

Find enclosed herewith our company formation questionnaire and related documentation required to commence a business relationship with St. George's Services 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 Services 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 Services 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 obligations under Bermuda law, every prospective customer, beneficial owner or other individual who 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. 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 Services 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 or abroad, where 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.

Bermuda companies fall into two principal categories: companies incorporated by Bermudians to trade primarily in Bermuda (“local companies”) and companies incorporated by non-Bermudians for the purpose of conducting business outside of Bermuda (“exempted companies”).

The first step in the registration procedure is the reservation of a name with the Registrar of Companies (“Registrar”). Please note that it is necessary to advise the Registrar of the proposed business of the company when reserving the name. Provided we are in receipt of all relevant original documentation required to proceed with incorporation, the application to form a company is then submitted to the Bermuda Monetary Authority (the “BMA”). If there are no follow-up queries from the BMA, the process of incorporation can be accomplished on the same day application is made. Where the consent of the Minister is required however, the time needed is usually two to three working days from the date that the BMA has received all necessary information relating to the proposed company, and all personal declarations from the proposed beneficial owners.

As part of the process of incorporation of local companies (only), it will be necessary to advertise the name and objects of the Company in a local newspaper. Once the advertisement has run, we will submit an application to the BMA.

Annual government fees are payable at the same time application is made to incorporate a company and thereafter, in January (exempted companies) or March (local companies) of each year. If the fee is not paid on time, a penalty of \$300 (exempted companies) and \$150 (local companies) will be charged. If the Company is incorporated after 31st August, only half the relevant annual fee is payable. The basis for calculation of the fee is set out in our fee schedule.

An exempted company may apply to the Minister of Finance of Bermuda under the Exempted Undertakings Tax Protection Act, 1966 for an assurance that until March 2035, in the event of there being enacted in Bermuda any legislation imposing tax computed on profits or income or computed on any capital asset, gain or appreciation or any tax in the nature of estate duty or inheritance tax, then the imposition of any such tax shall not be applicable to such undertaking or to any of its operations or obligations. Such assurance will not, however, prevent the application of any such tax to persons ordinarily resident in Bermuda. There is an application fee of \$195.

1. NAME OF COMPANY

(a) The name of the Company may be reserved and, if a local company, must be advertised. The Company name must end in either “Limited” or “Ltd.”. If initials are used, please specify what they stand for. Please provide your first choice name and two alternatives:

1.	
2.	
3.	

(b) Local or Exempt

2. OBJECTS AND POWERS

In the space below, please provide a detailed explanation of the principal intended business of the Company (for example real estate holding for real estate in Bermuda/overseas (include geography), ship/aircraft ownership for ship/aircraft ownership in Bermuda or overseas, investment holding for marketable securities or private equity investments, consultancy services in a particular industry, etc). A brief business plan is preferred, if available.

Please note that there are specific requirements in the case of the incorporation of certain types of companies, including among others, companies incorporated to offer investment advice and professional services. If it is intended to incorporate any such company, please provide a resumé for each principal, speaking to his or her expertise in the relevant area.

3. 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 Manhattan, etc. 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:

(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:

4. 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:	

5. SHARE CAPITAL

Companies limited by shares are no longer required to maintain a minimum share capital.

- (a) State the amount and currency of the Company's share capital. Most companies in Bermuda are incorporated with \$12,000 of share capital, denominated in either USD or BMD.

- (b) Under Bermuda law, shares of no par value are not permitted. It is most common to issue shares of par value \$1.00 each. State the par value of shares of the Company's shares:

- (c) There is no legal requirement as to the minimum percentage of the call on share capital. State the percentage call on the Company's capital:

6. REGISTERED OFFICE IN BERMUDA (if other than 27 Reid Street, Hamilton HM 11, Bermuda):

7. NAME AND ADDRESS OF SECRETARY (if other than St. George's Services Limited):

8. DATE OF COMMENCEMENT

State when the Company would wish to commence its business and if the commencement date is critical, state why:

--

9. OWNERSHIP AND ORGANISATION OF THE COMPANY

Bermuda Government policy requires full disclosure of the ultimate beneficial ownership of a Bermuda company. This information will be held in the strictest confidence by the Minister of Finance and all public officers having access thereto.

Where the ultimate beneficial owner of the proposed company is an individual, he or she must complete the enclosed *Declaration Regarding Source of Funds & Solvency*, *Personal Information* form and *Personal Declaration*, all of which form part of this Questionnaire.

