

**Sands Capital Funds plc (the "Fund")**

Sands Capital Funds plc  
C/o Northern Trust International Fund Administration Services (Ireland) Limited  
2nd Floor, Block A, City East Plaza, Towlerton, Ballysimon, Limerick, V94 X2N9, Ireland  
Phone: +353 1 434 5122  
Fax: +353 1 553 9409  
Email: [Sandscapital\\_ta@ntrs.com](mailto:Sandscapital_ta@ntrs.com) (queries only)

**This duly signed Account Opening Form together with full Anti-Money Laundering (AML) Due Diligence Documentation (as per Appendix 6) and a valid signed FATCA/CRS forms are required before an account can be opened.** The original signed Account Opening Form together with original signature list (if applicable) and supporting copy bank statement must be returned to the Administrator's address to complete the account registration process.

Once signed Account Opening Form and full **AML Due Diligence Documentation** is received, the Administrator will send the account number confirmation to the authorised contact(s) upon which you can **then** place dealing instructions (see Appendix 1 for dealing information, Appendix 2 for payment details and Appendix 3 for Subscription Form). The account number must be specified on all forms to place transactions. **Subscription instructions and proceeds must not be forwarded until the account number confirmation is issued to you by the Administrator. Please note this may take up to 5 Business Days. Any subscription instructions or proceeds received as part of the account opening form will be rejected.**

You should post this Account Opening Form to the address set out above or it should be sent by facsimile to the Fund at +353-1-553-9409 (in which case the original Account Opening Form and supporting documentation (where required) must then also be forwarded to the Administrator at the address set out above.

**Incomplete Account Opening Forms (where compulsory information<sup>1</sup> and AML verification documents have not been provided in advance) will be rejected and any subscription monies received will be returned.** If an application is rejected, the Administrator at the cost and risk of the Applicant will, subject to any applicable laws, return application monies or the balance thereof, without interest, expenses or compensation by electronic transfer to the account from which it was paid (less any applicable bank charges where applicable).

**Neither the Prospectus for Sands Capital Funds plc (the "Fund"), as may be amended from time to time (the "Prospectus") nor this Account Opening Form constitutes an offer or solicitation to anyone in any jurisdiction in which such offer or solicitation is not authorised.**

Defined terms used in this Account Opening Form are those used in the Prospectus (unless otherwise defined herein or unless the context otherwise requires).

***Please complete this form in blue or black ink and use BLOCK CAPITALS where possible.***

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<sup>1</sup> Please note compulsory data that is required is name, address, and Tax details.

**Important notes regarding instructions issued to the Administrator via email**

- If you wish to send the Administrator instructions in respect of the shares of the Fund in portable document format ("PDF") or commonly used equivalent scanned form which is transmitted to the Administrator via email, then the terms as set out below will apply to the investor's account.
- **IT IS IMPORTANT THAT THE INVESTOR READS THESE TERMS AND CONDITIONS OF SERVICE CAREFULLY.**
- By completing the appropriate documentation (e.g. original subscription forms, additional subscription forms, transfer/switch requests or redemption forms) and instructing the Administrator in respect of the shares of the Fund via email, the investor will have accepted the following Terms and Conditions of Service.
- **A. Procedure for PDF Instructions**
  1. The email address to submit PDF instructions [SandsCapitalTAInstructions@ntrs.com](mailto:SandsCapitalTAInstructions@ntrs.com). **This address is to be solely used for sending PDF instructions via email in respect of the shares in the Fund.**
  2. The investor shall ensure that the PDF instruction is signed by properly authorised persons, scanned and attached to a **blank email** which is addressed to [SandsCapitalTAInstructions@ntrs.com](mailto:SandsCapitalTAInstructions@ntrs.com).
  3. Please ensure that the investor blank e-mail does not contain any text or non-text items including but not limited to logos.
  4. Each blank e-mail sent to the email address specified above may only include **one** PDF file attachment. However, the single PDF file attachment may contain multiple instructions in relation to shares in more than one sub-fund of the Fund (each a "**Sub-Fund**"). A blank e-mail with multiple PDF attachments will be rejected by the Administrator.
  5. PDF instructions received without the scanned PDF form attached will not be accepted.
  6. Upon receipt of an email with the scanned PDF instruction, the Administrator will send the investor a task number by auto-response.
    - a. The task number acknowledges receipt of the investor's instruction.
    - b. The task number is not confirmation of placement of the instruction.
    - c. The Administrator must be in receipt of the instruction prior to the relevant dealing deadline as set out in the Prospectus. The Administrator will not be responsible for any delays in receipt.
    - d. If the investor does not receive a task number by auto response, it is the investor's responsibility to contact the Administrator by telephone (details confirmed within the application form) to confirm that the Administrator has received the investor's instruction.
  7. If the investor sends the Administrator a PDF dealing instruction in respect of the shares in the Fund to a mailbox other than specified above, the Administrator will reject the instruction and/or the deal will not be placed. Notification of rejection may not be given prior to the dealing cut off.

8. In cases where the investor has supplied the Administrator with a “group” email address, the Administrator will have fully discharged its responsibilities where it has sent any communication to this “group” address.
9. The investor should not send a duplicate instruction by alternative means to the Administrator as this could lead to a duplicate e.g. deals being placed in error.
10. The investor is not obliged to instruct in this manner.

➤ **B. General Terms and Conditions of Service:**

1. Email is not a secure form of communication and may be subject to interception, interruption, corruption, distortion, non-delivery, loss, may not be confidential, secure or error free and may contain viruses. Using and relying on email involves increased risk of fraud and of miscommunications including those due to a telecommunications system or equipment failure, misdirected communications or illegibility of the instructions or documents and the investor will bear the risks if the investor wishes to conduct the investor’s dealings using email.
2. The Administrator is authorised and instructed to accept and execute any instructions in respect of shares in the Fund given by the investor in PDF form or by email. The Administrator will rely conclusively upon, and neither the Fund nor the Administrator shall incur liability in respect of any action taken upon any instruction believed in good faith to be genuine.
3. Neither the Fund nor the Administrator will be responsible or liable for the authenticity of instructions received from the investor or any authorised person and may rely upon any instruction from any such person representing himself to be a duly authorised person reasonably believed by the Administrator to be genuine.
4. Neither the Fund nor the Administrator will accept responsibility or liability of any nature whatsoever arising out of or in connection with instructions given by the investor in PDF form or by email, including without limitation, the investor’s use of an incorrect email address, failure of the investor’s transmission, interception, alteration or corruption of the investor’s email transmission, non-receipt of the investor’s electronic instruction, failure of technical infrastructure, error, omission, interruption, deletion, defect, delay in operation or transmission, computer virus, communication line failure, or any allotment, switch or redemption or other action taken in good faith by the Administrator upon any electronic instruction. In addition, neither the Fund nor the Administrator will be liable for any failure to act upon electronic instructions due to equipment failure or for any cause that is beyond the control of the Administrator.

## Account Opening Form Guide

<b>Section 1: Registration Details (this section must be completed)</b> .....	<b>6</b>
<b>Section 2: Contact Details (if applicable)</b> .....	<b>8</b>
<b>Section 3: Bank Details (this section must be completed)</b> .....	<b>8</b>
<b>Section 4: Investor AML Due Diligence Information (section must be completed by all applicants)</b> .....	<b>10</b>
<b>Section 5: Agent Information (if applicable)</b> .....	<b>13</b>
<b>Section 6: Investor Tax Residency (this section must be completed)</b> .....	<b>14</b>
<b>Section 7: FATCA &amp; CRS (this section must be completed by all applicants)</b> .....	<b>15</b>
<b>Section 8: Representations and Warranties (this section must be completed by all applicants)</b> .....	<b>25</b>
<b>Section 9: Appendices</b> .....	<b>33</b>
Appendix 1 - Dealing Procedure.....	33
Appendix 2 - Payment details .....	34
Appendix 3 - Subscription Form .....	35
Appendix 4 - Redemption Form .....	39
Appendix 5 - Data Protection Notice to Investors .....	41
Appendix 6 – Investor AML Due Diligence Documentation Requirements (all investors- provision in advance).....	46

**Administrator Details****Postal Address**

Northern Trust International Fund Administration Services (Ireland) Limited  
2nd Floor, Block A, City East Plaza, Towleron, Ballysimon, Limerick, V94 X2N9, Ireland

**Registered Address**

Northern Trust International Fund Administration Services (Ireland) Limited  
George's Court, 54-62 Townsend Street, Dublin 2, D02 R156, Ireland

**Telephone:** +353 1 434 5122

**Facsimile:** +353 1 553 9409

**Email:** [Sandscapital\\_ta@ntrs.com](mailto:Sandscapital_ta@ntrs.com) (queries only)

**Key Investor Information Document (KIID)**

Please ensure that you have read the Prospectus and the relevant Key Investor Information Document(s) (the "KIID") before completing this Account Opening Form. The KIID is (are) available at the Investment Manager's website [www.sandscapital.com](http://www.sandscapital.com) under the section headed *Strategies* – applicants should select the relevant Strategy tab (Global Growth, US Select Growth, Emerging Markets Growth or Global Leaders) followed by the Fund/UCITS Investors tab to access the KIID.

**Data Protection**

Your personal information will be handled by the Administrator or its duly appointed delegates as Data Processor for the Fund in accordance with the Irish Data Protection Acts 1988 to 2018 and the General Data Protection Regulation (Regulation 2016/679) (together the "Data Protection Legislation"). Your information provided herein will be processed for the purposes of complying with the Data Protection Legislation and this may include disclosure to the Irish Revenue Commissioners. Please see further details at Appendix 5 of this Account Opening Form.

**Complaints**

Any complaints concerning the Fund may be sent to Sands Capital Funds plc, c/o Northern Trust International Fund Administration Services (Ireland) Limited 2nd Floor, Block A, City East Plaza, Towleron, Ballysimon, Limerick, V94 X2N9, Ireland. Shareholders are entitled to make complaints free of charge and all information surrounding the Fund's complaints procedure will be made available to Shareholders on request, free of charge.

**Section 1: Registration Details (this section must be completed)**

**A) Individual/Joint Shareholders - (Mandatory fields are marked with an \*)**

Shareholder 1	Shareholder 2
First Name* <input type="text"/>	First Name <input type="text"/>
Family Name* <input type="text"/>	Family Name <input type="text"/>
Date of Birth* <input type="text"/>	Date of Birth <input type="text"/>
Registered Address - Street 1* <input type="text"/>	Registered Address - Street 1 <input type="text"/>
Street 2* <input type="text"/>	Street 2 <input type="text"/>
Town/Country/Postcode* <input type="text"/>	Town/Country/Postcode <input type="text"/>
Contact Telephone Number * <input type="text"/>	Contact Telephone Number <input type="text"/>
Contact Email Address* <input type="text"/>	Contact Email Address <input type="text"/>
Occupation/Business Activity* <input type="text"/>	Occupation/Business Activity <input type="text"/>
Shareholder 3	Shareholder 4
First Name <input type="text"/>	First Name <input type="text"/>
Family Name <input type="text"/>	Family Name <input type="text"/>
Date of Birth <input type="text"/>	Date of Birth <input type="text"/>
Registered Address - Street 1 <input type="text"/>	Registered Address - Street 1 <input type="text"/>
Street 2 <input type="text"/>	Street 2 <input type="text"/>
Town/Country/Postcode <input type="text"/>	Town/Country/Postcode <input type="text"/>

Contact Telephone Number

Contact Telephone Number

Occupation/Business Activity

Occupation/Business Activity

**Mailing address (if different from the address of the first named holder)**

**B) Institutional / Corporate Investors**

**Registered Account Name\*** *(including Designation where applicable):*

Registered Address - Street 1\*

Street 2\*

Town/Country/Postcode\*

Contact Telephone Number\*

Country of Incorporation\*

Occupation/Business Activity\*

Mailing address (if different from the registered address)

Existing/ Related Account Number (If applicable):

*Please note that an account cannot be registered in the name of a Trust. In the case of a Trust the registered account holder(s) must be the Trustee(s) as trustee for the Trust with the name of the Trust added under the Designation.*

**Section 2: Contact Details (if applicable)**

Email correspondence, where provided, will be the preferred method of communication. If no email is provided, correspondence will then be issued via post or fax. SWIFT communication will be issued where possible. Please note that an email address is compulsory for the welcome email which will contain the account number confirmation required to place transactions.

EMAIL, FAX OR SWIFT CODE (Please ensure the appropriate document is selected to ensure receipt otherwise all options will be selected)	Welcome Email	Contract Note	Statements	SWIFT

**Section 3: Bank Details (this section must be completed)**

**Important information regarding bank accounts for subscriptions and redemptions**

Third party payments are not permitted for redemptions. Please confirm the details of the bank accounts from which and to which payments will be made below.

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

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

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

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



BANK ACCOUNT DETAILS FROM WHICH SUBSCRIPTIONS WILL BE PAID  
 BANK ACCOUNT DETAILS FOR SETTLEMENT OF REDEMPTIONS

**BENEFICIARY BANK INFORMATION**

Name of Bank		
A/c Name		
Address of Bank		
A/c Number		
Sort Code		
IBAN		
Swift Code / ABA		Reference Code:

**CORRESPONDENT BANK INFORMATION**

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

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

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

NOTES: Please ensure that you have read the Prospectus before completing this Account Opening Form. Defined terms used in this Account Opening Form and Subscription Instruction are those used in the Prospectus (unless otherwise defined or unless the context otherwise requires).

## Section 4: Investor AML Due Diligence Information (section must be completed by all applicants)

Anti-Money Laundering (AML) due diligence requirements in accordance with The Criminal Justice (Money Laundering and Terrorist Financing) Acts 2010 – 2018.

➤ Guide to completing due diligence.

**Part I** – To be completed by all applicants.

**Part II** – To be completed by all applicants.

**Appendix 6** – All applicants to provide AML due diligence documentation outlined in Appendix 6 (as per investor type) in order to establish the identity of an investor and verify same to the extent warranted by risk. **AML documents must be provided in advance before an account can be opened.**

### Due Diligence Information - Purpose of the Investment

#### Part I

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

A. What is the expected annual subscription to the Fund

\_\_\_\_\_

How frequent do you expect to trade in the Fund (please tick): Once-Off Subscription

Once a: Month  Quarter  Year

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

\_\_\_\_\_

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

Natural Persons only:

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

Source of Funds (activity that generated transaction funding): \_\_\_\_\_

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

## Due Diligence Documentation - Investor Type

### Part II

Please tick investor type below (please note, investor type indicates the documents/ confirmations required to open account as per Appendix 6):

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

Occupation/Business Activity: \_\_\_\_\_

If you, or any beneficial owners, are a Politically Exposed Person. Yes  No

*A Politically Exposed Person ('PEP') means an individual (or family member or close associate of such individual) who is, or has, at any time in the preceding 12 months, been entrusted with a prominent public function (e.g. this can include but not limited to: head of state/ government, government / deputy minister, member of parliament, senior official of a political party or member of the supreme court).*

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

## Due Diligence Documentation - Leverage Across Investments

I hereby authorize the Administrator to leverage the due diligence documentation provided for the purposes of compliance with applicable regulatory requirements across all investments which I currently hold/ may hold in the future across all funds which are administered by the Administrator.

