (disregarding debt interests owned by certain FFIs and Equity Interests owned by another Sponsored, Closely Held Investment Vehicle that owns 100 percent of the Equity Interests in the Investment Entity);
- Does not hold itself out as an investment vehicle for unrelated parties (criterion not applicable in all jurisdictions);
- Has a FATCA Sponsor with the FATCA classification as a Reporting US Financial Institution, Participating FFI, Reporting Model 1 FFI, or Reporting Model 2 FFI, that is authorized to act on behalf of the Investment Entity (e.g. a fund manager, trustee, corporate director, or managing partner) and agreed to perform all FATCA due diligence, withholding, reporting and other obligations with respect to the Financial Account held by the Investment Entity.

Sponsored Investment Entity (FATCA-relevant only)

The term Sponsored Investment Entity (under FATCA) means a Foreign Financial Institution that:

- Is an Investment Entity;
- Is not a Qualified Intermediary, Withholding Foreign Partnership, or Withholding Foreign Trust pursuant to relevant US Treasury Regulations; and
- Has a FATCA Sponsor that is authorized to act on behalf of the Investment Entity (e.g. a fund manager, trustee, corporate director, or managing partner) and agreed to perform all FATCA due diligence, withholding, reporting and other obligations with respect to the Financial Account held by the Investment Entity.

Taxpayer Identification Number (TIN)

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 and / 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 utilize some other high integrity number with an equivalent level of identification (a "functional equivalent"). Examples of that type of number include, for individuals, a social security/insurance number, citizen/personal identification/service code/number, and resident registration number. Information regarding TINs in different jurisdictions are available on the OECD AEOI Portal at oecd.org.

Tax Residence

The determination of a person's tax residence is based on the tax laws of any relevant jurisdictions. The domestic tax laws of any relevant jurisdictions define the conditions under which a person has to be treated as fiscally resident and consequently is subject to full tax liability. In general, a person should be treated as tax resident in any jurisdiction in which it is subject to tax by reason of their domicile, residence, place of management or incorporation, or any other criterion of a similar nature, and not only because it receives income from sources in that jurisdiction. Dual residents may **not** rely on the tiebreaker rules contained in tax conventions (if applicable) to solve cases of double residence for determining their residence for tax purposes for AEI and CARF. Instead, such dual residents must certify their Tax Residence in all jurisdictions where they are tax resident according to the domestic tax laws.

Under AEI and CARF, special rules apply to certain Entities:

- Fiscally transparent entities (i.e. partnerships, limited liability partnerships or similar legal arrangements) that do not have a residence for tax purposes are considered to be resident for AEI and CARF purposes in the jurisdiction in which their place of effective management or their principal office is situated;
- Trusts, are generally considered to be resident for AEI and CARF purposes in the jurisdiction of Tax Residence of each of their trustee(s), unless such trusts are tax resident under the laws of any jurisdiction; and
- Branches are considered to be resident for AEI and CARF purposes in the jurisdiction of Tax Residence of the headquarter entity of which they are a branch.

Trustee-documented Trust (FATCA-relevant only)

The term Trustee-documented Trust (under FATCA) means a trust that:

- Is a Foreign Financial Institution;
- Is established under the laws of an IGA jurisdiction (provided such status is foreseen in the Annex II of such jurisdiction's IGA); and
- Has a trustee that is a Reporting US Financial Institution, Participating FFI, Reporting Model 1 FFI, or Reporting Model 2 FFI and reports all information required to be reported pursuant to the IGA with respect to all US Reportable Accounts of the trust.

US Entities (FATCA-relevant only)

The term US Entities (under FATCA) means US corporations, US partnerships and US trusts.
A corporation or partnership is generally considered a US corporation or US partnership if it is created or organized in the United States or under the law of the United States or of any State. A trust is considered to be a US trust if (i) a court within the United States is able to exercise primary supervision over the administration of the trust, and (ii) one or more US Persons have the authority to control all substantial decisions of the trust.

US Securities (FATCA-relevant only)

In general, the term US Securities (under FATCA) means equity interests in US companies, bonds and investment funds from US issuers. A non-US investment fund (e.g. Luxembourg SICAV) generally is not considered a US Security under FATCA.

User (CARF-relevant only)

The term User refers to an individual or entity that is a client for purposes of carrying out transactions with Relevant Crypto-Assets. An individual or entity, other than a Financial Institution or an RCASP, acting as a User for the benefit or account of another individual or entity as an agent, custodian, nominee, signatory, investment advisor, or intermediary, is not treated as a User. Instead, such other individual or entity is treated as the User.

© UBS 2025. The key symbol and UBS are among the registered and unregistered trademarks of UBS. All rights reserved.