Where the ultimate beneficial owner is a private company, each shareholder of that private company must complete the enclosed *Declaration Regarding Source of Funds & Solvency (if applicable)*, *Personal Information* form and *Personal Declaration*. In addition, the latest financial statements (if any) of the company should also be provided. Where one or more intermediate companies are involved, this information will be required for the direct owner and the ultimate beneficial owner(s) only.

Please note that the owner of an existing company in Bermuda may be required to produce updated information if the existing company was formed more than three years prior to this application.

Where the ultimate beneficial owner is a public company, quoted on a recognized stock exchange, it will be necessary to specify the name, registered office address of the company and the stock exchange(s) on which it is listed.

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, and a *Declaration Regarding Source of Funds & Solvency (if applicable)*, *Personal Information* form and *Personal Declaration* for the settlor and each adult beneficiary in whose main interest the trust operates. If the Trust has a protector, he or she must also provide a *Personal Information* form.

Where the ultimate beneficial owner is a partnership, it will be necessary to provide a *Declaration Regarding Source of Funds & Solvency (if applicable)*, *Personal Information* form and *Personal Declaration* for each of the general and limited partners and the most recent financial statements of the partnership.

Under Bermuda law, bearer shares are not permitted. The share register of a company is open for inspection by the public, upon request.

(a) Allotment of share capital:

Name:	Address:	Number of shares:	Shares to be registered in own name or to nominee?

--	--	--	--

(b) If issued, who will have custody of the share certificates?

--

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

(i) If so, in what amount?

--

(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?

--

(d) Provide the names of directors and alternate directors (if any) and their respective offices. Every company must have a President and Vice-President or Chairman and Deputy Chairman. An exempted company must have a minimum of one director, secretary or “resident representative” who is ordinarily resident in Bermuda. A resident representative must be an individual or company ordinarily resident in Bermuda, who will be entitled to receive notice of, attend and be heard at and receive copies of all minutes of all meetings of the directors and members and any committees thereof. The resident representative will act as agent for service of process in Bermuda if there is no director or secretary resident in Bermuda.

A **Personal Information Form** (enclosed) **Personal Declaration** (enclosed) should be attached for each intended Director and Officer, together with the Know Your Client documentation requested therein.

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

(e) Central contact numbers for the purpose of giving notice of directors and members meetings:

(i) Members meetings:

Contact person:	
Telephone:	
Fax:	

(ii) Directors meetings:

Contact person:	
Telephone:	
Fax:	

(f) Will the Company establish a business office in Bermuda? Yes No

If so, what will be the staff requirements for the first year (if known)?

--

(g) Name and address of accountant, who will maintain the Company's financial records:

--

(h) A Bermuda company must keep proper records of account with respect to its business activities. These records must be kept at the registered office or at such other place as the directors think fit.

The records are required to be available for inspection by the directors at any time. When the books of account are kept outside of Bermuda, the Company must maintain sufficient records in Bermuda as will enable the directors to ascertain with reasonable accuracy the financial position of the Company at the end of each quarter.

If the financial records are not proposed to be kept at the registered office, please provide the address at which such records will be kept:

--

The directors are required to present to the members of the Company in general meeting in each year financial statements for the relevant financial period, prepared in accordance with generally accepted accounting principles, together with an auditor's report thereon. The presentation of financial statements and audited accounts may be waived provided that all the members and directors agree.

Name of auditor, if one is to be appointed. Otherwise, please state preference for waiver:

--

(i) Date of termination of financial year:

--

(j) First accounting period will end on:

--

(k) Bye-laws

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

--

(l) To whom should we look on a continuing basis for instructions and settlement of our fees?

Name:	
Address:	
Contact numbers:	

Client Signature

Dated this ____ day of _____, 20 ____



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.

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 ____



Personal Declaration Form for Directors/Officers

(For this form, Directors/Officers shall have the meaning set out in the relevant 'Regulatory Acts' defined on page five)

A separate declaration must be completed and signed by each individual proposing to be a director or an officer of a regulated financial services entity.

All forms must be completed digitally. Handwritten submissions will not be accepted.

Bermuda Entity Details

Name of Bermuda entity in connection with which this declaration is being completed:	
Proposed role within the Bermuda entity:	

Employment Details

If retired or unemployed, please specify and include details of your last employer and role.