Yes  No

## Due Diligence Documentation - Ultimate Beneficial Owner

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

### Corporate Entities

Ultimate Beneficial Owners are individuals who directly or indirectly hold ownership of 25% or more of the shares or voting rights in an entity, or control of the entity.

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

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

Name	Address	% Ownership or control	Nationality	Date of Birth

For Trusts or similar arrangements, where the beneficiaries are not yet been determined, the class of persons in whose main interest the trust or similar legal arrangement has been set up should be stated (please provide an additional document/ information as required):

Note: If there is/ are no Individual(s) with a beneficial interest of 25% or more (either directly or indirectly) of the shares or voting rights of the entity, or anyone that otherwise exercises control of the entity (where applicable), please check the box.

**Related Person Detail**

Full names of all Related Persons:

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

Please complete the below:

Name	Address	Nationality	Date of Birth

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

Signature 1 \_\_\_\_\_ Print Name \_\_\_\_\_ Date \_\_\_\_\_

Signature 2 \_\_\_\_\_ Print Name \_\_\_\_\_ Date \_\_\_\_\_

## Section 5: Agent Information (if applicable)

Agent Name

Agent Address

Contact Name

Contact Telephone Number

Contact Fax Number

VAT Registration Number

Regulator

Regulator Approval Number

Agents Stamp

Agency Number

Commission Terms agreed with the Fund Promoter

## Section 6: Investor Tax Residency (this section must be completed)

PLEASE TICK (✓) THE RELEVANT BOX

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

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

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

An investor may be a “U.S. Taxpayer” but not a “U.S. Person,” as those terms defined under the Internal Revenue Code of 1986, as amended, (the “Code”). For example, an individual who is a U.S. citizen residing outside of the United States is not a “U.S. Person” but is a “U.S. Taxpayer” as those terms are defined under the Code.

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

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

### Investment Undertaking Tax

Every applicant applying for shares on the applicant’s own behalf is hereby obliged to notify the Fund or an agent of the Fund appointed for this purpose, as the case may be, in writing if the applicant is or becomes resident or ordinarily resident in Ireland. An individual is ordinarily resident in Ireland if the individual has been resident in Ireland for each of the 3 preceding years of assessment (i.e. calendar years) and that individual continues to be ordinarily resident in Ireland until the individual has not been resident in Ireland in each of the 3 preceding years of assessment.

Every applicant applying for shares on behalf of another person is hereby obliged to notify in writing the Fund or an agent of the Fund appointed for this purpose, as the case may be, if the applicant is, or becomes, aware that any person who is beneficially entitled to any of those shares may be resident or ordinarily resident in Ireland or may have become resident in Ireland. An individual is ordinarily resident in Ireland if the individual has been resident in Ireland for each of the 3 preceding years of assessment (i.e. calendar years) and that individual continues to be ordinarily resident in Ireland until the individual has not been resident in Ireland in each of the 3 preceding years of assessment.

## Section 7: FATCA & CRS (this section must be completed by all applicants)

### Entity Self-Certification for FATCA and CRS

#### Instructions for completion and Data Protection notice.

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

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

For further information on FATCA or CRS please refer to the Irish Revenue or the OECD website at:

<http://www.revenue.ie/en/business/aeoi/index.html>

<http://www.oecd.org/tax/automatic-exchange/> in the case of CRS only.

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

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

(Mandatory fields are marked with an \*)

#### \*Section 1: Account Holder Identification

\*Account holder Name: \_\_\_\_\_ (the "Entity")

Country of Incorporation or Organisation:

\_\_\_\_\_

\*Current (Resident or Registered) Address:

Number \_\_\_\_\_ Street: \_\_\_\_\_

City, town, State, Province or County: \_\_\_\_\_

Postal/ZIPCode: \_\_\_\_\_

Country: \_\_\_\_\_

Mailing address (if different from above):

Number: \_\_\_\_\_ Street: \_\_\_\_\_

City, Town, State, Province or County: \_\_\_\_\_

Postal/ZIPCode: \_\_\_\_\_ Country: \_\_\_\_\_

**\*Section 2: FATCA Declaration:**

Please tick either (a), (b) or (c) below and complete as appropriate.

a) The Entity is a **Specified U.S. Person** and the Entity's U.S. Federal Taxpayer Identifying number (U.S. TIN) is as follows:

U.S. TIN: \_\_\_\_\_

Or

b) The Entity is **not a Specified U.S. Person** (Please also complete Sections 3, 4 and 5)

Or

c) The Entity is a **US person but not a Specified U.S. Person** (Please also complete Sections 4 and 5)

Indicate exemption: \_\_\_\_\_

**\*Section 3: Entity's FATCA Classification** (the information provided in this section is for FATCA, please note your FATCA classification may differ from your CRS classification in Section 5):

**3.1 Financial Institutions under FATCA:**

If the Entity is a *Financial Institution*, please tick one of the below categories and provide the Entity's GIIN at 3.2 or indicate at 3.3 the reason why you are unable to provide a GIIN.

I.	<i>Irish Financial Institution or a Partner Jurisdiction Financial Institution</i>	<input type="checkbox"/>
II.	<i>Registered Deemed Compliant Foreign Financial Institution</i>	<input type="checkbox"/>
III.	<i>Participating Foreign Financial Institution</i>	<input type="checkbox"/>

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

□□□□□□.□□□□□□.□□.□□□□

**3.3 If the Entity is a Financial Institution but unable to provide a GIIN, please tick one of the below reasons:**

I.	<p>The Entity has not yet obtained a <i>GIIN</i> but is sponsored by another entity which does have a <i>GIIN</i>. Please provide the sponsor's name and sponsor's <i>GIIN</i>:</p> <p><b>Sponsor's Name:</b> _____</p> <p><b>Sponsor's GIIN:</b> □□□□□□.□□□□□□.□□.□□□□</p> <p><b>NOTE:</b> this option is only available to Sponsored Investment Entities in Model 1 IGA jurisdictions. Sponsored Investment Entities that do not have U.S. reportable accounts are not required to register and obtain a GIIN with the IRS unless and until U.S. reportable accounts are identified.</p>	<input type="checkbox"/>
II.	<p><b>The Entity is an Exempt Beneficial Owner,</b></p> <p>Please tick and confirm the category of Exempt Beneficial Owner;</p>	<input type="checkbox"/>



	<ul style="list-style-type: none"> <li>➤ <input type="checkbox"/> Government Entity</li> <li>➤ <input type="checkbox"/> International Organisation</li> <li>➤ <input type="checkbox"/> Foreign Central Bank</li> <li>➤ <input type="checkbox"/> Exempt Retirement Fund</li> <li>➤ <input type="checkbox"/> Collective Investment Vehicle Wholly Owned by Exempt Beneficial Owners.</li> </ul>	
III.	<b>The Entity is a Certified Deemed Compliant Foreign Financial Institution (including a deemed compliant Financial Institution under Annex II of the IGA Agreement)</b>  Indicate exemption: _____	<input type="checkbox"/>
IV.	<b>The Entity is a Non-Participating Foreign Financial Institution</b>	<input type="checkbox"/>
V.	<b>The Entity is an Excepted Foreign Financial Institution</b> Indicate exemption: _____	<input type="checkbox"/>
VI.	<b>The Entity is a Trustee Documented Trust.</b>  Please provide your Trustee's name and GIIN Trustee's Name: _____  Trustee's GIIN: <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="checkbox"/>

### 3.4. Non-Financial Institutions (Non-Financial Foreign Entity/NFFE) under FATCA:

If the Entity is **not a Financial Institution**, please confirm the Entity's FATCA classification below by ticking one of the below categories

I.	<b>Active (NFFE)</b>	<input type="checkbox"/>
	<b>Passive (NFFE)</b> (Please tick the box that applies)	
II.	<b>I. Passive (NFFE) with no Controlling Persons that are specified U.S Persons.</b>	<input type="checkbox"/>
	<b>II. Passive (NFFE) with Controlling Persons that are specified U.S Persons. (If this box is ticked, please also complete section 6.1 for each of the Controlling Person(s) of the Entity and complete an "Individual (Including Controlling Person(s) Self-certification for FATCA and CRS" form for each Controlling Person(s) as outlined in section 6.2.</b>	<input type="checkbox"/>
III.	<b>Excepted (NFFE)</b>	<input type="checkbox"/>
IV.	<b>Direct Reporting (NFFE)</b> Please provide your GIIN <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/> <input type="text"/>	<input type="checkbox"/>

### \*Section 4: Common Reporting Standard ("CRS") Declaration of Tax Residency

(Note that Entities may have more than one country of Tax Residence)

Please indicate the Entity's country of tax residence for CRS purposes, (if resident in more than one country please detail all countries of tax residence and associated tax identification numbers ("TIN")). Please refer to the OECD CRS Web Portal for AEOI for more information on Tax Residence and TIN's. <http://www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/tax-identification-numbers/#d.en.347759>

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

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

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

Country of Tax Residency	Tax ID Number	If TIN unavailable Select (A, B or C) and check box below

If a TIN is unavailable, please provide the appropriate reason A, B or C where indicated below:

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

**Reason B** - The Account Holder is otherwise unable to obtain a TIN (*Please explain why you are unable to obtain a TIN if you selected Reason B*)

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

**\*Section 5: Entity's CRS Classification**

(The information provided in this section is for CRS. Please note an Entity's CRS classification may differ from its FATCA classification in Section 3 above).

In addition please note that the information that the Entity has to provide may differ depending on whether they are resident in a participating or non-participating CRS Jurisdiction. For more information please see the OECD CRS Standard and associated commentary.

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

**5.1 Financial Institutions under CRS:**

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

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

<http://www.revenue.ie/en/business/aeoi/participating-jurisdictions.pdf>

1.	<b>A Reporting Financial Institution resident in a participating CRS jurisdiction</b>	<input type="checkbox"/>
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II.	<p><b>A Financial Institution Resident in a Non-Participating Jurisdiction</b> (Please also tick the box that applies)</p> <p><input type="checkbox"/> <b>An Investment Entity resident in a Non-Participating Jurisdiction and managed by another Financial Institution</b> (If this box is ticked, please indicate the name of any Controlling Person(s) of the Entity in section 6 below and complete a separate individual self-certification forms for each of your Controlling Persons“)</p> <p><input type="checkbox"/> <b>An Investment Entity resident in a Non-Participating Jurisdiction that is not managed by another Financial Institution</b></p> <p><input type="checkbox"/> <b>Other Financial Institution</b>, including a Depository Financial Institution, Custodial Institution or Specified Insurance Company</p>	<input type="checkbox"/>
III.	<p><b>Non-Reporting Financial Institution under CRS.</b></p> <p><b>Specify the type of Non-Reporting Financial Institution below:</b></p> <p><input type="checkbox"/> Governmental Entity</p> <p><input type="checkbox"/> International Organization</p> <p><input type="checkbox"/> Central Bank</p> <p><input type="checkbox"/> Broad Participation Retirement Fund</p> <p><input type="checkbox"/> Narrow Participation Retirement Fund</p> <p><input type="checkbox"/> Pension Fund of a Governmental Entity, International Organization, or Central Bank</p> <p><input type="checkbox"/> Exempt Collective Investment Vehicle</p> <p><input type="checkbox"/> Trust whose trustee reports all required information with respect to all CRS Reportable Accounts</p> <p><input type="checkbox"/> Qualified Credit Card Issuer</p> <p><input type="checkbox"/> Other Entity defined under the domestic law as low risk of being used to evade tax. Specify the type provided in the domestic law: _____</p>	<input type="checkbox"/>

**5.2 Non Financial Institution (“NFE”) under CRS:**

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

I.	<p><b>Active NFE</b> – a corporation the stock of which is regularly traded on an established securities market. Please provide the name if the established securities market on which the corporation is regularly traded: _____</p>	<input type="checkbox"/>
II.	<p><b>Active NFE</b> – if you are a Related Entity of a regularly traded corporation. Please provide the name of the regularly traded corporation that the Entity is a Related Entity of: _____</p> <p>Please provide details of the securities market that the entity is listed on : _____</p>	<input type="checkbox"/>
III.	<p><b>Active NFE</b> – a Government Entity or Central Bank</p>	<input type="checkbox"/>
IV.	<p><b>Active NFE</b> – an International Organisation</p>	<input type="checkbox"/>
V.	<p><b>Active NFE – other</b> than those listed in I, II, III or IV above. (for example a start-up NFE or a non-profit NFE)</p>	<input type="checkbox"/>
VI.	<p><b>Passive NFE</b> - (if this box is ticked, please also complete Section 6.1 below and indicate the name of all natural Controlling Person(s) of the Entity and complete a separate Individual Self-Certification Form for each of your Controlling Person(s)</p>	<input type="checkbox"/>

**Section 6: Controlling Persons**

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

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

*For further information on Identification requirements under CRS for Controlling Persons, see the Commentary to Section VIII of the CRS Standard.*

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

**6.1 Controlling Person(s) of the Account Holder:**

If you have ticked a Passive NFE with Controlling Persons in **either the FATCA or CRS Classification sections above**, then please also complete this section for each of the Controlling Person(s) of the account holder and provide a separate “Individual (including Controlling Persons) FATCA and CRS Self-Certification” form for each Controlling person as per 6.2 below:

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

I.	
II.	
III.	

**Note: In case of a trust**, Controlling Persons means the settlor(s), the trustee(s), the protector(s) (if any), the beneficiary (ies) or class(es) of beneficiary(ies), AND any other natural person(s) exercising ultimate effective control over the trust. With respect to an Entity that is a legal person, if there are no natural person(s) who exercise control over the Entity, then the Controlling Person will be the natural person who holds the position of senior managing official of the Entity.

