

UBO DECLARATION TEMPLATE

COMPANY DETAILS

Name of the company	
Identification number of the company	

CONFIRMATION OF INVESTMENT ON BEHALF OF 3rd PARTY

Please tick one of the below boxes.

- We confirm that we are investing on our own behalf and we are ultimate beneficial owner of the funds
- We confirm that we are acting as an intermediary and will hold units on behalf of underlying investors

CONFIRMATION REGARDING OWNERSHIP / CONTROL

The representatives of the company make the following declarations of the ownership of the company, which are true to the best of their knowledge.

Please tick one of the below boxes and complete the relevant following sections.

Please note that sections 1, 2, 3 and 4 are not alternative options but cascading measures as described below:

- Complete section 1 if applicable;
 - ↳ if section 1 is not applicable, complete sections 2 and 3;
 - ↳ if sections 1, 2 and 3 are answered “no”, section 4 must be only completed.

SECTION 1: Listed Company

We confirm that the investing entity is a company whose shares are admitted for trading on a Regulated Market (This does not apply to subsidiaries, including wholly owned).

- No
- Yes, please provide further detail below.

Country in which the entity is traded:	
Full name of the regulated market:	

SECTION 2: Control by Ownership

We confirm there is a natural person(s) who ultimately owns or controls (directly or indirectly) equal or greater than 25%¹ of the value of the shares, voting rights or ownership in the investing entity, including through bearer shares.

No

Yes, please complete table below with the ownership detailed and provide a copy of a valid passport or government ID for the individual(s) named below

First Name(s)	Last Name	Date of birth (dd/mm/yyyy)	Place of birth	Nationality(ies)	Address (country of current residency or company address; PO or C/O will not be accepted)	Identification Document Number	Country of issue	Position in the company ³ (where appropriate)	PEP ² details (where appropriate)	Percentage of Ownership ³ (where appropriate)

If needed, please add further line to cover all ultimate beneficial owners

¹ The threshold might be 10% depending of the jurisdiction and/or the risk rating of the company.

² A current or former natural entrusted with prominent public functions, including, but not limited to, heads of states, senior politicians, government or military officials or senior executives of state-owned entities. This includes a relative of such a person including spouse/partner, children, their spouses/partners and siblings of that person as well as any close personal or business associate.

³ These information are required to document the nature and scope of the effective interest held.

SECTION 3: Control by Other means

We confirm there is a natural person(s) who control(s) the investing entity by other means.

- No
- Yes, please complete table below with the ownership detailed and provide a copy of a valid passport or government ID for the individual(s) named below

First Name(s)	Last Name	Date of birth (dd/mm/yyyy)	Place of birth	Nationality(ies)	Address (country of current residency or company address; PO or C/O will not be accepted)	Identification Document Number	Country of issue	Position in the company ³ (where appropriate)	PEP ² details (where appropriate)	Percentage of Ownership ³ (where appropriate)

If needed, please add further line to cover all ultimate beneficial owners

² A current or former natural entrusted with prominent public functions, including, but not limited to, heads of states, senior politicians, government or military officials or senior executives of state-owned entities. This includes a relative of such a person including spouse/partner, children, their spouses/partners and siblings of that person as well as any close personal or business associate.

³ These information are required to document the nature and scope of the effective interest held.

SECTION 4: Control Senior Managing Official (SMO)

Section 4 must only be completed if sections 1, 2 and 3 are answered “no” and consequently we confirm there is no natural person(s) who ultimately owns or controls (directly or indirectly) equal or greater than 25%¹ of the value of the shares, voting rights or ownership in the investing entity, including through bearer shares or through control by other means.

- No
- Yes, please complete the table below with the Senior Managing Official(s)

Given the sections 1, 2 or 3 above do not apply, the Senior Managing Official(s) needs to be recorded as the “Ultimate Beneficial Owner-Senior Managing Official” (SMO), as defined in Directive (EU) 2015/849. SMO means any natural person(s) exercising executive control over the daily and regular business of the entity through a senior management position, such as Director, Chief Executive Officer (CEO), Chief Financial Officer (CFO), Managing or Executive Director, President or Chairman⁴.

First Name(s)	Last Name	Date of birth (dd/mm/yyyy)	Place of birth	Nationality(ies)	Address (country of current residency or company address; PO or C/O will not be accepted)	Identification Document Number (where appropriate)	Country of issue	Position in the company ³ (where appropriate)	PEP ² details (where appropriate)	Percentage of Ownership ³ (where appropriate)

If needed, please add further line to cover all ultimate beneficial owners

¹ The threshold might be 10% depending of the jurisdiction and/or the risk rating of the company.