Present employer:	
Job title and occupation:	

I am attaching my resume which outlines my current employment and work history, unless I have indicated retirement or unemployment.

Personal Information

Surname:			
Complete forename(s):	<i>As appears on your Government-issued ID or Passport</i>		
Name generally used:			
Any other or previous name(s):	<i>Include any pseudonyms and/or name change details (to and from) and place of change</i>		
Date of birth:			Gender:
Place of birth:	City:	Country:	
Current residential address: P.O. Box <u>not</u> acceptable			
Previous residential addresses: Past three (3) years	<i>Please refer to page two to add additional information</i>		

Country of citizenship	<i>If more than one citizenship is held please list all</i>
Previous citizenship(s):	<i>List all, and provide date of renunciation for each</i>

Passport details

If you hold multiple passports, please list details for all of them (use the Additional Information box, if needed).

Passport number:	Issue date:	Expiry date:
Place of issue:	Country of issue:	

Passport number:	Issue date:	Expiry date:
Place of issue:	Country of issue:	

Additional Information

Declaration

If the answer is yes to any of the following questions, please provide details in the corresponding information box.

1	<p>Do you have any interest (as a director and/or officer or as the direct or indirect holder of 10% or greater of the voting or economic interests) in any legal entity formed in Bermuda? If yes, provide details.</p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>
2	<p>Have you ever been refused consent to register a legal entity in Bermuda and/or any other country? If yes, provide details.</p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>
3	<p>Are any bankruptcy and/or similar proceedings pending against you? If yes, what is the status?</p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>

4	<p>Have you (or any legal entity in which you hold/held a directorship and/or officer position; or any legal entity in which you hold/held directly or indirectly voting or economic interests greater than 10%) been the subject of any criminal/civil investigations and/or proceedings and/or litigation? If yes, provide details including the outcome of the proceedings.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>
<div style="border: 1px solid black; height: 50px;"></div>		
5	<p>Have you (or any legal entity in which you hold/held a directorship and/or officer position; or any legal entity in which you hold/held directly or indirectly voting or economic interests greater than 10%) been found in breach of regulations or convicted of any offence, criminal or otherwise, by any tribunal or court (including convictions under appeal, any formal notification of investigation or committal for trial)? If yes, provide details including the outcome of the proceedings.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>
<div style="border: 1px solid black; height: 60px;"></div>		
6	<p>Have you (or any legal entity in which you hold/held a directorship and/or officer position; or any legal entity in which you hold/held directly or indirectly voting or economic interests greater than 10%) ever been the subject of a judicial or another official enquiry/fraud investigation? Has dishonesty been proven against you in any civil proceedings? If yes, provide details including the outcome of the proceedings.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>
<div style="border: 1px solid black; height: 50px;"></div>		
7	<p>Have you (or any legal entity in which you hold/held a directorship and/or officer position; or any legal entity in which you hold/held directly or indirectly voting or economic interests greater than 10%) ever:</p>	
<p>7a. Been the subject to an investigation (whether current or previous). If yes, please provide details including outcome of the proceedings.</p>		<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>
<div style="border: 1px solid black; height: 37px;"></div>		
<p>7b. Are you aware of any action that might be taken against you (or any legal entity in which you hold/held a directorship position; or any legal entity in which you hold/held directly or indirectly voting or economic interests greater than 10%) by a governmental body, public authority, professional or other regulatory body. If yes, provide details.</p>		<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>
<div style="border: 1px solid black; height: 37px;"></div>		
<p>7c. Resigned a directorship position whilst under investigation? If yes, provide details.</p>		<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>
<div style="border: 1px solid black; height: 37px;"></div>		
8	<p>Are you a member in good standing of a self-regulatory organisation(s) and/or professional body? If yes, name the organisation(s) and/or professional body.</p>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>
<div style="border: 1px solid black; height: 50px;"></div>		

<p>8a. Have you ever been censured or disqualified by a professional body? If yes, provide details.</p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>
<p>8b. Have you ever been the subject of an investigation, pending proceeding or other enquiry by a self-regulatory organisation or professional body of which you are or were a member? If yes, provide details including the outcome of the proceedings.</p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>
<p>9 Have you (or any legal entity in which you hold/held a directorship and/or officer position; or any legal entity in which you hold/ held directly or indirectly voting or economic interests greater than 10%) ever been refused or had a licence, permit or other authorisation revoked? Have you ever had regulatory action taken against you in any jurisdiction, or have you been fined or subject to enforcement actions imposed by a regulator? If yes, provide details including the outcome of the proceedings.</p> <div style="border: 1px solid black; height: 40px; width: 100%;"></div>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>

Politically Exposed Person (“PEP”)

Politically Exposed Person has the meaning assigned to it in regulation 11(5) of the Proceeds of Crime (Anti-Money Laundering and Anti-Terrorist Financing) Regulations 2008 (the “Regulations”).