**6.2 Complete a separate Individual (Controlling Person’s) Self-Certification for FATCA and CRS for each Controlling Person listed in Section 6.1.**

**\*Section 7: Declarations and Undertakings**

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

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

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

**\*Authorised Signature(s):**

\_\_\_\_\_  
**\*Print Name(s):**

\_\_\_\_\_  
**\*Capacity in which declaration is made:**

\_\_\_\_\_

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

\*Date: (dd/mm/yyyy): \_\_\_\_\_

<b>Individual (including Controlling Persons) Self-Certification for FATCA and CRS</b>
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**Instructions for completion and Data Protection Notice**

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

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

For further information on FATCA or CRS please refer to the Irish Revenue or OECD websites at:

<http://www.revenue.ie/en/business/aeoi/index.html>

<http://www.oecd.org/tax/automatic-exchange/> in the case of CRS only.

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

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

**Section 1, 2, 3 and 5 must be completed by all Account holders or Controlling Persons.**

**Section 4 should only be completed by any individual who is a Controlling Person of an entity account holder which is a Passive Non-Financial Entity, or a Controlling Person of an Investment Entity located in a Non-Participating Jurisdiction and managed by another Financial Institution.**

**(Mandatory fields are marked with an \*)**

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**\*Section 1: Account Holder/Controlling Person Identification**

**\*Account Holder / Controlling Person Name:** \_\_\_\_\_

**\*Current Residential Address:**

Number: \_\_\_\_\_ Street: \_\_\_\_\_

City, Town, State, Province or County: \_\_\_\_\_

Postal/ZIP Code: \_\_\_\_\_ Country: \_\_\_\_\_

**Mailing address (if different from above):**

Number: \_\_\_\_\_ Street: \_\_\_\_\_

City, Town, State, Province or County: \_\_\_\_\_

Postal/ZIP Code: \_\_\_\_\_ Country: \_\_\_\_\_

**\*Place and Date Of Birth**

\*Town or City of Birth: \_\_\_\_\_ \*Country of Birth: \_\_\_\_\_

\*Date of Birth: \_\_\_\_\_

**\*Section 2: FATCA Declaration of U.S. Citizenship or U.S. Residence for Tax purposes:**

Please tick either (a) or (b) and complete as appropriate.

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

\_\_\_\_\_

**OR**

(b)  I confirm that **I am not** a U.S. citizen or resident in the U.S. for tax purposes.

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**\*Section 3: Common Reporting Standard (CRS) Declaration of Tax Residency/Residencies (please confirm all Tax Residencies)**

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

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

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

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

Country of Tax Residency	Tax ID Number	If TIN unavailable Select (A, B or C) and check box below

**If a TIN is unavailable**, please tick the appropriate box as follows;

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

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

**Reason C** - The Account Holder is otherwise unable to obtain a TIN (*Please explain why you are unable to obtain a TIN if you selected Reason C*)

---

**Section 4 – Type of Controlling Person**

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

For Joint or multiple Controlling Person(s) please complete a separate “*Individual (Including Controlling Persons) Self-Certification for FATCA and CRS*” form for each Controlling Person.

Please Confirm the type of Controlling Person applicable under CRS that applies to you/the Account holder by ticking the appropriate box	Please Tick	Entity Name
Controlling Person of a legal person – control by ownership		
Controlling Person of a legal person – control by other means		
Controlling Person of a legal person – senior managing official		
Controlling Person of a trust – settlor		
Controlling Person of a trust – trustee		
Controlling Person of a trust – protector		
Controlling Person of a trust – beneficiary		
Controlling Person of a trust – other		
Controlling Person of a legal arrangement (non-trust) – settlor-equivalent		
Controlling Person of a legal arrangement (non-trust) – trustee-equivalent		
Controlling Person of a legal arrangement (non-trust) – protector-equivalent		
Controlling Person of a legal arrangement (non-trust) – beneficiary equivalent		
Controlling Person of a legal arrangement (non-trust) – other-equivalent		

**\*Section 5: Declaration and Undertakings:**

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

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

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

**Data Protection - Customer Information Notice:**

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

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

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

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

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

**\*Authorised Signature:** \_\_\_\_\_

**\*Print Name:** \_\_\_\_\_

**\*Date: (dd/mm/yyyy):** \_\_\_\_\_

**\*Capacity (if Controlling Person):** \_\_\_\_\_



## Section 8: Representations and Warranties (this section must be completed by all applicants)

- I/We confirm that I am/we are 18 years of age or over.
- I/We hereby acknowledge that I/we have received and read the current Prospectus and that this application is based solely on the Prospectus together (where applicable) with the most recent annual audited report and accounts of the Fund and (if issued after such report and accounts) its most recent unaudited semi-annual report and is made pursuant to the terms of this Account Opening Form.
- I/We acknowledge that I/we have received the latest available Key Investor Information Document(s) ("KIID") in respect of the Share class(es) in which we are investing and hereby acknowledge and confirm that I/we received such KIID free of charge and in good time prior to making this subscription application.
- I/We acknowledge and confirm, in respect of each KIID received, that I/we specifically consented to receive each such KIID in the medium in which I/we in fact received it and that I/we was/were at the time of such receipt presented with the option of receiving the KIID in paper form free of charge.

Please choose from the options below by ticking the relevant box:

- (i) I/We hereby specifically choose and consent to receive the latest available KIID relevant to any future subscription I/we make for shares of any Share class of any Sub-Fund in electronic form by accessing the latest version of such KIID online at the following website address: [www.sandscapital.com](http://www.sandscapital.com), UNDER THE SECTION LABELED STRATEGIES, AND CHOOSING THE RELEVANT STRATEGY TAB, FUND/UCITS INVESTORS (or such other website address as may be notified to me/us from time to time via e-mail to my/our email address as set out by me/us below).

Yes

or

- (ii) I/We specifically undertake and agree to ensure that I/we receive the latest available KIID relevant to any future subscription I/we\* make for shares of any Share class of any Sub-Fund in good time prior to making such subscription by requesting a paper copy of same in writing from the Administrator (whose address is set out above).

Yes

Either option (i) or option (ii) above must be selected. In default of selecting either option, you will be deemed to have selected option (i) in circumstances where you have provided an email address or, where you have not provided an email address, you will be deemed to have selected option (ii).

Please insert below an email address for receiving notice of any change to the website address at which the latest available versions of the Fund's KIIDs will be made available:

Email: \_\_\_\_\_

- Where I am/we are investing as nominee, I/we shall provide my/our client(s) with the KIID issued in respect of the Sub-Fund and/or Share Class (as the case may be) and I/we shall ensure that we do so in compliance with Commission Regulation (EU) No. 583/2010, as amended from time to time or by any supplemental legislation and in compliance with the applicable legislation in any jurisdiction in carrying out this activity. I/We shall maintain records of my/our provision of the KIID to my/our clients and shall furnish such records to the Fund, or its delegates, upon request.
- Requests for redemption payments to be made by telegraphic transfer will be subject to bank charges. Such charges will normally be payable by the Shareholder although the Fund has the discretion to determine that these charges should be borne by the Fund or the relevant Sub-Fund.

- I/We agree that the issue and allotment to me/us of the Shares is subject to the provisions of the Prospectus, that subscription for Shares will be governed and construed in accordance with Irish law and I/we confirm that by subscribing for Shares, I am/we are not relying on any information or representation other than such as may be contained in the Prospectus, the relevant KIID and the most recent annual or semi-annual report (if available) thereto.
- I/We hereby represent and warrant to the Administrator and the Fund the following:
  - (a) I/We have the full right, power, authority, eligibility and legal capacity to enter into this agreement and purchase Shares and this agreement is enforceable against me/us in accordance with its terms.
  - (b) I am/we are not acquiring Shares for or on behalf of, or for the benefit of, any person or entity who/which is not eligible to invest in the Fund nor do I/we intend transferring any Shares which I/we may purchase to any person or entity who/which is not eligible to invest in the Fund. I/We hereby certify that I am/we are aware of the risk involved in the proposed investment in the Fund and of the fact that inherent in such investment is the potential to lose all of the sum invested.
  - (c) In purchasing Shares, I/we have complied with any applicable guidelines, regulations or limitations on investments established by any federal, state, local or foreign regulatory body and the beneficial owner(s) of the account purchasing Shares is/are not prohibited from receiving new issue allocations under Rule 5130 or 5131 promulgated by the U.S. Financial Industry Regulatory Authority.
  - (d) I/We have received and read the Prospectus and have determined that the Shares are a suitable investment.
- I/We agree to notify the Fund or the Administrator immediately if I/we become aware that any of the representations, declarations or warranties given by me/us in this Account Opening Form is/are no longer accurate and complete in all respects and agree immediately in such event to take such action as the Fund may direct, including where appropriate, to sell or to tender to the Fund for redemption a sufficient number of Shares to allow the representation to be made or all Shares which I/we hold in the Fund. I/We hereby agree to promptly advise the Fund of any other change to the information provided in this Account Opening Form in the future.
- I/We agree to indemnify the Administrator, on its own behalf and as agent of the Fund and agree to keep the Administrator and the Fund indemnified against any loss of any nature whatsoever arising to any of them as a result of any breach of any of the representations, warranties or declarations given by me/us in this Account Opening Form.
- I/We have such knowledge and experience I in business and financial matters or have obtained advice from a professional adviser such that I am/we are capable of evaluating the merits, and the risks, of an investment by me/us in the Fund.
- I/We understand that the tax disclosures set forth in the Prospectus are of a general nature and may not cover the jurisdiction in which I am/we are subject to taxation and that the tax consequences of my/our purchase of Shares depend on my/our individual circumstances.
- I/We acknowledge the right of the Fund at any time to require the mandatory redemption of Shares in the circumstances provided for in the Prospectus.
- I/We hereby certify that the Shares are not being acquired for the benefit of, directly or indirectly, any U.S. Person as defined under Regulation S of the United States Securities Act of 1933, as amended (the "Securities Act") nor in violation of any applicable law, and that I/we will not, subject to the conditions set forth in the Prospectus, sell or offer to sell or transfer Shares in the United States or to or for the benefit of a U.S. Person.

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

U.S. Person. Each of the following is a “U.S. person” under Regulation S (as modified by related guidance): (a) any natural person resident in the United States; (b) any natural person who is only temporarily residing outside the United States; (c) any partnership or corporation organized or incorporated under the laws of the United States; (d) any estate of which any executor or administrator is a U.S. person; (e) any trust of which any trustee is a U.S. person; (f) any agency or branch of a non-U.S. entity located in the United States; (g) any non-discretionary account or similar account (other than an estate or trust) held by a dealer or other fiduciary for the benefit or account of a U.S. person; (h) any discretionary account or similar account (other than an estate or trust) held by a dealer or other fiduciary organized, incorporated, or (if an individual) resident in the United States; (i) any account of a U.S. person over which a non-U.S. fiduciary has investment discretion or any entity, which, in either case, is being used to circumvent the registration requirements of the 1940 Act; (j) any employee benefit or pension plan that does not have as its participants or beneficiaries persons substantially all of whom are not U.S. persons; and (k) any partnership or corporation if (i) organized or incorporated under the laws of any non-U.S. jurisdiction and (ii) formed by a U.S. person principally for the purpose of investing in securities not registered under the Securities Act, unless it is organized or incorporated, and owned, by accredited investors (as defined in Rule 501(a) under the Securities Act) who are not natural persons, estates or trusts. Terms used in this Section have the meanings given to them in Regulation S under the Securities Act.

Notwithstanding the above, “U.S. person” under Regulation S and related guidance does not include: (a) any discretionary account or similar account (other than an estate or trust) held for the benefit or account of a non-U.S. person by a dealer or other professional fiduciary organized, incorporated or, if an individual, resident in the United States; (b) any estate of which any professional fiduciary acting as executor or administrator is a U.S. person if (i) an executor or administrator of the estate who is not a U.S. person has sole or shared investment discretion with respect to the assets of the estate and (ii) the estate is governed by non-U.S. law; (c) any trust of which any professional fiduciary acting as trustee is a U.S. person if a trustee who is not a U.S. person has sole or shared investment discretion with respect to the trust assets, and no beneficiary of the trust (and no settlor if the trust is revocable) is a U.S. person; (d) an employee benefit plan established and administered in accordance with the law of a country other than the United States and customary practices and documentation of such country; (e) any agency or branch of a U.S. person located outside the United States if (i) the agency or branch operates for valid business reasons and (ii) the agency or branch is engaged in the business of insurance or banking and is subject to substantive insurance or banking regulation, respectively, in the jurisdiction where located; or (f) the International Monetary Fund, the International Bank for Reconstruction and Development, the Inter- American Development Bank, the Asian Development Bank, the African Development Bank, the United Nations and their agencies, affiliates and pension plans, and any other similar international organizations, their agencies, affiliates and pension plans.

➤ I/We will hold Shares on behalf of a U.S. Taxpayer\* (as defined below):

Yes  No  (please tick the appropriate box)

If the “yes” box is ticked, then I/we understand the U.S. tax consequences of such an investment. I/We agree to provide the Fund with such additional tax information as it may from time to time request.

\*“U.S. Taxpayer” is defined to include a U.S. citizen or resident alien of the United States (as defined for United States federal income tax purposes); any entity treated as a partnership or corporation for U.S. tax purposes that is created or organised in, or under the laws of, the United States or any state thereof (including the District of Columbia); any other partnership that is treated as a U.S. Taxpayer

under U.S. Treasury Department regulations; any estate, the income of which is subject to U.S. income taxation regardless of source; and any trust over whose administration a court within the United States has primary supervision and all substantial decisions of which are under the control of one or more U.S. fiduciaries. Persons who have lost their U.S. citizenship and who live outside the United States may nonetheless, in some circumstances, be treated as U.S. Taxpayers. An investor may be a "U.S. Taxpayer" but not a "U.S. Person," as that term is defined under the Internal Revenue Code of 1986, as amended. For example, an individual who is a U.S. citizen residing outside of the United States is not a "U.S. Person" but is a "U.S. Taxpayer".