² A current or former natural entrusted with prominent public functions, including, but not limited to, heads of states, senior politicians, government or military officials or senior executives of state-owned entities. This includes a relative of such a person including spouse/partner, children, their spouses/partners and siblings of that person as well as any close personal or business associate.

³ These information are required to document the nature and scope of the effective interest held.

⁴ If your company is subject to a national Beneficial Owner Register, the above table must correspond with the data filed in the national Beneficial Owner Register.

IDENTIFICATION OF THE CHAIN OF OWNERSHIP (optional)

We attach an Organisation Chart dated and signed by valid representatives of the company showing the link between the entity and its beneficial owner(s). The chart includes name, address, registration number and percentage of ownership of all the intermediate entities placed between the company and its beneficial owners.

UBO REGISTER

The UBO register shall be collected for company located in any of the EU Member States and which are in scope of the obligation to declare a beneficial owner. Please select the appropriated option depending on the accessibility to the UBO register

- the UBO register does not exist as the countries of registration of the company have not implemented the BO register infrastructure locally
- the UBO register is free and publicly available
- the UBO register is not free or publicly available. If ticked, please provide a copy of the UBO register

DECLARATIONS

We confirm that the information provided are accurate and up to date.

We commit to notify any subsequent change of Ultimate Beneficial Ownership without any delay.

Further, we understand that your company reserve the right to request further documentation, if needed to comply with applicable anti-money laundering laws and regulations.

Name & title:

Date:

Signature:

Name & title:

Date:

Signature:

To be signed in accordance with Authorised Signatory list

DEFINITION

In accordance with article 1(7) of the Luxembourg AML Law of 12 November 2004 as amended, a beneficial owner shall mean any natural person(s) who ultimately owns or controls the customer or any natural person(s) on whose behalf a transaction or activity is being conducted. The concept of beneficial owner shall include at least:

(a) in the case of corporate entities:

- (i) any natural person who ultimately owns or controls a legal entity through direct or indirect ownership of a sufficient percentage of the shares or voting rights or ownership interest in that entity, including through bearer shareholdings, or through control via other means, other than a company listed on a regulated market that is subject to disclosure requirements consistent with European Union law or subject to equivalent international standards which ensure adequate transparency of ownership information. This may be the case even if the threshold of the participation or control as indicated hereafter is not met.
A shareholding of 25% plus one share or an ownership interest of more than 25% in the customer held by a natural person shall be an indication of direct ownership. A shareholding of 25% plus one share or an ownership interest of more than 25% 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;
- (ii) if, after having exhausted all possible means and provided there are no grounds for suspicion, no person under point (i) is identified, or if there is any doubt that the person(s) identified are the beneficial owner(s), any natural person who holds the position of senior managing official.

“Control through other means” may be determined in accordance with Articles 1711-1 to 1711-3 of the Law of 10 August 1915 on commercial companies, as amended, as well as in accordance with the following criteria:

- (aa) the direct or indirect right to exercise a dominant influence over a customer, on the basis of a contract entered into with that customer or of a clause of the articles of association of that customer, where the law governing that customer allows being subject to such contracts or such statutory clauses;
- (bb) the fact that a majority of the members of the administrative, management or supervisory bodies of the customer, in office during the financial year as well as the preceding financial year and until the preparation of the consolidated financial statements, were appointed through direct or indirect exercise of the voting rights of one natural person;
- (cc) the direct or indirect power to exercise or the actual direct or indirect exercise of a dominant influence or control over the customer, including the fact that the customer is placed under a single management with another undertaking;
- (dd) an obligation, under the national law to which the parent undertaking of the customer is subject, to prepare consolidated financial statements and a consolidated management report;

(b) in the case of fiducies and trusts, all following persons:

- (i) the “settlor(s)”;
- (ii) “the *fiduciaire(s)* or trustee(s)”;
- (iii) the “protector(s)”, if any;
- (iv) the beneficiaries, or where the individuals benefiting from the legal arrangement or entity have yet to be determined, the class of persons in whose main interest the legal arrangement or entity is set up or operates;
- (v) any other natural person exercising ultimate control over the *fiducie* or trust by means of direct or indirect ownership or by other means;

(c) in the case of legal entities such as foundations, and legal arrangements similar to trusts, any natural person holding equivalent or similar positions to those referred to in point (b).