

Find enclosed herewith our company formation questionnaire and related documentation required to commence a business relationship with St. George's International Limited. This documentation is requested such that we may fully understand your circumstances and will enable us to provide corporate administration services to best meet your objectives. In the event that certain information requested is not applicable to your circumstances, please complete the relevant box by stating "Not applicable".

## **POLICY ON ACCEPTANCE OF NEW BUSINESS**

It is the policy of St. George's International Limited to enter into client relationships with reputable individuals. We will not knowingly assist in the contravention of the laws and regulations of any country, nor will we accept any business, the nature of which would, or might, for any reason, call into question the integrity of St. George's International Limited. It is our mandate to "know our client" and this will help to ensure that our clients enjoy the advantages of a reputable service provider.

In accordance with our legal obligations, every prospective customer, beneficial owner or other individual who owns a 10% or greater interest in or contributes property to the company will be required to provide in advance of the commencement of business relationship a number of customer due diligence documents ("CDD"), as detailed further in this New Client Document Package.<sup>1</sup> We understand that such information may be sensitive and we undertake to hold same in confidence.

On acceptance of new business we will observe the following business practices:

- Whenever possible, we prefer to meet with prospective clients before accepting the business;
- All appointments of individual staff members of St. George's International Limited as directors or officers of companies must be agreed by such persons in advance of such appointment;
- We will open and maintain investment, custodian or other accounts with acceptable institutions in Bermuda, the Cayman Islands or elsewhere, when required for efficient administration of the company;
- Any person proposed for appointment as investment advisor must be able to demonstrate competence in the provision of investment advice; and
- We will make such enquiries as we deem appropriate to ascertain the origin of money or other assets contributed to the company.

## **1. GENERAL COMPANY INFORMATION**

(a) Proposed company name and two alternatives

1.	
2.	
3.	

(b) Please confirm desired jurisdiction of incorporation:

☐ Cayman Islands   ☐ British Virgin Islands   ☐ Other \_\_\_\_\_

<sup>1</sup> We reserve the right to request CDD in respect of shareholders with less than a 10% interest in the company.

## 2. PURPOSE FOR WHICH THE COMPANY IS BEING ESTABLISHED

### (a) Investment holding company?

If so, please provide a detailed description of the types and values of assets it is anticipated the Company will hold (i.e. portfolio of marketable securities held at *ABC Investors Limited* in New York; private equity investments in *ABC Company Limited*, a Delaware company in the fintech industry; real estate holding for a property located in Bahamas held for personal use by family members, etc.). Please also provide an explanation of anticipated transactions, frequency and size (in dollar terms) of anticipated transactions together with jurisdiction(s) and counterparties:

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### (b) Operating company?

If the Company will be an operating company, please state the precise nature and jurisdiction(s) of the Company's intended business to clearly identify the nature and purpose of the Company. Please also provide an explanation of anticipated transactions, frequency and size (in dollar terms) of anticipated transactions together with jurisdiction(s) and counterparties:

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## 3. SHARE CAPITAL & COMPANY OWNERSHIP

### (a) Share Capital

Please state the amount, currency and par value of the Company's authorised share capital (standard option is US\$50,000.00 divided into 50,000 shares of US\$1.00):

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### (b) Shareholders/Beneficial Owners

It is possible to own shares of the Company directly in your own name, or alternatively through a nominee. Where shares are held through a nominee, we require full disclosure of the ultimate beneficial ownership of the Company.

Where the ultimate beneficial owner of the Company is an individual, he or she must complete the enclosed **Personal Information Form** and provide the CDD detailed therein.

Where the ultimate owner is a private company, each shareholder of that company must complete the enclosed **Personal Information Form** and provide the CDD detailed therein. In addition, the latest financial statements (if any) of the company should be provided together with certified copies of the Certificate of Incorporation, Memorandum of Association and Bye-laws, Register of Members, Register of Directors & Officers and Certificate of Incumbency.

Where the ultimate beneficial owner is a public company, quoted on a recognized stock exchange, it will be necessary to specify the name and address of the company, the stock exchange(s) on which it is listed and copies of the latest annual or quarterly report.

Where the ultimate beneficial owner is a trust, it will be necessary to provide the name of the trust, date and country of establishment, name and address of trustees, certified copy of the trust deed, and the settlor, protector and each adult beneficiary must complete the enclosed **Personal Information Form** and provide the CDD detailed therein.