- I/We declare that the entity hereby subscribing for Shares is neither a Benefit Plan Investor nor investing on behalf of or with any assets of a Benefit Plan Investor as defined below. (Benefit Plan Investors should contact the Fund.) "Benefit Plan Investor" is used as defined in U.S. Department of Labor ("DOL") Regulation § 2510.3-101(f)(2), and includes (i) any employee benefit plan (as defined in Section 3(3) of the Employee Retirement Income Security Act of 1974, as amended ("ERISA")), whether or not such plan is subject to Title I of ERISA (which includes both U.S. and non-U.S. plans, plans of governmental entities as well as private employers, church plans, and certain assets held in connection with nonqualified deferred compensation plans); (ii) any plan described in Section 4975(e)(1) of the Internal Revenue Code of 1986, as amended, (the "Code") (which includes a trust described in Code Section 401(a) which forms a part of a plan, which trust or plan is exempt from tax under Code Section 501(a), a plan described in Code Section 403(a), an individual retirement account described in Code Section 408 or 408A or an individual retirement annuity described in Code Section 408(b), a medical savings account described in Code Section 220(d) and an education savings account described in Code Section 530); and (iii) any entity whose underlying assets include plan assets by reason of a plan's investment in the entity (generally because 25 per cent. or more of a class of interests in the entity is owned by plans). Benefit Plan Investors also include that portion of any insurance company's general account assets that are considered "plan assets" and (except if the entity is an investment company registered under the 1940 Act) the assets of any insurance company separate account or bank common or collective trust in which plans invest.
- If I am/we are a commodity pool, my/our investment is directed by an entity which (i) is not required to be registered in any capacity with the CFTC or to be a member of the National Futures Association ("NFA"), (ii) is exempt from registration or (iii) is duly registered with the CFTC in an appropriate capacity or capacities and is a member in good standing of the NFA.
- Investment Company Representations:
  - (a)  I am/We are neither an investment company required to be registered under the Investment Company Act of 1940, as amended (the "1940 Act"), nor an issuer that, but for an exception from the definition of "investment company" under the 1940 Act, would be an investment company.
  - (b)  I am/We are an investment company subject to registration or would be an investment company but for an exception under the 1940 Act.

I/We have \_\_\_\_ U.S. Person beneficial owner(s).

*(State the number, not the percentage, of U.S. Person beneficial owners. Investment companies with U.S. Person beneficial owners must contact the Administrator.)*

- I/We, if not a natural person, am/are duly organised, validly existing and in good standing under the laws of the jurisdiction in which I am/we are organised and I/we have the power and authority to enter into and perform my/our obligations under this Account Opening Form.
- I am/we are able to bear the economic risk of an investment in the Shares, including, without limitation, the risk of loss of all or a part of my/our investment. I/we do not have an overall commitment to investments which are not readily marketable that is disproportionate to my/our net worth, and my/our investment in the Shares will not cause such overall commitment to be excessive.

- The Administrator and the Fund are each hereby authorised and instructed to accept and execute any instructions in respect of the Shares to which this application relates given by me/us by facsimile or e-mail. I/We hereby agree to indemnify each of the Administrator and the Fund and agree to keep each of them indemnified against any loss of any nature whatsoever arising to any of them as a result of any of them acting upon my/our facsimile or e-mail instructions or due to a breach by me/us of any of my/our representations or warranties. The Administrator and the Fund may rely conclusively upon and shall incur no liability in respect of any action taken upon any notice, consent, request, instruction or other instrument believed in good faith to be genuine or to be signed by properly authorised persons. It is the Shareholder's responsibility to receive confirmation from the Administrator that they can confirm receipt of the document once it is sent by facsimile or other electronic means of communication.
- I/We hereby acknowledge, confirm and represent that in subscribing for Shares I/we am/are not involved in: (i) concealing or disguising any property which is, or which directly or indirectly represents, the proceeds of a criminal activity; or (ii) converting or transferring any property which is, or which directly or indirectly represents, the proceeds of criminal activity for the purpose of avoiding prosecution for an offence. I/We hereby acknowledge, confirm and represent that I/we do not know or suspect and have no reason to suspect that any of the subscription monies forwarded by me/us for Shares is, or directly or indirectly represents, another person's proceeds of a criminal activity and the Administrator, the Directors and the Fund shall be held harmless and indemnified against any penalty or loss arising as a result of the foregoing representations and undertaking being shown to be untrue or incorrect in any way. I/We acknowledge that due to anti-money laundering requirements operating within Ireland, the Administrator or the Fund (as the case may be) may require further identification of the applicant(s) before the application can be processed and the Administrator, on its own behalf and as agent of the Fund and the Fund shall be held harmless and indemnified against any loss arising as a result of a failure to process the application, or a delay in processing any redemption requests, if such information requested by the Administrator or the Fund has not been provided by me/us or has been provided in incomplete form.
- I/We acknowledge that applications for Shares will not be deemed to be complete until all anti-money laundering procedures have been completed in accordance with the terms of the Prospectus and to the satisfaction of the Administrator/the Fund. I/We acknowledge that redemption proceeds will not be paid until all anti-money laundering procedures have been completed.
- Noting that fractions of Shares will be issued where any part of the subscription monies for Shares represents less than the Subscription Price for one Share (to such number of decimal places as the Directors may from time to time determine), I/we hereby accept such lesser number of Shares, if any, than may be specified above in respect of which this application may be accepted.
- In respect of joint applicants only, we direct that on the death of one of us the Shares for which we hereby apply be held in the name of and to the order of the survivor or survivors of us or the executor or administrator of the last of such survivor or survivors.
- I/We confirm that I/we have read in detail the Data Protection Notice appended to this Account Opening Form as Appendix 5. I/We acknowledge that this document provides an outline of my/our data protection rights and the Fund's data protection obligations as they relate to my/our investment in the Fund.
- I/We shall supply the Fund with executed copies of those documents attached, or referred to, in Annex 1 (for US and Non-US Taxpayers).
- I/We agree to provide to the Fund and the Administrator at such times as each of them may request such declarations, certificates, self-certification forms, withholding statements or documents as each of them may reasonably require (the "Tax Information") in connection with this investment (including for the purposes of tax, FATCA and/or CRS<sup>2</sup> regulations and reporting requirements). Should any

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<sup>2</sup> CRS: (a) the Standard for Automatic Exchange of Financial Account Information for Tax Matters published by the Organisation for Economic Co-operation and Development on 15 July 2014 (the "Standard") (including any commentary thereon); and (b) any treaty, law, regulation or other official guidance of any jurisdiction, or relating to

information furnished to any of them become inaccurate or incomplete in any way, I/we hereby agree to notify the Fund or the Administrator immediately of any such change and further agree to request the redemption of Shares in respect of which such confirmations have become incomplete or inaccurate where requested to do so by the Fund.

- In addition to the Tax Information, I/we agree to promptly provide, and periodically update, at any times requested by the Administrator with any information (or verification thereof) the Administrator deems necessary for the Fund to comply with tax reporting requirements, FATCA and/or CRS (including any imposed by any inter-governmental agreement (IGA) or any legislation, law, regulation or other official guidance in relation to any IGA on the implementation of FATCA or CRS). This may include such information as is required to evidence the Fund's (or any accountholder in the Fund's) status for FATCA or CRS purposes, including (not limited to) whether the Fund is a financial institution, or whether its account holders are US persons for purposes of FATCA, or what the account holder's country of tax residence for purposes of CRS.
- We represent and warrant the completeness and accuracy of any information (as at the date of submission) and authorise the Fund and the Administrator to act upon such information in good faith, including, but not limited to, disclosing or submitting such information to the Irish tax authorities. I/We agree to waive any provision of foreign law that would, absent such a waiver, prevent compliance with such requirements. The Fund shall have no obligation to carry out any investigation with respect to the truth, accuracy or completeness of any information provided by us and I/We will, on demand, hold the Fund harmless from any liability resulting from the my/our failure to provide complete and accurate Information.
- I/We hereby acknowledge that if I/we fail to provide any information on a timely basis, I/we may be subject to 30% U.S. withholding tax on the investor's share of "withholdable payments" (as defined for purposes of FATCA) received by the Fund.
- I/We hereby acknowledge that if I/we fail to provide any information and such failure results in the Fund being unable to comply with FATCA, any IGA or CRS, the Fund may exercise its right to completely redeem an applicant (at any time upon any or no notice). I/We further acknowledge and agree to indemnify the Fund and its other investors for any losses resulting from our failure to meet its obligations under this Section, including any U.S. withholding tax imposed on the Fund.
- I/We hereby acknowledge, for the purposes of the Electronic Commerce Act 2000, that if I have provided an e-mail address or fax number to the Fund or its delegate, I consent to any such notice or document as may be sent to me/us by the Fund or its delegate being sent to me/us by fax or electronically to the fax number or e-mail address previously identified to the Fund or its delegate which I/we acknowledge constitutes effective receipt by me/us of the relevant notice or document. I/we acknowledge that I am/we are not obliged to accept electronic communication and may at any time choose to revoke my/our agreement to receive communications by fax or electronically by notifying the Fund in writing at the above address, provided that my/our agreement to receive communications by fax or electronically shall remain in full force and effect pending receipt by the Fund of written notice of such revocation.
- I/We hereby apply to be entered in the Register of Shareholders as the holder/holders of the Shares issued in relation to this application. I/We hereby acknowledge that this application for Shares may be rejected in whole or in part by the Fund or its delegates without assigning any reason therefor.
- I/We hereby agree to be bound by the Constitution (as may be amended from time to time) and the material contracts referred to in the Prospectus.
- In consideration of the Fund processing this Account Opening Form and making a provisional allotment of Shares I/we hereby agree to indemnify and hold harmless the Fund, the Directors, the Investment Manager, the Administrator and the Depositary against any losses, costs or expenses

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a competent authority agreement (including any commentary thereon and any notification issued pursuant to a multilateral competent authority agreement) or intergovernmental agreement which (in either case) facilitates the implementation of the Standard.

incurred by them as a result of my/our failure to pay the required subscription monies for this application of Shares within the time required by the Directors.

- I/We confirm that I/we have received a copy of Appendix 5 – Data Protection Notice and that I/we have read and fully understand all of the information it contains. To the extent that the information contained in this Account Opening Form, or any other information that I/we provide to the Fund in connection with my/our investment, relates to another identifiable individual on whose behalf I/we am/are applying for Shares, I/we also confirm that I/we have provided the information contained in Appendix 5 – Data Protection Notice to each such individual as required pursuant to Regulation (EU) 2016/679.
- I/We hereby confirm that I/we have the full right, power and authority to make this Application and invest in Shares and (*in the case of corporate applicants*) all necessary corporate action has been taken to authorise this application and such investment.
- I/We acknowledge that measures aimed at the prevention of money laundering may require verification of my/our identity. I/We acknowledge that Shares will not be issued until such time as the Administrator has received and is satisfied with all the information and documentation requested to verify my/our identity.

**For the attention of applicants domiciled or resident in South Africa only:**

I/We hereby acknowledge that:

- Collective Investment Schemes in Securities (CIS) should be considered as medium to long-term investments;
- the value of a CIS may go up as well as down and past performance is not necessarily a guide to future performance;
- CIS can engage in scrip lending and borrowing, however the Fund does not engage in scrip lending;
- a schedule of fees, charges and maximum commissions is available on request from the Fund or its agent;
- there is no guarantee in respect of capital or returns in a portfolio;
- a CIS may be closed to new investors in order for it to be managed more efficiently in accordance with its investment policy;
- CIS prices are calculated on a net asset basis, which is the total value of all the assets in the portfolio including any income accruals and less any permissible deductions (e.g. brokerage, STT, VAT, auditor's fees, bank charges, trustee and custodian fees and the investment management fee) from the portfolio divided by the number of shares in issue;
- forward pricing is used by the Fund; and
- where foreign securities are included in a portfolio there may be potential constraints on liquidity and the repatriation of funds, macroeconomic risks, political risks, foreign exchange risks, tax risks, settlement risks and potential limitations on the availability of market information. The investor acknowledges the inherent risk associated with the selected investments and that there are no guarantees.

**Signature**

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

Date: \_\_\_\_\_

Signed

Signatory Capacity if applicable (i.e.  
Director/manager)

1. \_\_\_\_\_

\_\_\_\_\_

2. \_\_\_\_\_

\_\_\_\_\_

3. \_\_\_\_\_

\_\_\_\_\_

4. \_\_\_\_\_

\_\_\_\_\_

**IMPORTANT**

**RETAIL INVESTORS - IN THE CASE OF ALL JOINT HOLDERS – ALL HOLDERS MUST COMPLETE THIS DECLARATION & PROVIDE A VALID PROOF OF IDENTIFICATION.**

**INSTITUTIONAL INVESTORS - IN THE CASE OF CORPORATE INVESTORS – A VALID SIGNATURE LIST MUST BE PROVIDED AT ACCOUNT OPENING.**



## Section 9: Appendices

### Appendix 1 - Dealing Procedure

All dealing instructions in relation to the Shares in the Fund must be received before the time(s) specified in the Prospectus (as further set out in Appendix 2 below). Dealing Instructions received after such times will generally be deemed to have been received for the next relevant dealing day.

No redemption payment may be made until the original Account Opening Form has been received and the Administrator is satisfied that all necessary anti-money laundering checks have been completed in full.

By ticking the box opposite, I hereby consent to the provision of contract notes, statements and other reports, by secured or encrypted electronic transmission, which may be issued from time to time by the Administrator in respect of my holdings in the Fund.	
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#### Dealing and Holding Minimums

A US Dollar Accumulating Class	Minimum Initial Subscription	\$500,000
	Minimum Holding	\$500,000
	Minimum Subsequent Subscription	\$5,000
	Minimum Redemption	\$5,000
A EURO Accumulating Class	Minimum Initial Subscription	€500,000
	Minimum Holding	€500,000
	Minimum Subsequent Subscription	€5,000
	Minimum Redemption	€5,000
A Sterling Accumulating Class	Minimum Initial Subscription	£500,000
	Minimum Holding	£500,000
	Minimum Subsequent Subscription	£5,000
	Minimum Redemption	£5,000
H US Dollar Accumulating Class	Minimum Initial Subscription	\$500,000
	Minimum Holding	\$500,000
	Minimum Subsequent Subscription	\$5,000
	Minimum Redemption	\$5,000
Z US Dollar Accumulating Class	Minimum Initial Subscription	\$100,000
	Minimum Holding	\$100,000
	Minimum Subsequent Subscription	\$2,500
	Minimum Redemption	\$2,500

#### NOTES:

- Requests for redemption payments to be made by telegraphic transfer will be subject to bank charges. Such charges will normally be payable by the Shareholder although the Fund has the discretion to determine that these charges should be borne by the Fund or the relevant Sub-Fund.
- If subscribing for Shares in more than one Sub-Fund investors must clearly mark the payment reference accounts for each particular Sub-Fund and the sub-account.
- The Base Currency of the Sub-Fund and the designated currency of any Shares will be set out in the Prospectus and is also noted above. Applications for Shares shall be accepted in the Base Currency of the relevant Sub-Fund or the designated currency of the relevant Share Class.