“Immediate family member” has the meaning given in paragraph 2 of the Schedule to the Regulations.

<p>10 Have you or an “immediate family member” or a close associate, ever been a PEP? If yes, provide details below.</p> <p>10a. If a PEP, please select the appropriate PEP category from the drop-down list below:</p> <p>10b. If a PEP, please specify your role that classified you as a PEP:</p> <div style="border: 1px solid black; height: 20px; width: 100%;"></div> <p>10c. If a family member or a close associate of a PEP, please specify the family relationship and/or the nature of the association:</p> <div style="border: 1px solid black; height: 20px; width: 100%;"></div>	<p>Yes <input type="checkbox"/> No <input type="checkbox"/></p>
---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	-----------------------------------------------------------------

I hereby confirm that I will inform the Bermuda Monetary Authority of any change in my PEP status as detailed in this Form. **(Required)**

11 Other Relevant Matters

Yes No

Are there any additional matters not covered in the previous questions that may be relevant to the Bermuda Monetary Authority's assessment of your fitness and propriety? This includes, but is not limited to, any circumstances or conduct that could reasonably be considered to affect your suitability to perform your proposed role. If yes, please provide full details below.

Signature

I hereby certify that the information in, and the Documentation provided with this Declaration are true, accurate and complete to the best of my knowledge and belief.

Signature: _____ Dated: _____

'Regulatory Acts' mean the Insurance Act 1978 and Investment Funds Act 2006.

Personal Declaration Form for Beneficial Owners/Shareholder Controllers

(For the purpose of this form “beneficial owners” shall have the meaning set out in the Companies Act 1981 or Exchange Control Regulations 1973, the Partnership Act 1902 and Limited Liability Company Act 2016 and “shareholder controllers” the meaning set out in the relevant “Regulatory Act” defined below).

A separate declaration form must be completed and signed by each person proposing to be a beneficial owner or shareholder controller in a Bermuda entity. For Partnerships, the beneficial owner and/or the General Partner (if a natural person) must complete the declaration form. For Trusts, the Settlor, Protector, Beneficiary, Trustee or any other natural person exercising control over the Trust must complete the declaration Form.

Personal information

Surname:		
Complete forename(s):		<i>As appears on Government Issued ID or Passport</i>
Name generally used:		
Any previous name(s):		<i>If relevant, please provide name change from and to, include place of change</i>
Date of birth: <small>(DD/MM/YY)</small>		Gender:
Place of birth:	City:	Country:
Current residential address: <i>P.O. Box <u>not</u> acceptable</i>		
Previous residential addresses: Past three (3) years		
Country of citizenship:		<i>If more than one citizenship is held please list all</i>
Previous citizenship(s):		<i>List all, and provide date of renunciation for each</i>

Employment details

If retired please provide details of your last occupation.

Present employer:	
Occupation:	

Passport details

If you have multiple passports, please list details for all of them (use the Additional Information box, if needed).

Passport number:	Issue date: <small>(DD/MMM/YYYY)</small>	Expiry date: <small>(DD/MMM/YYYY)</small>
Place of issue:	Country of issue:	
Passport number:	Issue date: <small>(DD/MMM/YYYY)</small>	Expiry date: <small>(DD/MMM/YYYY)</small>
Place of issue:	Country of issue:	

Information about spouse or partner

Name of spouse/partner:		
Date of birth:	(DD/MM/YY)	Country of citizenship:
Place of birth:	City:	Country:
Address of spouse/partner:		
P.O. Box <i>not</i> acceptable		

Declaration

If the answer is yes to any of the following questions, please provide details in the additional information box below.