Where the ultimate beneficial owner is a partnership, it will be necessary for each general and limited partner to complete the enclosed **Personal Information Form** and provide the CDD detailed therein, and provide a copy of the most recent financial statements of the partnership.

(c) Allotment of Shares

<i>Shareholder / Beneficial Owner Name:</i>	<i>Address:</i>	<i>Number of shares:</i>	<i>Shares to be registered in own name or to nominee?</i>

(d) Do you wish to have share certificates issued and if so, who will have custody of the certificates?

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**4. FUNDING OF THE COMPANY**

(a) Once the company is incorporated, please confirm if there will be an additional contribution(s) to the capital or surplus of the Company in order to fund the company? ☐ Yes ☐ No

(i) If so, in what amount?

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- (ii) In what form (i.e. contribution to surplus, shareholder loan, share premium, etc.)? If a contribution to surplus, please confirm the source of the funds. If a shareholder loan, please provide a summary of the anticipated loan parties and basic terms?

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A **Declaration Regarding Source of Wealth, Source of Funds and Solvency** (enclosed) must be provided in relation to any contribution of funds by one or more persons to the Company.

- (b) Do you require a tax exemption certificate to be issued for the Company (if available)? ☐ Yes ☐ No

## 5. MANAGEMENT OF THE COMPANY

- (a) Please provide the names of directors and officers (if desired, President and Vice-President or Chairman and Deputy Chairman, etc.). If you wish to appoint our corporate director, Kent Limited and/or St. George's International Limited, to act as a Director and Secretary, respectively, please indicate this below.

Name & Address:	
<i>Office to be held:</i>	
Name & Address:	
<i>Office to be held:</i>	
Name & Address:	
<i>Office to be held:</i>	
Name & Address:	
<i>Office to be held:</i>	

A **Personal Information Form** (enclosed) should be attached for each intended Director and Officer, together with the CDD detailed therein.

(b) Primary contact number for the purpose of giving notice of members and directors meetings:

(i) Members meetings:

Contact person:	
Telephone:	
Email:	

(ii) Directors meetings:

Contact person:	
Telephone:	
Email:	

(c) Date of termination of financial year:

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(d) First accounting period will end on:

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(e) Articles of Association

Please detail any special requirements or matters to be incorporated into the Articles of Association. A specimen copy of our standard Articles of Association is available on request.

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## 6. BANK ACCOUNTS

Please specify the bank at which the Company will open accounts. If accounts will be required at more than one bank, please attach a separate sheet:

Name and address of Bank:	
Type and currency of account:	

Details of signing authority, together with names and addresses of authorised signatories:	
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**7. BILLING PARTY, ADDRESS, CONTACT NUMBERS & EMAIL:**

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\_\_\_\_\_  
*Client Signature(s)*

Dated this \_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_



**ST. GEORGE'S  
GROUP**

## DECLARATION REGARDING SOURCE OF WEALTH AND SOURCE OF FUNDS

*(to be completed by the Settlor/Shareholder and any other individual proposing to transfer property to the trust or company)*

**To:** St. George's Group Limited *(and its subsidiaries, as applicable)*

**Re:** \_\_\_\_\_ (the "Entity"); I, \_\_\_\_\_ hereby declare and confirm that:  
*Trust or Company Name* *Insert Your Name*

### **A. SOURCE OF WEALTH** *(new clients only, or if completing form for the first time)*

Source of wealth means the origin of your total assets. If your source of wealth is primarily from employment earnings, your response should be similar to a brief curriculum vitae, including the names of companies for which you have worked and the corresponding time periods. Alternatively, you may provide a copy of your current curriculum vitae, and write below "see attached curriculum vitae". If your source of wealth includes the sale of real property, private company shares or other marketable securities, please provide as much detail as possible, such as the location of the property, name of the private company, etc. Continue your response on a separate form if necessary.

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### **B. SOURCE OF FUNDS**

Source of funds relates to the specific assets you propose to transfer to the Entity (as opposed to your overall wealth).

1. I propose to transfer to the Entity the following property (the "Property"):  
*(provide a detailed description and approximate value of any cash, investments, real property or other assets that are proposed to be transferred to the Entity)*

- (a) \_\_\_\_\_  
(b) \_\_\_\_\_  
(c) \_\_\_\_\_

And I hereby confirm that I am the sole beneficial owner of the Property.