## Appendix 2 - Payment details

Subscription payments net of all bank charges must be made in the currency in which the order was placed and should be paid by electronic wire transfer to the relevant bank account set out below:

	FOR GBP SETTLEMENT (International payments)	FOR EURO SETTLEMENT	FOR USD SETTLEMENT
To:	Barclays Bank	Barclays Bank PLC,	The Northern Trust International Banking Corporation
Address:	1 Churchill Place, London E14 5HP	Frankfurt	
ABA/Sort Code:			FedwireABA: 026001122  CHIPS ABA: 0112
Swift Code:	BARCGB22	BARCDEFF	CNORUS33
Beneficiary Bank	The Northern Trust International Banking Corporation, New Jersey  Swift: (CNORUS33)	The Northern Trust International Banking Corporation, New Jersey  Swift: (CNORUS33)	
A/C Number:	53529495	0210472800	
Beneficiary account name & number:	Sands Capital Global Growth Fund 604629- 20010  Sands Capital Global Leaders Fund - 618462- 22213  Sands Capital US Select Growth Fund - 604652- 20010  Sands Capital Emerging Markets Growth Fund - 604835-20010	Sands Capital Global Growth Fund 604405- 20010  Sands Capital Global Leaders Fund - 618454- 22213  Sands Capital US Select Growth Fund - 604660- 20010  Sands Capital Emerging Markets Growth Fund - 604843-20010	Sands Capital Global Growth Fund 130732- 20010  Sands Capital Global Leaders Fund - 140624- 20010  Sands Capital US Select Growth Fund - 131953- 20010  Sands Capital Emerging Markets Growth Fund - 132258-20010
Reference: Register number and/or order number			

*(please do not include a dash in the beneficiary account number)*

*Note: Currency subscription settlement times on the third Business Day following the relevant Dealing Day (as those terms are defined in the Prospectus) are as follows*

*GBP 16:00 GMT*

*EURO 14:30 GMT*

*USD 16:00 GMT*

*Note: Monies must come from the account of the investor.*

Please specify your Ordering Institution details for subscriptions

Currency \_\_\_\_\_

Correspondent Bank \_\_\_\_\_

Swift/ABA \_\_\_\_\_

Account Number \_\_\_\_\_

**Appendix 3 - Subscription Form**

**(to be completed only upon receipt of account number confirmation)**

**Sands Capital Funds plc (the "Fund")**

Sands Capital Funds plc  
C/o Northern Trust International Fund Administration Services (Ireland) Limited  
2nd Floor, Block A, City East Plaza, Towlerton, Ballysimon, Limerick, V94 X2N9, Ireland  
Phone: +353 1 434 5122  
Fax: +353 1 553 9409  
Email: [Sandscapital\\_ta@ntrs.com](mailto:Sandscapital_ta@ntrs.com) (queries only)

**This Subscription Form constitutes your agreement to subscribe for Shares in the Fund. Please note the Administrator does not require the original of this document to be posted to them.**

**Please complete this form in blue or black ink using BLOCK CAPITALS. A completed and executed copy of this form should be sent by facsimile to the Fund at +353-1-553-9409 or by email to [SandsCapitalTAInstructions@ntrs.com](mailto:SandsCapitalTAInstructions@ntrs.com) in accordance with the PDF dealing instructions contained in the Account Opening Form or by post to the above address.**

REGISTERED INFORMATION

Registered Account Name

Account Number<sup>3</sup>

Your Company Contact

Name:

Phone No:

Fax No:

E-Mail Address:

DEAL INSTRUCTIONS

Amount to be invested

Amount

or Shares

Amount in words

Name of Sub-Fund

Share Class

ORIGINATING ACCOUNT DETAILS

Bank Name

Bank Address

Sort Code

ABA

Account Name

<sup>3</sup> Please note you would have received this by email from the Administrator.

Account Number

Payment Reference

**NOTE: A REQUEST TO CHANGE BANK ACCOUNT DETAILS MUST BE MADE IN WRITING TO THE ADMINSTRATOR AND MUST BE ACCOMPANIED BY A BANK STATEMENT (NO MORE THAN 6 MONTHS OLD) OR BANKER'S REFERENCE.**

**Subscription payment details**

**Subscription payments net of all bank charges must be made in the currency in which the order was placed and should be paid by electronic wire transfer to the relevant bank accounts set out below.**

	<b>FOR GBP SETTLEMENT (International payments)</b>	<b>FOR EURO SETTLEMENT</b>	<b>FOR USD SETTLEMENT</b>
To:	Barclays Bank	Barclays Bank PLC,	The Northern Trust International Banking Corporation
Address:	1 Churchill Place, London E14 5HP	Frankfurt	
ABA/Sort Code:			FedwireABA: 026001122  CHIPS ABA: 0112
Swift Code:	BARCGB22	BARCDEFF	CNORUS33
Beneficiary Bank	The Northern Trust International Banking Corporation, New Jersey  Swift: (CNORUS33)	The Northern Trust International Banking Corporation, New Jersey  Swift: (CNORUS33)	
A/C Number:	53529495	0210472800	
Beneficiary account name & number:	Sands Capital Global Growth Fund 604629- 20010  Sands Capital Global Leaders Fund - 618462- 22213  Sands Capital US Select Growth Fund - 604652- 20010  Sands Capital Emerging Markets Growth Fund - 604835-20010	Sands Capital Global Growth Fund 604405- 20010  Sands Capital Global Leaders Fund - 618454- 22213  Sands Capital US Select Growth Fund - 604660- 20010  Sands Capital Emerging Markets Growth Fund - 604843-20010	Sands Capital Global Growth Fund 130732- 20010  Sands Capital Global Leaders Fund - 140624- 20010  Sands Capital US Select Growth Fund - 131953- 20010  Sands Capital Emerging Markets Growth Fund - 132258-20010
Reference: Register number and/or order number			

*(please do not include a dash in the beneficiary account number)*

**Note:** Currency subscription settlement times on the third Business Day following the relevant Dealing Day (as those terms are defined in the Prospectus) are as follows:

GBP 16:00 GMT  
EURO 14:30 GMT

USD 16:00 GMT

Note: Monies must come from the account of the investor.

Please specify your Ordering Institution details for subscriptions

Currency \_\_\_\_\_ Correspondent Bank \_\_\_\_\_

Swift/ABA \_\_\_\_\_ Account Number \_\_\_\_\_

**PLEASE NOTE:**

- Monies must originate from the account of the investor.
- Failure to complete these details accurately and in accordance with the original signed Account Opening Form and forward monies within the relevant settlement time scale may result in the loss of good value and an interest claim from the Fund.

**Applicant confirmations**

- I/We confirm that I/we have the authority to make this investment.
- I/we hereby subscribe to invest an (additional) amount in the Fund as set forth below upon the terms and conditions described in the Fund's current Prospectus and the Account Opening Form. I/we hereby confirm that all of the representations, warranties and agreements made in my/our initial application for shares of the Fund/any sub-fund thereof apply to this subscription as if they were made on the date hereof, and certify that all of the information set forth in my/our initial application form remains accurate and complete on the date hereof. Where this request is being signed on my/our behalf, I/we represent that the person signing this request is my/our authorised representative.
- I/We hereby agree to indemnify and hold harmless the Administrator, on its own behalf and as agent for the Fund, the Fund and their directors, officers and employees against any loss, liability, cost or expense (including without limitation legal fees, taxes and penalties) which may result directly or indirectly, from any misrepresentation or breach of any warranty, condition, covenant or agreement set forth herein or in any document delivered by me/us to the Fund or the Administrator. Neither the Administrator nor the Fund will be responsible or liable for the authenticity of instructions received from me/us or any authorised person and may rely upon any instruction from any such person representing himself to be a duly authorised person reasonably believed by the Administrator and/or the Fund to be genuine.

**Key Investor Information Document Confirmations**

- I/We acknowledge that I/we have received the latest available Key Investor Information Document(s) ("KIID") in respect of the Share class(es) in which we are investing and hereby acknowledge and confirm that I/we received such KIID free of charge and in good time prior to making this subscription application.
- I/We acknowledge and confirm, in respect of each KIID received, that I/we specifically consented to receive each such KIID in the medium in which I/we in fact received it and that I/we was/were at the time of such receipt presented with the option of receiving the KIID in paper form free of charge.
- Please choose from the options below by ticking the relevant box:

- (i) I/We hereby specifically choose and consent to receive the latest available KIID relevant to any future subscription I/we make for shares of any Share class of any sub-fund of the Fund in electronic form by accessing the latest version of such KIID online at the following website address: [www.sandscapital.com](http://www.sandscapital.com), UNDER THE SECTION LABELED STRATEGIES, AND CHOOSING THE RELEVANT STRATEGY TAB, FUND/UCITS INVESTORS (or such other website address as may be notified to me/us from time to time via e-mail to my/our email address as set out by me/us below). Yes

or

- (ii) I/We specifically undertake and agree to ensure that I/we receive the latest available KIID relevant to any future subscription I/we make for shares of any Share class of any sub-fund of the Fund in good time prior to making such subscription by requesting a paper copy of same in writing from the Administrator (whose address is set out above).

Yes

*Either option (i) or option (ii) above must be selected. In default of selecting either option, you will be deemed to have selected option (i) in circumstances where you have provided an email address or, where you have not provided an email address, you will be deemed to have selected option (ii).*

Please insert below an email address for receiving notice of any change to the website address at which the latest available versions of the Fund's KIIDs will be made available:

Email: \_\_\_\_\_

**For the attention of applicants domiciled or resident in South Africa only:**

I/We hereby acknowledge that:

- Collective Investment Schemes in Securities (CIS) should be considered as medium to long-term investments;
- the value of a CIS may go up as well as down and past performance is not necessarily a guide to future performance;
- CIS can engage in scrip lending and borrowing, however the Fund does not engage in scrip lending;
- a schedule of fees, charges and maximum commissions is available on request from the Fund or its agent;
- there is no guarantee in respect of capital or returns in a portfolio;
- a CIS may be closed to new investors in order for it to be managed more efficiently in accordance with its investment policy;
- CIS prices are calculated on a net asset basis, which is the total value of all the assets in the portfolio including any income accruals and less any permissible deductions (e.g. brokerage, STT, VAT, auditor's fees, bank charges, trustee and custodian fees and the investment management fee) from the portfolio divided by the number of shares in issue;
- forward pricing is used by the Fund; and
- where foreign securities are included in a portfolio there may be potential constraints on liquidity and the repatriation of funds, macroeconomic risks, political risks, foreign exchange risks, tax risks, settlement risks and potential limitations on the availability of market information. The investor acknowledges the inherent risk associated with the selected investments and that there are no guarantees.

Authorised Signatories	Print Name and Title
Signatory 1 <input type="text"/>	<input type="text"/>
Signatory 2 <input type="text"/>	<input type="text"/>
Signatory 3 <input type="text"/>	<input type="text"/>
Signatory 4 <input type="text"/>	<input type="text"/>
Date <input type="text"/>	

## Appendix 4 - Redemption Form

### Sands Capital Funds plc (the "Fund")

Sands Capital Funds plc  
C/o Northern Trust International Fund Administration Services (Ireland) Limited  
2nd Floor, Block A, City East Plaza, Towlerton, Ballysimon, Limerick, V94 X2N9, Ireland  
Phone: +353 1 434 5122  
Fax: +353 1 553 9409  
Email: [Sandscapital\\_ta@ntrs.com](mailto:Sandscapital_ta@ntrs.com) (queries only)

Please note the Administrator does not require the original of this document to be posted to them.

Please complete this form in blue or black ink using BLOCK CAPITALS. A completed and executed copy of this form should be sent by facsimile to the Fund at +353-1-553-9409 or by email to [SandsCapitalTAInstructions@ntrs.com](mailto:SandsCapitalTAInstructions@ntrs.com) in accordance with the PDF dealing instructions contained in the Account Opening Form.

#### REGISTERED INFORMATION

Registered Account Name	<input type="text"/>						
Account Number	<input type="text"/>						
Date of Redemption	<input type="text"/>						
Your Company contact	<table><tr><td>Name:</td><td>Phone No:</td></tr><tr><td></td><td>Fax No:</td></tr><tr><td></td><td>E-mail Address:</td></tr></table>	Name:	Phone No:		Fax No:		E-mail Address:
Name:	Phone No:						
	Fax No:						
	E-mail Address:						

#### DEAL INSTRUCTIONS

Redeem Cash  Redeem Shares  Fully Redeem

Amount to be redeemed Amount  **or** Shares

Amount in words

Name of Sub-Fund

Share Class

*BANK ACCOUNT DETAILS (Note: Where the below bank account instructions differ from those held on file by the Administrator, an original, signed copy of the new instructions together with a copy of a bank statement (no more than 6 months old) or banker's reference must be received by the Administrator in advance of the remittance of redemption proceeds. Redemption monies will be paid to the Shareholder by electronic transfer to an account in the name of the Shareholder only. No third-party payments will be made. Payment of redemption monies will only be processed upon receipt by the Administrator of a complete Account Opening Form and the required anti-money laundering documentation.)*

Bank Name

Bank Address

Sort Code	<input type="text"/>	ABA	<input type="text"/>
Account Name	<input type="text"/>		
Account Number	<input type="text"/>		
IBAN Number	<input type="text"/>		
Reference	<input type="text"/>		
Correspondent Bank & Swift Code <u>F.F.C to:</u>	Name: Swift Code:		
Account Name	<input type="text"/>		
Account Number	<input type="text"/>		

**PLEASE NOTE**

- I/We confirm that I/we have the authority to make this redemption request.
- I/We hereby agree to indemnify and hold harmless the Administrator, on its own behalf and as agent for the Fund, the Fund and their directors, officers and employees against any loss, liability, cost or expense (including without limitation legal fees, taxes and penalties) which may result directly or indirectly, from any misrepresentation or breach of any warranty, condition, covenant or agreement set forth herein or in any document delivered by me/us to the Fund or the Administrator. Neither the Administrator nor the Fund will be responsible or liable for the authenticity of instructions received from me/us or any authorised person and may rely upon any instruction from any such person representing himself to be a duly authorised person reasonably believed by the Administrator and/or the Fund to be genuine.