1	Do you have any interest in any company or partnership registered or formed in Bermuda?	Yes	No
2	Have you ever been refused consent to register a company or form a partnership in Bermuda or elsewhere?	Yes	No
3	Are you or have you ever been an undischarged bankrupt?	Yes	No
4	Are or have you (or a company in which you hold/held an interest) at any time been the subject of any criminal/civil investigations and/or proceedings and/or litigation?	Yes	No
5	Have you (or a company in which you hold/held an interest) at any time been found in breach of regulations or convicted of any offence, criminal or otherwise, by any Tribunal or court (including convictions under appeal, any formal notification of investigation or committal for trial)?	Yes	No
6	Have you (or a company in which you hold/held an interest) ever been the subject of a judicial or another official enquiry/investigation for fraud or dishonesty or has fraud or dishonesty been proven against you in any civil proceedings?	Yes	No
7	Have you (or a company in which you hold/held an interest) ever been subject to an investigation (whether current or previous) or are you aware of any action that might be taken against you (or a company in which you hold/held an interest) by a governmental body, public authority, professional or other regulatory body or have you ever resigned a professional post whilst under investigation?	Yes	No
8	Are you a member in good standing of a self-regulatory organisation(s) or professional body? If yes, name the organisation(s) or professional body:	Yes	No
	8a. Have you ever been censured or disqualified by a professional body?	Yes	No
	8b. Have you ever been the subject of an investigation, pending proceeding or other enquiry by a self-regulatory organization or professional body of which you are or were a member?	Yes	No
9	Have you (or a company in which you hold/held an interest) ever been refused or had a licence, permit or other authorisation revoked or regulatory action taken against you in any jurisdiction or have you been fined or subject to enforcement actions imposed by a regulator? 9a. If yes, name the organisation(s), provide dates and relevant facts including decisions.	Yes	No

Politically Exposed Person (“PEP”)

Politically Exposed Person has the meaning assigned to it in regulation 11(5) of the Proceeds of Crime (Anti-Money Laundering and Anti-Terrorist Financing) Regulations 2008 (the “Regulations”).

“Immediate family member” has the meaning given in paragraph 2 of the Schedule to the Regulations.

10	<p>Have you or an “immediate family member” or a close associate, ever been a PEP?</p> <p>10a. If yes, please provide details by selecting the appropriate PEP category:</p> <p>10b. If a PEP, please specify your role that classified you as a PEP:</p> <p>10c. If a family member or a close associate of a PEP, please specify the family relationship and/or the nature of the association:</p>	<p>Yes No</p>
-----------	---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	------------------

Signature

I hereby certify that the information in this Declaration is true, accurate and complete to the best of my knowledge and belief.

Signature: _____ Dated: _____
(DD/MM/YY)

Corporate Services Provider to complete
(Authorised representative of Corporate Services Provider)

Due to the individual’s PEP (or former PEP) status, we confirm that the we have conducted enhanced due diligence, during which we have satisfied ourselves concerning their source of wealth.

Corporate Service Provider: _____

Authorised Representative’s Name: _____

Signature: _____ Dated: _____
(DD/MM/YY)

Additional information: (If the information exceeds the word limit of this box, please add an additional page as needed)

Note: A completed Personal Declaration remains valid for three (3) years from the date it is signed.

“Regulatory Acts” mean the Insurance Act 1978, Banks and Deposit Companies Act 1999, the Trusts (Regulation of Trust Business) Act 2001, Investment Business Act 2003, Investment Funds Act 2006, Money Services Business Act 2016, Digital Asset Business Act 2018, Fund Administration Business Provider Act 2019 and Digital Asset Issuance Act 2019.

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? If yes , please provide details. If not please state: No	

<p>- Have you ever held or currently hold a prominent function in an international or Government controlled organisation? If yes, please provide details. If not please state: No</p> <p>- Are you a family member or associate of such a person? If yes, please provide details. If not please state: No</p>	
<p>Have you ever been the subject of an international sanction? If yes, please provide details. If not please state: No</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 residency 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 (<i>dd / mm / yyyy</i>)	Place & Country of Birth
------	--------------------------------------------	--------------------------

Permanent Residence Address:

Number & Street	City/Town
-----------------	-----------

State/Province/County	Post Code	Country
-----------------------	-----------	---------

Mailing address (if different from above):

Number & Street	City/Town
-----------------	-----------

State/Province/County	Post Code	Country
-----------------------	-----------	---------

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.

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). We last updated this Statement on 18th 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.