2. The source of funds for the Property is (check all boxes that apply and provide additional information if requested):

☐ Salary  
*Name & address of Employer(s):* \_\_\_\_\_

☐ Pension  
*Name of Pension Administrator/Service Provider:* \_\_\_\_\_

☐ Sale of Shares / Investments  
*Name of Company Sold/Investment Firm from which assets are being sent:* \_\_\_\_\_

☐ Company Profits  
*Name of Company(ies):* \_\_\_\_\_

☐ Sale of Real Property

Address of Property: \_\_\_\_\_

☐ Proceeds of Insurance Policy

Name of Insurance Company: \_\_\_\_\_

☐ Gift

Name of Donor: \_\_\_\_\_

☐ Inheritance

Name of Testator: \_\_\_\_\_

☐ Other (provide details):

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

The name and address of the bank from which the funds will be sent is:

Account Holder: \_\_\_\_\_

Bank Name: \_\_\_\_\_

Address: \_\_\_\_\_

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

### C. DECLARATION

In relation to the Property, I hereby declare that:

1. None of the Property constitutes the proceeds of crime; assets or investments acquired using the proceeds of crime; nor proceeds resulting from the sale of assets or investments acquired using the proceeds of crime.
2. In anticipation of transferring the Property to the Entity, I have taken such legal and/or accounting advice as was necessary to fully understand the impact (if any) on my tax position and the extent of any reporting obligations which I may have as a result of the transfer of the Property to the Entity. I hereby undertake to seek such updated legal and/or accounting advice as may be required from time to time should my circumstances change.
3. After I have transferred the Property to the Entity, I will hold sufficient assets to satisfy the claims of my known or reasonably foreseeable creditors and will be able to pay all of the debts as they fall due.
4. The transfer of the Property to the Entity is not being made for the purpose of defeating the claims of creditors who are either known to me at the present time or are reasonably foreseeable.

\_\_\_\_\_  
Client Signature

Dated this \_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_



Full name (including middle names and any assumed names):	
Home Telephone: Mobile Number:	
Home address:	
Home e-mail address:	
Place of birth & nationality:	
Any other citizenship(s):	
Passport number, date and place of issue:	
Marital status:	
Occupation and nature of business:	
Business address:	
Business Telephone: Fax Number: Mobile Number:	
Business e-mail address:	
Have you, or a company for which you act or have acted as director or officer, been the subject of criminal or regulatory investigations or convictions? If yes, please provide details.	
Politically Exposed Person: - Have you ever held or currently hold public or elected office? <b>If yes</b> , please provide details. <b>If not</b> please state: <b>No</b>	

<p>- Have you ever held or currently hold a prominent function in an international or Government controlled organisation? <b>If yes</b>, please provide details. <b>If not</b> please state: <b>No</b></p> <p>- Are you a family member or associate of such a person? <b>If yes</b>, please provide details. <b>If not</b> please state: <b>No</b></p>	
<p>Have you ever been the subject of an international sanction? <b>If yes</b>, please provide details. <b>If not</b> please state: <b>No</b></p>	
<p>Bank which will provide reference:</p>	
<p>How did you find St. George's Group Limited?</p>	

***The following documents are required in support of this form:***

1. A ***notarised or certified***\* copy of the identification pages of his or her passport (incorporating a photograph) and a *notarised* copy of a valid driver's licence incorporating a photograph, where the prospective client is not in possession of a passport;
2. A ***notarised or certified***\* copy of a proof of residential address such as a utility bill, bank or credit card statement (no more than three months old);
3. A reference letter from the bank or licensed financial institution confirming your financial stability and length of your relationship with the institution;
4. An introduction letter (on firm letterhead) from a reputable legal, accounting or financial services practice.

\* We will accept documents certified as true copies of the originals by a lawyer, accountant, medical doctor, notary public, police officer, judge, or justice of the peace. The certifier should include their contact details (address, phone number and email).

**Tax Residency Self-Certification**

***Please read these instructions carefully before completing the remainder of this form***

The Governments of Bermuda and the Cayman Islands, along with many others around the globe, have agreed to participate in certain intergovernmental initiatives involving the automatic exchange of account information amongst taxation authorities of foreign jurisdictions.

For example, both Bermuda and the Cayman Islands have undertaken to participate in the Common Reporting Standard ("CRS"), a multilateral reporting initiative that requires financial institutions to collect and report certain information about an individual's tax residence and account holdings to local authorities, who will in turn transmit such information to exchange partners in other jurisdictions on an annual basis.