Authorised Signatories

Print Name

Signatory 1



Signatory 2



Signatory 3



Signatory 4



Date



## Appendix 5 - Data Protection Notice to Investors

### 1. Purpose of Notice

This notice sets out details on how personal information relating to you, as a shareholder in the Fund, or, as applicable, as a director, trustee, partner, committee member, controller, beneficial owner, authorised signatory or relevant employee/officer of a shareholder of the Fund ("**Personal Data**") will be handled by the Fund, as controller of the Personal Data (as specified in Section 3 of this notice below) and on its behalf by its third party service providers and its or their affiliates or delegates. This notice also sets out details of the limited circumstances in which Northern Trust International Fund Administration Service (Ireland) Limited (the "**Administrator**") is a controller of the Personal Data (as specified in section 5 of this notice below).

### 2. Personal Data Processed by the Fund

The Fund processes your Personal Data as provided to it or its relevant service provider(s) on the application form received in respect of your subscription for shares in the Fund, that it collects, generates or observes while administering the account and other Personal Data you provide to us or the Fund's third party service providers acting on the Fund's behalf such as AML/KYC information. This information includes:

#### a. Information provided to the Fund by you or (if different) the applicant:

- *if you are an individual shareholder* this includes your name and residence address (including proofs of name and address), country of birth, contact details (phone number, fax number, location of phone number, email address and mailing address (if different to residence address)), tax residency and tax identification information, bank details, signature, title, passport/driver's licence or similar, shareholder register account number/social security identifier code or similar, date of birth, source of funds, year-end account value, yearly payments and account currency, transaction instruction and detail, bank statement for subscription account and full bank account payment details;
- *if you are an authorised signatory of the shareholder's account with the Fund* this includes your name, position, signature and, where relevant, country of residence;
- *if you are a Director/trustee/partner/committee member/controller or beneficial owner of the shareholder* this includes your name, residential address, date of birth, occupation and Politically Exposed Person status, passport, driver's licence or similar, contact details (phone/fax number and email address), ID number (tax identifier code, social security identifier code or similar); and
- your email address, if provided for the purpose of receiving confirmation of acceptance of trades.

#### b. Information that the Fund collects, generates or observes: this might include information relating to your/an applicant's investment in the Fund, emails, call recordings and website usage data.

#### c. Information that the Fund obtains from third party sources: This might include information obtained for the purpose of the Fund's AML/KYC procedures, information from public websites and information received from your/the applicant's advisers or from intermediaries. Such third parties include Lexis Nexis and World Check.

### 3. Why the Fund Processes your Personal Data

The Fund collects and processes your Personal Data on various legal bases and for numerous different purposes, including those set out below.

Legal Basis	Purpose(s)
<p><b>Legitimate Interests</b> The Fund may process your Personal Data in order to exercise or preserve its legitimate business interest(s).</p>	<ul style="list-style-type: none"> <li>• To assess the initial application for shares and to facilitate the opening of the account with the Fund.</li> <li>• To facilitate the management and administration of holdings and dealing in the Fund including, without limitation, the processing of redemption, conversion, transfer and additional subscription requests and the processing and verification of instructions.</li> <li>• To make relevant disclosures in the course of a merger, acquisition or bankruptcy of the Fund or any Sub-Fund.</li> <li>• To validate and verify information for security purposes, including for the prevention of fraud.</li> <li>• To manage the Fund, including monitoring and resolving complaints.</li> <li>• To send administrative information relevant to the investment in the Fund.</li> <li>• To exercise or defend a legal claim, including in the context of litigation, arbitration and similar proceedings.</li> <li>• In particular, to monitor and record calls and electronic communications for:               <ul style="list-style-type: none"> <li>• processing and verification of instructions;</li> <li>• investigation and fraud prevention purposes;</li> <li>• crime detection, prevention, investigation and prosecution;</li> <li>• to enforce or defend the Fund's legal rights;</li> <li>• to comply with any legal obligation imposed on the Fund; and</li> <li>• where the processing is in the public interest.</li> </ul> </li> </ul>
<p><b>Compliance with Legal Obligation</b> The Fund may process your Personal Data in order to comply with its relevant legal and regulatory obligations.</p>	<ul style="list-style-type: none"> <li>• To ensure compliance with the Fund's business, tax and regulatory obligations, including its FATCA/CRS reporting obligations.</li> <li>• To assist the Fund's auditors in the auditing of the Fund in accordance with its legal obligations.</li> <li>• To investigate, detect, prevent or prosecute crimes in relation to the prevention of fraud, money laundering and/or terrorist financing, including "know your customer" and other necessary onboarding and ongoing investor checks.</li> </ul>

#### 4. Third Party Recipients of your Personal Data

The Fund may disclose your Personal Data to its relevant service providers and/or other third parties and their affiliates and delegates including:

- the Administrator, Registrar and Transfer Agent, currently Northern Trust International Fund Administration Services (Ireland) Limited;
- the Depositary, currently Northern Trust Fiduciary Services (Ireland) Limited;
- the Auditors, currently PricewaterhouseCoopers;
- its Legal Advisors, including WilliamFry;
- the Secretary, currently Wilton Secretarial Limited;
- Clifton Consulting Limited, t/a KBAAssociates;
- the MLRO, currently Brian Riordan;
- the Investment Manager and Distributor, currently Sands Capital Management, LLC;
- any relevant paying agents, representative agents and sub-distributors;
- the Irish Revenue and other national revenue authorities;
- national regulators, including the Central Bank of Ireland;
- An Garda Síochána;
- banking providers;
- Affiliates of Northern Trust International Fund Administration Service (Ireland) Limited;
- Lexis Nexis; and
- World Check.

The Fund or its service providers may also disclose your Personal Data to any other persons or entities as agreed between the Fund and the relevant service provider, or as may be required or expressly permitted by applicable laws.

#### 5. Why the Administrator, as data controller, Processes your Personal Data

The Administrator has advised that, for the most part, Personal Data is processed by it as a data processor on behalf of the Fund and under the Fund's instruction pursuant to the purposes outlined in 3 above. However, the Administrator wishes to inform you that in certain circumstances the Administrator may use your Personal Data in order to carry out anti-money laundering checks and related actions which the Fund considers appropriate to meet any legal obligations imposed on the Fund relating to, or the processing in the public interest or to pursue the Fund's legitimate interests in relation to, the prevention of fraud, money laundering, terrorist financing, bribery, corruption, tax evasion and to prevent the provision of financial and other services to persons who may be subject to economic or trade sanctions, on an on-going basis, in accordance with the Fund and the Administrator's anti-money laundering procedures. The Administrator, in respect of this specific use of Personal Data, acts as a data controller.

#### 6. International Transfer of your Personal Data

The disclosure of your Personal Data to the third party recipients set out above may involve the transfer of data to the USA, Singapore, South Africa, Switzerland and other jurisdictions outside the European Economic Area ("EEA"), including, in particular, any such jurisdictions in which the Fund may be registered or marketed, which are not the subject of an adequacy decision by the EU Commission. Such countries may not be subject to equivalent data protection laws as countries within the EEA. Any transfer of your Personal Data to jurisdictions outside the EEA may only occur in accordance with the requirements of the EU General Data Protection Regulation (the "GDPR"). For example, in connection with the transfer of your Personal Data to jurisdictions outside the EEA, the Fund has authorised the Administrator as its delegate to enter into standard contractual clauses, as prescribed under the GDPR, with relevant parties to whom your Personal Data will be transferred. Copies of these clauses may be sought from the Client Service Team at Sands Capital Management, LLC at [clientserviceteam@sandscap.com](mailto:clientserviceteam@sandscap.com).

#### 7. Retention of your Personal Data

The Fund and the Administrator will retain Personal Data for as long as necessary or permitted in light of the purpose(s) for which it was obtained. The criteria used to determine the retention periods include:

- the length of the Fund's relationship with you/its client;
- whether there is a legal obligation to which the Fund or Administrator are subject (such as retaining Personal Data obtained for the performance of AML and related checks, which will be kept for **5 years** after termination of the relationship); and
- whether retention is advisable in light of the Fund or Administrator's legal position (such as with respect to statutes of limitations, litigation or regulatory investigations), in which case the Personal Data may be kept for up to **7 years**.

#### 8. Your Data Protection Rights

You have a number of rights in relation to your Personal Data, which are set out in the table below. **In particular these rights include the right to object to processing of your Personal Data where that processing is carried out for the Fund's legitimate interests.** Note that in certain circumstances these rights might not be absolute.

Right	Further Information
<b>Right of Access</b>	You have the right to request a copy of the Personal Data held by the Fund about you and to access the information which the Fund holds about you. The Fund may charge you for making such an access request where it feels your request is unjustified or excessive.
<b>Right to Object</b>	You have a right to object at any time to the processing of your Personal Data where the Fund processes your Personal Data on the legal basis of pursuing the Fund's legitimate interests.
<b>Right to Rectification</b>	You have the right to have any inaccurate Personal Data which the Fund holds about you updated or corrected.
<b>Right to Erasure</b>	In certain circumstances, you may also have your personal information deleted, for example if you exercise your right to object (see above) and the Fund does not have an overriding reason to process your Personal Data or if the Fund no longer requires your Personal Data for the purposes as set out in this notice.
<b>Right to Restriction of Processing</b>	You have the right to ask the Fund to restrict processing your Personal Data in certain cases, including if you believe that the Personal Data the Fund holds about you is inaccurate or the Fund's use of your information is unlawful. If you validly exercise this right, the Fund will store your Personal Data and will not carry out any other processing until the issue is resolved.
<b>Right to Data Portability</b>	You may request the Fund to provide you with your Personal Data which you have given the Fund in a structured, commonly used and machine-readable format and you may request the Fund to transmit your Personal Data directly to another data controller where this is technically feasible. This right only arises where: (1) the Fund processes your Personal Data with your consent or where it is necessary to perform the Fund's contract with you; <b>and</b> (2) the processing is carried out by automated means.

Should you consider that the processing of your Personal Data by the Fund or its service providers infringes the provisions of the GDPR, you may lodge a complaint with a supervisory authority in the EU Member State of your habitual residence, place of work, or in the place of an alleged infringement.

**9. Contact Us**

If you have any questions in relation to the Fund's use of your Personal Data, or would like to submit a request with respect to your rights above, please contact the Client Service Team at Sands Capital Management, LLC at [clientserviceteam@sandscap.com](mailto:clientserviceteam@sandscap.com).

**Appendix 6 – Investor AML Due Diligence Documentation Requirements (all investors- provision in advance)**

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

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

**Examples of Photographic Identity Documentation**

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

**Examples of Proof of Address**

- Bank statements/credit card statements.
- Utility bill.
- Household/motor insurance certificate and renewal notices.
- Correspondence from local authorities.
- Correspondence from the revenue commissioners or equivalent.
- Correspondence from any government body.
- Driving licence which confirms the address provided it has not also been used to satisfy the photographic identity requirement above.
- Payslip or salary advice dated within the previous 3 months.
- Confirmation of address from a lawyer or financial institution.

Note: All documentation must reflect the current residential address and must be dated within the previous 3 months other than in the case of an official document known to be issued only or typically at fixed intervals of more than 3 months, in which case such document may be accepted during that period, to a maximum of 12 months (e.g. correspondence from local authorities).

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**Certification of Documents – Required for High Risk countries**

Certified copies of personal identification documents and corporate documentation are required for certain identified investors. Documents must be a 'certified true copy of original'.

In terms of certifying a document as a true copy, certification means that there is an original signature on the document from a suitable person that can be independently verified.

Suitable persons include:

- An authorised signatory of a Regulated Financial Institution or Credit Institution.
- An authorised signatory of a Financial Adviser.
- A Justice of the Peace.
- A Notary Public or Practising Solicitor.
- A Practising Chartered or Certified Public Accountant.
- A person authorised to sign on behalf of an Embassy or a Consul.
- A practicing Barrister

Certification of each document should include:

- A signed statement confirming that this document is a true and accurate copy of the original document as seen by the person certifying the document.

- The name (in block capitals), occupation and contact details (address, telephone number and email address) of the person certifying the document, as a true copy of the original document.
- The date of certification of the document, as a true copy of the original document.

Note 1: Where the document, being certified as a true copy of the original document, contains a photograph, the person certifying the document as a true copy should also confirm that this a true likeness of the person named in the document.

Note 2: For multiple page documents, the certifier should sign or initial each page of the copy and confirm on the first or last page of the document the actual number of pages in the document.

Note 3: Where available, the statement of certification as a true copy of the sighted original should be accompanied by the professional stamp or seal of the certifier.

Note 4: When certifying documents as true copies, the certifier should not be a close family member of, or have any apparent or potential conflicts of interest with, the investor.

### **English Translations**

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

### **Letter of Assurance**

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

For Unregulated Nominees (of a regulated parent) or Regulated Financial Intermediary investors, please see templates below (appendix 6.1).

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

### **Equivalent Jurisdictions (i.e. jurisdictions where a presumption of comparability with Ireland may be made)**

Australia, Austria, Argentina, Belgium, Canada, Denmark, Finland, France, Germany, Greece, Guernsey, Hong Kong, Ireland, Isle of Man, Israel, Italy, Japan, Jersey, Luxembourg, Malaysia, Netherlands (including Aruba, Curacao and Saint Marten), New Zealand, Norway, Portugal, Republic of Korea, Singapore, South Africa, Spain, Sweden, Switzerland, United Kingdom and United States.

### **Deemed High Risk Countries**

Afghanistan, Albania, Angola, Azerbaijan, Bahamas, Bangladesh, Barbados, Belarus, Belize, Benin, Bolivia, Bosnia and Herzegovina, Botswana, Brazil, Burma (Myanmar), Burundi, Cabo Verde, Cambodia, Central African Republic, Chad, China, Colombia, Comoros, Congo (Republic of the), Costa Rica, Cyprus (Greek Cypriot administered), Cyprus (Turkish Cypriot administered), Dominican Republic, Ecuador, Egypt, El Salvador, Equatorial Guinea, Ethiopia, Ghana, Guatemala, Guinea, Guinea Bissau, Guyana, Haiti, Honduras, Iceland, India, Iraq, Ivory Coast (Cote d'Ivoire), Jamaica, Jordan, Kyrgyzstan, Laos, Latvia, Lebanon, Liberia, Libya, Macau, Maldives, Mali, Mauritania, Mauritius, Mexico, Moldova, Monaco, Mongolia, Montenegro, Morocco, Mozambique, Nicaragua, Nigeria, Pakistan, Palestinian Territories, Panama, Peru, Russia, Saint Kitts and Nevis, Saudi Arabia, Senegal, Serbia, Sierra Leone, Somalia, South Sudan, Sri Lanka, Swaziland, Tanzania, Trinidad and Tobago, Turkey, Turkmenistan, Uganda, United Arab Emirates, Uzbekistan, Vanuatu, Venezuela, Vietnam, Yemen and Zimbabwe.

Note: Northern Trust reviews the risks associated with all locations on a regular basis. The risk associated with a location may change over time. Northern Trust reserves the right to apply a different risk rating than shown in this document.

**Regulated Credit or Financial Institution**

Where the applicant is a Regulated Credit or Financial Institution in one of the above referenced Equivalent Jurisdictions, please provide the following:

1. Proof of regulation.
2. Identify any beneficial owner entitled to 25% or more (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the entity. Where there is no beneficial owner entitled to 25% or more, then the natural person(s) who hold the position of director(s) of the entity must be identified (along with address, date of birth and nationality).

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

1. Full name of the company
2. Registered number of the company
3. Registered office address & principal business address of the company,
4. Details of directors of the company and verify the identity of two directors, or where applicable, one director and one authorised signatory.
5. Identify and verify any beneficial owner beneficially entitled to 25% or more (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the entity. Where there is no beneficial owner entitled to 25% or more, the natural person(s) who hold the position of director(s) of the entity must be identified.

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

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

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

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

Where the applicant is domiciled in an aforementioned high risk jurisdiction, the following is also required

8. Identify and verify the identity of any beneficial owner beneficially entitled to more than 10% (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the company.
9. Confirmation as to whether the company is investing on its own behalf or on behalf of underlying investors and (as applicable) identify and verify the identity of any beneficial owner entitled to more than 10% of the investment.

Where the applicant is domiciled in an aforementioned high risk jurisdiction, documentation should be certified as true copies of the original.

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**Nominee Company**

Where the applicant is a Regulated Nominee Company from one of the above referenced Equivalent Jurisdictions, please provide the following:

1. Proof of regulation.
2. A letter of assurance from the regulated nominee company
3. Identify any beneficial owner entitled to 25% or more (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the parent entity. Where there is no beneficial owner entitled to 25% or more, then the natural person(s) who hold the position of director(s) of the entity (investor) must be identified (along with address, date of birth and nationality).

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

1. Letter of Assurance from the Regulated Credit or Financial Institution (Parent Company).
2. Identify any beneficial owner entitled to 25% or more (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the entity. Where there is no beneficial owner entitled to 25% or more, then the natural person(s) who hold the position of director(s) of the entity (investor) must be identified (along with address, date of birth and nationality).

Alternatively, where an acceptable AML letter of assurance can't be provided by the regulated parent company with respect to the nominee company, please provide the following:

1. Full name of the nominee company.
2. Registered number of the nominee company.
3. Registered office address & principal business address of the nominee company.
4. Details of directors of the company and verify the identity of two directors, or where applicable, one director and one authorised signatory.
5. Proof of regulation for the Regulated Parent Company.
6. Identify and verify any beneficial owner beneficially entitled to 25% or more (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the entity. Where there is no beneficial owner entitled to 25% or more, the natural person(s) who hold the position of director(s) of the entity (investor) must be identified.

Note: Where the nominee company is not a subsidiary of a regulated parent company, verify any beneficial owner entitled to 25% or more (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the entity.

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

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

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

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

9. Identify and verify the identity of any beneficial owner beneficially entitled to more than 10% (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the company.

10. Confirmation as to whether the company is investing on its own behalf or on behalf of underlying investors and (as applicable) identify and verify the identity of any beneficial owner entitled to more than 10% of the investment.

Where the applicant is domiciled in an aforementioned high risk jurisdiction, documentation should be certified as true copies of the original.

### **Listed Company**

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

1. Please provide proof of listing on a Regulated Market.

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

1. Proof of listing of the company.
2. Full name of the company.
3. Registered number of the company.
4. Registered office address & principal business address of the company.
5. Details of directors of the company and verify the identity of two directors, or where applicable, one director and one authorised signatory.
6. Identify and verify any beneficial owner beneficially entitled to 25% or more (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the entity. Where there is no beneficial owner entitled to 25% or more, the natural person(s) who hold the position of director(s) of the entity must be identified.

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

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

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

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

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

9. Identify and verify the identity of any beneficial owner beneficially entitled to more than 10% (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the entity.
10. Confirmation as to whether the company is investing on its own behalf or on behalf of underlying investors and (as applicable) identify and verify the identity of any beneficial owner entitled to more than 10% of the investment.

Where the applicant is domiciled in an aforementioned high risk jurisdiction, documentation should be certified as true copies of the original.

### **Subsidiary of a Listed Company**

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

1. Proof of listing for the listed parent company on a Regulated Market (E.g. a regulated market that subjects companies, whose securities are admitted to trading, to disclosure obligations which are consistent with the Legislation of the European Communities- see above Equivalent Jurisdictions).
2. Evidence of ownership by the listed company.
3. Identify the beneficial owner(s) including the natural person(s) who hold the position of director(s) of the entity (investor) must be identified (along with address, date of birth and nationality).

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

1. Full name of the subsidiary company.
2. Registered number of the subsidiary company.
3. Registered office address & principal business address of the subsidiary company.
4. Details of directors of the company and verify the identity of two directors, or where applicable, one director and one authorised signatory.
5. Identify and verify any beneficial owner beneficially entitled to 25% or more (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the entity. Where there is no beneficial owner entitled to 25% or more, the natural person(s) who hold the position of director(s) of the entity must be identified.

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

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

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

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

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

8. Identify and verify the identity of any beneficial owner beneficially entitled to more than 10% (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the company.
9. Confirmation as to whether the company is investing on its own behalf or on behalf of underlying investors and (as applicable) identify and verify the identity of any beneficial owner entitled to more than 10% of the investment.

Where the applicant is domiciled in an aforementioned high risk jurisdiction, documentation should be certified as true copies of the original.

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### **Government / Public Body**

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

1. Please provide background information sourced from a reliable source (e.g. copy of the legal instrument establishing the government body/public authority and listing the names of key officials).

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

1. Full name of the government body or public authority.
2. Nature and status of the government body or public authority.
3. Registered office address.
4. Name of the home state of the public authority and details of the nature of its relationship with the public authority.
5. Evidence of ownership of the public authority.
6. Names of the main officials of the government body or public authority and verify the identity of two officials or, where applicable, one official and one authorised signatory.
7. Appropriate background information on the government body or public authority.

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

8. Identify and verify the identity of at least two directors or, where applicable, one director and one authorised signatory.
9. Certified copy of the audited financial statements of the government body or public authority.

Where the applicant is domiciled in an aforementioned high risk jurisdiction, documentation should be certified as true copies of the original.

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### **Pension Scheme**

Where the applicant is an Employee/Superannuation or similar scheme in one of the above referenced Equivalent Jurisdictions, please provide the following confirmations from the trustees of the scheme:

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

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

Where the applicant is not an Employee/ Superannuation or similar scheme in one of the above referenced Equivalent Jurisdictions, please provide the following:

1. Full name of the pension scheme.
2. Registered office address of the pension scheme
3. One of the following:
  - Confirmation of registration of the pension scheme (as appropriate) from the relevant tax authorities or pensions board.
  - Or
  - Identity of the controllers (trustees/ directors/ governors /board members or equivalent) of the scheme; and
  - Constitutional/Formation Document (e.g. Trust Deed); and

- Appropriate background information.

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

4. Identify and verify the identity of the scheme administrator and entity carrying out AML/CTF controls on scheme investors (per legal form); or
5. Written confirmation from the entity carrying out AML/CTF controls similar to that requested from a regulated third party undertaking due diligence.

Where the applicant is domiciled in an aforementioned high risk jurisdiction, documentation should be certified as true copies of the original.

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### **Collective Investment Scheme**

Where the applicant is a Collective Investment Scheme ('CIS') regulated as a designated person or listed on a regulated financial market in one of the above referenced Equivalent Jurisdictions, please provide the following:

1. Please provide proof of regulation/ listing.

Where the CIS is not either listed on a regulated financial market (as above) or regulated as a designated person in one of the above referenced Equivalent Jurisdictions, please provide the following:

1. Full name of the CIS.
2. Registered address of the CIS.
3. Prospectus or equivalent.
4. Name and address of the scheme promoter.
5. Name and address of the scheme administrator.
6. Name and address of the entity carrying out due diligence on the investors in the CIS and confirmation that this entity is regulated for AML purposes.
7. Names of any investors (beneficial owners) in the CIS who own 25% or more (directly or indirectly) of the share capital. Where CIS is a corporate body and there is no beneficial owner entitled to 25% or more, the natural person(s) who hold the position of director(s) of the entity (investor) must be identified

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

8. Identify and verify the identity of any beneficial owner beneficially entitled to more than 10% (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the entity; or
9. Written confirmation from the entity carrying out AML/CTF controls similar to that requested from a regulated third party undertaking due diligence.

Where the applicant is domiciled in an aforementioned high risk jurisdiction, documentation should be certified as true copies of the original.

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### **Individuals (including Joint Account Holders)**

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

1. Photographic identity document.
2. Proof of address.

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

3. Confirmation of Source of Funds.
4. Confirmation of Source of Wealth.

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

Where the applicant is domiciled in an aforementioned high risk jurisdiction, documentation should be certified as true copies of the original.

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### **Private and Unlisted Company**

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

1. Full name of the company.
2. Registered number of the company.
3. Registered office address & principal business address of the company.
4. Details of the directors of the company and verify the identity of at least two directors or, where applicable, one director and one authorised signatory.
5. Identify and verify any beneficial owner beneficially entitled to 25% or more (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the entity. Where there is no beneficial owner entitled to 25% or more, the natural person(s) who hold the position of director(s) of the entity (investor) must be identified.

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

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

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

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

7. Identify and verify the identity of any beneficial owner beneficially entitled to more than 10% (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the entity.

Where the applicant is domiciled in an aforementioned high risk jurisdiction, documentation should be certified as true copies of the original.

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### **Limited Liability Company**

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

1. Full name of the LLC.
2. Registered office address & principal business address of the LLC.
3. Identify all managing members
4. Verify the identity of at least two managing members or, where applicable, one managing member and one authorised signatory.
5. Identify and verify any beneficial owner beneficially entitled to 25% or more (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the entity. Where there is no

beneficial owner entitled to 25% or more, the natural person(s) who hold the position of director(s) of the entity must be identified.

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

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

6. Constitutional document for the LLC (e.g. Certificate of Formation).
7. Operating agreement for the LLC

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

8. Identify and verify the identity of any beneficial owner beneficially entitled to more than 10% (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the entity.

Where the applicant is domiciled in an aforementioned high risk jurisdiction, documentation should be certified as true copies of the original.

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### **Partnership**

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

1. Full name of the partnership.
2. Registered office address & principal business address of the partnership.
3. Identify all partners (where practical)
4. Verify the identity of all partners who own 25% or more (directly or indirectly) of the partnership capital, profit or voting rights or otherwise exercise control over the management of the Partnership Fund.
5. Verify the identity of the general partner and a second partner (or in the absence of same an authorised signatory).

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

6. Constitutional document for the Partnership (e.g. Partnership Agreement).

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

7. Identify and verify the identity of at least two partners or, where applicable, one partner and one authorised signatory.
8. Identify and verify the identity of any beneficial owner beneficially entitled to more than 10% (directly or indirectly) of the share capital, profit or voting rights or otherwise exercise control over the management of the partnership.

Where the applicant not a Partnership Fund or is domiciled in an aforementioned high risk jurisdiction, documentation should be certified as true copies of the original.

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**Trust**

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

1. Full name of trust.
2. Country of establishment of trust.
3. Legal form of the trust.
4. Trust deed or equivalent or confirmation of the trust etc. by reference to an appropriate register.
5. Confirmation of the nature/purpose of the trust.
6. Identify all Trustees and verify the identity of at least two trustees where applicable.
7. Identify the settlor and verify the settlor where practicable.
8. Identify and verify the protector.
9. Identify all beneficiaries or the class of beneficiary beneficially entitled to trust's assets or the beneficial interest. (Verification of the class of beneficiary will only be required where payment is made directly to the beneficiary).
10. Verify the identity of the beneficiaries to the extent warranted by the risk.

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

Where the applicants are not Regulated Trustees investing on behalf of a Trust, or where the applicant is domiciled in an aforementioned high risk jurisdiction, the following is also required:

11. Verify the identity of the beneficiaries beneficially entitled to trust's assets or beneficial interest, where practicable
12. Confirmation as to how the settlor was in a position to make the investment.
13. Verify the identity of all trustees (i.e. in accordance with their legal structure or for each individual)

Where the applicants are not Regulated Trustees investing on behalf of a Trust or where the applicant is domiciled in an aforementioned high risk jurisdiction, documentation should be certified as true copies of the original.

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**Foundation**

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

1. Full name of the foundation.
2. Registered address of the foundation.
3. Confirmation of the legal form of the Foundation.
4. Constitutional documents equivalent OR confirmation of the foundation by reference to an appropriate register.
5. Identify and verify the founder and where practical and the nature/purpose of the foundation.
6. Identify all trustees, and verify the identity of two trustees, where applicable. Identify any beneficiary beneficially entitled to 25% or more of the foundation's assets.
7. Note: Where there is a named individual beneficiary with a 25% interest or more, the beneficiary will need to be verified.

Note: Where there is a named individual beneficiary with a 25% interest or more, the beneficiary will need to be verified.

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

Where the applicants are not Regulated Trustees investing on behalf of a Foundation or similar entity, or where the applicant is domiciled in an aforementioned high risk jurisdiction, the following is also required:



8. Identify and verify the identity of the founder.
9. Confirmation of the funding of the foundation.
10. Identify and verify the identity of the beneficiaries who hold more than 10% of the beneficial interest, where practicable.

Where the applicant is domiciled in an aforementioned high risk jurisdiction, documentation should be certified as true copies of the original.

### **Charity**

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

1. Full name of the charity.
2. Nature/purpose of the charity
3. Nature and source of funding of the charity
4. Registered office address & principal business address of the charity.
5. Names of all trustees/directors (or equivalent) of the charity.
6. Identify and verify the identity of the company secretary or equivalent or, where applicable, verify the identity of one of the trustees.
7. (If a charitable trust), details of the settlor of the charitable trust.
8. Names or classes of persons who stand to benefit from the objects of the charity.
9. Copy of relevant charities register or confirmation of the registration of the charity with the relevant tax authorities (e.g. UK Charities Commission/ HMRC).