Bermuda and the Cayman Islands are also party to intergovernmental agreements with the United States of America in respect of the Foreign Account Tax Compliance Act ("FATCA"). As a result, information regarding

certain accounts held by U.S. persons with financial institutions in Bermuda and the Cayman Islands will be reported to the IRS on an annual basis.

***Please be advised that we cannot provide tax or legal advice.***

If you have any questions about CRS or FATCA, the contents of this Tax Residency Self-Certification Form, or how to define your tax residency, please speak to your tax adviser or domestic tax authority.

Tax residence is determined by the laws of each jurisdiction, and may depend on certain factors in addition to ordinary residence. It should be noted that special circumstances may cause you to be resident for tax purposes in a jurisdiction other than where you ordinarily reside, or to be resident in more than one country at the same time (dual residency).

If you are a U.S. citizen or tax resident under U.S. law, in addition to completing this Tax Residency Self-Certification Form, you will also need to return a completed W-9 form. The W-9 form can be downloaded from the IRS website.

This Tax Residency Self-Certification Form will remain valid unless you have a change in circumstances relating to information included herein (such as a change in your tax residency or status). In that case, you must notify us and provide an updated Tax Residency Self-Certification Form within sixty (60) days of such change in circumstances.

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

Name	Date of Birth (dd / mm / yyyy)	Place & Country of Birth
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#### **Permanent Residence Address:**

Number & Street	City/Town
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State/Province/County	Post Code	Country
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#### **Mailing address (if different from above):**

Number & Street	City/Town
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State/Province/County	Post Code	Country
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## Section 2: Declaration of U.S. Citizenship or U.S. Residence for Tax purposes

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

- (a) ☐ I confirm that I am a U.S. citizen and/or resident in the U.S. for tax purposes (green card holder or resident under the substantial presence test) and my U.S. federal taxpayer identification number (U.S. TIN) is as follows: \_\_\_\_\_.
- (b) ☐ I confirm that I was born in the U.S. (or a U.S. territory) but am no longer a U.S. citizen as I have voluntarily surrendered my citizenship as evidenced by the attached documents.
- (c) ☐ I confirm that I am not a U.S. citizen or resident in the U.S. for tax purposes.

## Section 3: Declaration of Tax Residency (complete if you have non-U.S. tax residences)

I hereby confirm that I am, for tax purposes, resident in the following countries (indicate the tax identification number (TIN), social security number (SSN) *or equivalent* for each country in which you are considered to be resident for tax purposes).

	Country of tax residence	TIN / SSN	If no TIN / SSN is available please enter reason A, B, or C
1			
2			
3			

- Reason A:** The country where I am resident for tax purposes does not issue TIN / SSNs to its residents
- Reason B:** I am unable to obtain a TIN / SSN or equivalent number (please provide explanation)
- Reason C:** No TIN / SSN is required (only select this reason if the domestic law of the relevant jurisdiction does not require the collection of the TIN / SSN issued by such jurisdiction)

## Section 4: Declaration and Undertakings

I declare that the information provided in these Personal Information and Tax Residency Self-Certification Forms is, to the best of my knowledge and belief, accurate and complete. I undertake to advise St. George's Group Limited ("SGG") promptly and provide an updated Tax Residency Self-Certification Form within 60 days where any change in circumstances occurs which causes any of the information contained in this form to be inaccurate or incomplete. Where legally obliged to do so, I hereby consent to the disclosure by SGG and/or any one or more of its subsidiaries (as the case may be) of the information contained in the Tax Residency Self-Certification Form with the relevant tax information authorities.

\_\_\_\_\_  
Client Signature

Dated this \_\_\_\_ day of \_\_\_\_\_, 20 \_\_\_\_

## **GENERAL**

This Privacy Statement (the “Statement”) is designed to explain how St. George’s Group Limited and its subsidiaries, St. George’s Trust Company Limited, St. George’s Services Limited, and St. George’s International Limited (together referred to as the “Group”) collect, use, share and store the information we collect in the course of operating our trust and corporate services businesses. As a Group, we are committed to protecting your privacy and processing the information you provide to us in a safe and secure fashion.