Note: Where there is a named individual beneficiary with a 25% interest or more, the beneficiary will need to be verified.

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

10. Certified copies of the audited financial statements.
11. Identify and verify the identity of at least two trustees /directors/governors/ board members or, where applicable, one trustee /director/governor/ board member/ company secretary and one authorised signatory of the charity.
12. Certified constitutional/ formation document of the charity.
13. Identify and verify the identity of the beneficiaries (where ascertainable) of the charity.
14. Identify and verify the settlor, where applicable.

Note: Where the applicant is not a registered Charity, documentation provided should be certified as true copies of the original documentation.

### **Club or Society**

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

1. Full name of the club/society.
2. Registered office address & principal business address of the club/society.
3. Confirmation of the legal status of the Club/Society.
4. Nature/Purpose including the nature of funding of the club/society.
5. Constitutional/Formation Document (e.g. Trust Deed) and/or copy of audited financial statements (if available) or confirmation of a relevant club/ society register.
6. List of officers of the club/society.

7. Verify the identity of two officers of the Club/Society authorised to operation on behalf of the club/society or, where applicable, one officer and one authorised signatory.
8. Names or classes of persons who stand to benefit from the Club or Society.

Note: Where there is a named individual beneficiary with a 25% interest or more, the beneficiary will need to be verified.

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

9. Audited financial statements for the Club/Society.
10. Constitutional/ formation document of the club/society
11. Identify and verify the identity of all persons who own or control over 10% of the entity's share capital, profit or voting rights.
12. Confirmation of the funding of the club or society.

Where the applicant is domiciled in an aforementioned high risk jurisdiction, documentation should be certified as true copies of the original.

### **School, College or University**

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

1. Full name of the School, College or University.
2. Registered office address & principal business address of the School, College or University.
3. Confirmation of a relevant School, College or University register or appropriate background information.
4. Names of main officials of the school.
5. Identify and verify the identity of at least two officials or, where applicable, one official and one authorised signatory.
6. Details of ownership of the entity. In particular, confirmation if in public ownership or independent. Where independently owned, identify and verify all persons who own or control 25% or more of the entity's share capital, profit or voting rights.
7. Identify and verify the settlor, where applicable.

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

8. Identify and verify the identity of all persons who own or control over 10% of the entity's share capital, profit or voting rights.

Where the applicant is domiciled in an aforementioned high risk jurisdiction, documentation should be certified as true copies of the original.

### **Church**

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

1. Full name of the Church.
2. Registered office address & principal business address of the church.
3. Confirmation of the nature/purpose of the Church with details of how the Church is funded.
4. Confirmation of a relevant church register or a copy of the revenue approval for the church;
5. Names of all trustees/directors (or equivalent) of the church.
6. Identify and verify the identity of the church secretary or equivalent or, where applicable, verify the identity of one of the trustees.
7. Names or classes of persons who stand to benefit from the objects of the church (where ascertainable).
8. Identify and verify the settlor where applicable.
9. Where there is a named individual beneficiary with a 25% interest or more, the beneficiary will need to be verified.

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

10. Audited financial statements for the church.
11. Constitutional/formation document of the church.
12. Identify and verify the identity of either two trustees /directors/governors/ board members or one trustee/ director/governor/board member and one authorised signatory of the church.
13. Identify and verify the beneficiaries (where ascertainable)

Where the applicant is domiciled in an aforementioned high risk jurisdiction, documentation should be certified as true copies of the original.

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### **Trade Union**

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

1. Full name of the Trade Union.
2. Registered address of the trade union.
3. Establish whether the trade union is registered or otherwise listed by a controlling body for regulatory or oversight purposes (e.g. Congress of Trade Unions).
4. Consider the legal form of the trade union, its stated purpose, aims and objectives using information from documents supplied for the trade union and through internet searches.
5. Deed or equivalent establishing the existence of the trade union (for example its constitution, bye-laws, rules).
6. Identify all persons and their functions who are empowered to make the investment on behalf of the trade union (president, secretary, treasurer and other senior committee members).

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

7. Identify and verify the identity of at least two senior committee members of the trade union

Where the applicant is domiciled in an aforementioned high risk jurisdiction, documentation should be certified as true copies of the original.

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**Appendix 6.1 – Letters of Assurance Requirements (provision in advance)- Unregulated Nominees and Regulated Credit or Financial Institution**
**Unregulated Nominee Letter of Assurance**

[On Letterhead of the Regulated Parent Company]

[Date]

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

**Re:** *[Insert Name of Unregulated Nominee/ Intermediary Company]* (“the Nominee Company”)- Verification of Investor(s) Identity in accordance with applicable Anti Money Laundering and Counter Terrorist Financing (“AML/CFT”) Laws and Regulations<sup>4</sup>

Dear Sir/ Madam,

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

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

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

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

- i. we have established AML/CFT policies, procedures and internal controls to ensure ongoing compliance with applicable AML/CFT and economic sanctions laws and regulations \_\_\_\_\_ *(insert relevant law/regulation here)*;
- ii. our AML/CFT policies, procedures and internal controls incorporate systems and controls to identify and verify our customers and beneficial owners<sup>5</sup>, to identify source of funds, and performs (i) appropriate risk-grading procedures to differentiate between customer due diligence for high and low risk relationships (ii) ongoing customer due diligence, (iii) regular AML/CFT monitoring and sanction screening, (iv) staff AML/CFT training and (v) detect, investigate and, as required, report any suspicious activities to the relevant authorities;
- iii. we have systems and controls in place to identify Politically Exposed Persons, their relatives and close associates (collectively PEPs) and we conduct enhanced due diligence, including establishing the source of wealth and the source of funds, and enhanced ongoing monitoring on PEPs and other high risk customers.

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

- iv. the accounts will only be operated by the Nominee and / or the Parent Company whom maintain ultimate, effective control over the account:

<sup>4</sup> Please complete the Declaration of Beneficial Ownership below.

<sup>5</sup> Beneficial owner includes the natural person(s) who ultimately owns or controls a customer and/or the natural person(s) on whose behalf a transaction is being conducted. It also includes those persons who exercise ultimate effective control over a legal person or arrangement.

- v. we have performed customer due diligence and identified and verified the beneficial owner(s) (to the extent warranted by risk of money laundering and the financing of terrorism), and have obtained the information on the purpose and the intended nature of the business relationship;
- vi. to the best of our knowledge, we are unaware of any activities on the part of the customer(s), their beneficial owners which could lead us to suspect an involvement in criminal conduct: money laundering or terrorist activities;
- vii. we will retain documents and information on the customer(s), including any beneficial owner, obtained as part of customer identification and verification process for at least 5 years after the termination of their relationship with us;
- viii. we will provide the Fund and/or Northern Trust with related customer due diligence documents and information, which we may have on our files relating to the identity of the customer(s) and beneficial owner(s) upon request;
- ix. none of the customer(s) including any beneficial owner are subject to sanctions lists administered by the European Union, the United States (including OFAC) and the United Nations, and we undertake to notify you immediately upon our identification of same should we become aware of such circumstances;
- x. we will notify the Fund and/or Northern Trust, on request, of its identification of PEPs.

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

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

Yours faithfully,

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

For and on behalf of

*[Regulated Entity]*

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**Regulated Credit or Financial Institution Letter of Assurance (as Investor)**

[On Letterhead of the Regulated Financial Intermediary]

[Date]

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

**Re:** **[Insert Name of Regulated Financial Intermediary Company]**- Verification of Identity in accordance with applicable Anti Money Laundering and Counter Terrorist Financing (“AML/CFT”) Laws and Regulations<sup>6</sup>

Dear Sir/ Madam,

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

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

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

- i. we have established AML/CFT policies, procedures and internal controls to ensure ongoing compliance with applicable AML/CFT and economic sanctions laws and regulations \_\_\_\_\_ **(insert relevant law/regulation here)**;
- ii. our AML/CFT policies, procedures and internal controls incorporate systems and controls to identify and verify our customers and beneficial owners<sup>7</sup>, to identify source of funds, and performs (i) appropriate risk-grading procedures to differentiate between customer due diligence for high and low risk relationships (ii) ongoing customer due diligence, (iii) regular AML/CFT monitoring and sanction screening, (iv) staff AML/CFT training and (v) detect, investigate and, as required, report any suspicious activities to the relevant authorities;
- iii. we have systems and controls in place to identify Politically Exposed Persons, their relatives and close associates (collectively PEPs) and we conduct enhanced due diligence, including establishing the source of wealth and the source of funds, and enhanced ongoing monitoring on PEPs and other high risk customers.

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

- iv. the accounts will only be operated by the financial intermediary whom maintain ultimate, effective control over the account;
- v. we have performed customer due diligence and identified and verified the beneficial owner(s) (to the extent warranted by risk of money laundering and the financing of terrorism), and have obtained the information on the purpose and the intended nature of the business relationship;
- vi. to the best of our knowledge, we are unaware of any activities on the part of the customer(s), their beneficial owners which could lead us to suspect an involvement in criminal conduct: money laundering or terrorist activities;

<sup>6</sup> Please complete the Declaration of Beneficial Ownership below.

<sup>7</sup> Beneficial owner includes the natural person(s) who ultimately owns or controls a customer and/or the natural person(s) on whose behalf a transaction is being conducted. It also includes those persons who exercise ultimate effective control over a legal person or arrangement.

- vii. we will retain documents and information on the customer(s), including any beneficial owner, obtained as part of customer identification and verification process for at least 5 years after the termination of their relationship with us;
- viii. we will provide the Fund and/or Northern Trust with related customer due diligence documents and information, which we may have on our files relating to the identity of the customer(s) and beneficial owner(s) upon request;
- ix. none of the customer(s) including any beneficial owner are subject to sanctions lists administered by the European Union, the United States (including OFAC) and the United Nations, and we undertake to notify you immediately upon our identification of same should we become aware of such circumstances;
- x. we will notify the Fund and/or Northern Trust, on request, of its identification of PEPs.

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

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

Yours faithfully,

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

For and on behalf of

*[Regulated Entity]*

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**Beneficial Owner(s) Declaration**

Please tick one of the below boxes and complete the relevant section:

- We confirm there is a natural person(s) who is a beneficial owner of the investor (Please complete section 1 below of this declaration).
- We confirm there is no natural person(s) who is a beneficial owner of the investor (Please complete section 2 of this declaration).

<b>Section 1: Natural person(s) who is a beneficial owner of the investor</b>		
<b>Beneficial Owner 1</b> (please complete in block capitals):		
Full Name:	Identification Number:	Occupation:
Date of Birth (DD-MM-YYYY) :	Place of Birth:	Nationality:
Shareholding %:		
Registered Address (PO Box or Care of will not be accepted):		
City, Town, State, Province or County	Postal/ZIP Code:	Country:
<b>Beneficial Owner 2</b> (please complete in block capitals):		
Full Name:	Identification Number:	Occupation:
Date of Birth (DD-MM-YYYY) :	Place of Birth:	Nationality:
Shareholding %:		
Registered Address (PO Box or Care of will not be accepted):		
City, Town, State, Province or County	Postal/ZIP Code:	Country:
<b>Beneficial Owner 3</b> (please complete in block capitals):		
Full Name:	Identification Number:	Occupation:
Date of Birth (DD-MM-YYYY) :	Place of Birth:	Nationality:
Shareholding %:		
Registered Address (PO Box or Care of will not be accepted):		
City, Town, State, Province or County	Postal/ZIP Code:	Country:
<b>Beneficial Owner 4</b> (please complete in block capitals):		
Full Name:	Identification Number:	Occupation:
Date of Birth (DD-MM-YYYY) :	Place of Birth:	Nationality:
Shareholding %:		
Registered Address (PO Box or Care of will not be accepted):		
City, Town, State, Province or County	Postal/ZIP Code:	Country:



**Section 2: No natural person(s) who is a beneficial owner of the investor.**

In the event where no natural person falls under the above scenario, the senior managing official(s) of the subscribing Nominee entity will be recorded as the Beneficial Owner (not any underlying customer of the entity / designation).

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

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

Full Name

Date of Birth (DD-MM-YYYY) : Place of Birth: Nationality:

Registered Address (PO Box or Care of will not be accepted): Title:

City, Town, State, Province or County: Postal/ZIP Code: Country:

*If needed, please add additional senior managing officials on a separate sheet*

Yours faithfully,

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

For and on behalf of

*[Regulated Entity]*

<sup>1</sup> **Beneficial Owner:** A Beneficial Owner is any individual who ultimately owns or controls an investor or on whose behalf a transaction is conducted.

- A. Beneficial Owner, in relation to a body corporate which is not a company whose securities are listed on a Regulated Market (markets in financial instruments and located within the European Economic Area, or that subjects companies, whose securities are admitted to trading, to disclosure requirements consistent with EU legislation), is any individual who ultimately owns or controls, whether through direct or indirect ownership or control (including through Bearer Shareholdings), 25% or more of the shares or voting rights of the body corporate or through control via other means.

Beneficial owner, in relation to a body corporate::

(i) A shareholding of 25% or more or an ownership interest of 25% or more in the customer held by a natural person shall be an indication of direct ownership. (ii) A shareholding of 25% or more or an ownership interest of 25% or more in the customer held by a corporate entity, which is under the control of a natural person(s), or by multiple corporate entities, which are under the control of the same natural person(s), shall be an indication of indirect ownership. (iii) Where there is no person identified as beneficial owner, or if there is any doubt that the person(s) identified are the beneficial owner(s), the natural person(s) who hold the position of senior managing official(s)/ director(s) of the investor, will be deemed the beneficial owners.

- B. Beneficial Owner, in relation to a partnership (other than a limited liability partnership), means any individual who:
  - (i) ultimately is entitled to or controls, whether the entitlement or control is direct or indirect, 25% or more of the share of the capital or profits of the partnership or 25% or more of the voting rights in the partnership; or (ii) controls the partnership.
- C. Beneficial Owner, in relation to a trust, means all of the following:
  - (i) the settlor; (ii) the trustees; (iii) any individual who is determined as being entitled to a vested interest in possession, remainder or reversion, whether or not the interest is defeasible, in the capital of the trust property (a beneficiary); (iv) in the case of a trust other than one that is set up or operates entirely for the benefit of individuals referred to in the paragraph relating to body corporates above, (v) the class of individuals in whose main interest the trust is set up or operates; or any individual (including the settlor, protector or trustees) who has control over the trust.
- D. Beneficial Owner, in relation to a foundation or other legal arrangement similar to a trust, means those individuals who hold equivalent or similar positions to those set out above.