## **THE INFORMATION COVERED BY THIS STATEMENT**

In the course of our business relationships, we may collect various types of personal information regarding you, your family, and your business interests, which may include but not be limited to the following:

- Your personal information (full legal name, date and country of birth, marital status, home and business addresses, contact information, passport information, taxpayer identification information, information relating to past investigations and convictions, politically exposed person status, and such other information about you as may be available in the public domain);
- Personal information (as above) relating to your spouse and children;
- Details regarding your employment and/or business interests;
- Financial information (source of wealth and source of funds, the identity of your professional advisors, details regarding legal and beneficial ownership of different assets, banking information, etc.); and
- Such other relevant personal information as may be required by the Group from time to time in order to discharge its legal and regulatory duties.

## **HOW WE OBTAIN INFORMATION ABOUT YOU**

The vast majority of the information we collect and retain is provided to us directly by you (or your parent or legal guardian in the event that you are a minor) in the form of client questionnaires, customer due diligence documents, email correspondence, and telephone correspondence. In certain cases, it may be necessary for us, in order to discharge our legal or regulatory duties, to obtain information about you, your family and your business interests from other sources, such as financial crime and sanctions databases, the internet, your professional advisors, and the financial institutions with which you do business.

## **HOW THE GROUP USES INFORMATION**

The Group, through its operating subsidiaries, provides trust administration services in Bermuda and corporate administration services in Bermuda and the Cayman Islands. The personal data we collect from you is required in order that we may discharge our regulatory obligations and provide you with the trust and corporate administration services you require. In addition to using your information in the course of our day-to-day dealings with you, your family and your businesses (as applicable), it may also be necessary for us to use or provide certain personal information to third parties in the following contexts:

- To respond to customer due diligence requests from third party service providers which provide professional or financial services to the trusts or businesses we administer (including without limiting the generality of the foregoing banks, investment advisors, fund administrators, asset managers, lawyers, accountants, brokers, real estate agents and dealers in high value goods);
- To comply with requests for information from regulatory authorities, law enforcement agencies, or government officials;
- To comply with our legal obligations to exchange account and taxpayer identification information under tax information exchange agreements to which Bermuda and the Cayman Islands are party from time to time, the Common Reporting Standard (“CRS”), and the Foreign Account Tax Compliance Act (“FATCA”); and

- To such third party agents, suppliers, or contractors as are required by the Group in connection with our operations (such as IT and communications services providers, external auditors, accountants and external legal advisors which may be instructed from time to time).

Once you have received this Statement, you will be deemed to consent to the aforementioned uses of your personal information unless you notify us otherwise.

## **SECURITY AND RETENTION**

The Group has organisational measures in place to prevent the unauthorised or unlawful access to your personal information. In the event of a security breach leading to unauthorised access or disclosure of your personal information, we will inform you about the breach as soon as reasonably practicable after discovering the nature and extent of the breach.

We are obliged to hold your personal information for no less than the time periods stipulated by Bermuda and/or Cayman Islands law (as applicable) from time to time.

## **ACCESS, RECTIFICATION OF ERRORS AND DESTRUCTION OF DATA**

Subject to any legal or regulatory obligations we may have, you are entitled to ask for a copy of the personal information retained about you by the Group. In the event that the request is complex or requires significant effort or time on our part, a reasonable fee may apply to this exercise. You may make such a request by email to the Group's Data Protection Officer at [compliance@st-georges.com](mailto:compliance@st-georges.com).

We are authorized by law to refuse to disclose your personal information in the following circumstances:

- The personal information is protected by legal privilege;
- The disclosure of the personal information would reveal confidential information about the Group or about a third party that is of a commercial nature;
- The disclosure of the personal information could reasonably be expected to threaten the life or security of an individual;
- The personal information would reveal personal information about another individual; and
- The personal information would reveal the identity of an individual who has in confidence provided an opinion about another individual and the individual providing the opinion does not consent to disclosure of his identity.

You also have the right to have any inaccuracies in your personal information corrected. We encourage you to ensure that your data and contact information is kept up-to-date, as inaccurate information may impair our ability to provide the best possible trust and corporate administration services to you.

Subject to any and all laws of Bermuda or the Cayman Islands (as applicable) which require us to retain your personal information for specified purposes and/or periods of time, you may request that we destroy copies of your personal information in our possession.

## **AMENDMENTS**

The Group may amend this Statement from time to time, and any such updates will be posted to the Group's website ([www.st-georges.com](http://www.st-georges.com)). We last updated this Statement on 18<sup>th</sup> October 2018.

If you have any questions regarding the contents of this Statement, please contact the Group's Data Protection Officer by email at [compliance@st-georges.com](mailto:compliance@st-georges.com).