

Instruction page for completion of International tax classification for an entity

The International tax classification for an entity (4545-E) form should only be completed where the Account Holder is an Entity (a corporation, trust, partnership, association or other organization).

Account Holder means the owner of the financial account maintained or to be maintained by Sun Life Financial group of companies. It doesn't matter whether the Account Holder flows all its income from the financial account through to another person or Entity for taxation in that person's or Entity's hands. But a person or Entity, other than a Financial Institution, who owns a financial account for the benefit or account of another person or Entity as agent, custodian, nominee, signatory, investment advisor, or intermediary, is not treated as the Account Holder under Parts XVIII or XIX of the Income Tax Act (Canada). Instead, the person or Entity for whose benefit the financial account is owned is treated as the Account Holder. Under Part XVIII, the term "Financial Institution" does not include a Financial Institution organized or incorporated in a U.S. Territory. In the case of a cash value insurance contract or an annuity contract, the Account Holder is any person or Entity entitled to access the cash value or change the beneficiary of the contract. If no one can access the cash value or change the beneficiary, the Account Holder is any person or Entity named as the owner in the contract, and any person or Entity with a vested entitlement to payment under the terms of the contract (including a collateral assignee). Upon the maturity of a cash value insurance contract or an annuity contract, each person or Entity entitled to receive a payment under the contract is treated as an Account Holder. With respect to a jointly held or co-owned account, each joint holder or co-owner is treated as an Account Holder.

Definitions in this document are provided for general information only. For terms not defined in this document, refer to the Income Tax Act (Canada). For any questions about the "International tax classification for an entity form (4545-E)", the meaning and application of any terms and definitions or the consequences of not providing information, seek independent legal or tax advice. Nothing in these instructions should be taken as legal or tax advice.

1 Declaration of tax residency

Tax residency/Tax residence

Residence for tax purposes. An Entity will be a tax resident in a jurisdiction if under the laws of the jurisdiction (including applicable tax treaties) the Entity pays or should be paying tax, or for a fiscally transparent Entity (e.g. partnerships, flow-through entities, and certain disregarded entities), files or should be filing a tax return by reason of:

- a) Country of domicile (home for legal purposes, registered or permanent address);
- b) Country of incorporation, organization or formation;
- c) Country of business activity (place it conducts or carries on business);
- d) Country of Permanent Establishment (tax treaty PE);
- e) Country of effective management (principal office/place where key or central management decisions are made or control is exercised);
- f) Other criterion that applies under the laws of the applicable jurisdiction(s).

Instructions: Please complete the table indicating where the Entity is a tax resident based on the residence criteria and the taxpayer identification number (TIN) for each jurisdiction where the Entity is a tax resident.

If the Account Holder Entity is a tax resident in more jurisdictions, complete an additional 4545-E form.

If an Entity is not a tax resident in any jurisdiction because the Entity is fiscally transparent, such as a partnership, limited liability partnership or similar legal arrangement, please provide the Entity's place of effective management or country in which its principal office is located as its jurisdiction of residency. A trust is generally treated as resident where one or more of its trustees is resident or where its central management and control is located (i.e. where the people who control the trust reside for tax purposes).

An Entity may be deemed a resident in more than one jurisdiction based on each jurisdiction's tax residency rules. In certain circumstances, an Entity may be able to apply the tiebreaker rules contained in a tax treaty applicable to the Entity in order to resolve questions of multiple tax residences.

1 Declaration of tax residency (continued)

FATCA

U.S. Code means the U.S. Internal Revenue Code.

U.S. Person means a U.S. citizen or resident individual or their estate, a partnership or corporation organized in the United States or under the laws of the United States or any State thereof, or a trust if:

- i) a court within the United States would have authority under applicable law to render orders or judgments concerning substantially all issues regarding administration of the trust, and
- ii) one or more U.S. persons have the authority to control all substantial decisions of the trust, or an estate of a decedent that is a citizen or resident of the United States. These terms should be interpreted in accordance with the U.S. Internal Revenue Code and applicable U.S. Treasury Regulations.

Specified U.S Person means a U.S. Person, other than:

- i) a corporation the stock of which is regularly traded on one or more established securities markets;
- ii) any corporation that is a member of the same expanded affiliated group, as defined in section 1471(e)(2) of the U.S. Code, as a corporation described in clause (i);
- iii) the United States or any wholly owned agency or instrumentality thereof;
- iv) any State of the United States, any U.S. Territory, any political subdivision of any of the foregoing, or any wholly owned agency or instrumentality of any one or more of the foregoing;
- v) any organisation exempt from taxation under section 501(a) of the U.S. Code or an individual retirement plan as defined in section 7701(a)(37) of the U.S. Code;
- vi) any bank as defined in section 581 of the U.S. Code;
- vii) any real estate investment trust as defined in section 856 of the U.S. Code;
- viii) any regulated investment company as defined in section 851 of the U.S. Code or any entity registered with the U.S. Securities and Exchange Commission under the U.S. Investment Company Act of 1940;
- ix) any common trust fund as defined in section 584(a) of the U.S. Code;
- x) any trust that is exempt from tax under section 664(c) of the U.S. Code or that is described in section 4947(a)(1) of the U.S. Code;
- xi) a dealer in securities, commodities, or derivative financial instruments (including notional principal contracts, futures, forwards, and options) that is registered as such under the laws of the United States or any State;
- xii) a broker as defined in section 6045(c) of the U.S. Code, or any tax-exempt trust under a plan that is described in section 403(b) or section 457(b) of the U.S. Code.

U.S. Territory means American Samoa, the Commonwealth of the Northern Mariana Islands, Guam, the Commonwealth of Puerto Rico, or the U.S. Virgin Islands.

TIN means the Entity or individual's Taxpayer Identification Number (or functional equivalent in the absence of a taxpayer identification number).

CRS

Reportable Jurisdiction means a jurisdiction other than Canada and the United States of America that has an agreement in place to provide the financial account information required under the "International tax classification for an entity (4545-E)" form.

Reportable Jurisdiction Person means an Entity that is a tax resident in a Reportable Jurisdiction(s) under the tax laws of that jurisdiction. Often, an entity is a tax resident of the jurisdiction where it is established or incorporated, or where its effective management and control is located (which generally means the jurisdiction where its Controlling Persons reside for tax purposes). If an Entity certifies that it has no residence for tax purposes it should complete the form stating the address of its principal office, or the addresses of its Controlling Persons. Dual resident Entities may rely on the tiebreaker rules contained in tax conventions (if applicable) to determine their residence for tax purposes.

Reportable Person means a "Reportable Jurisdiction Person," other than:

- i) a corporation the stock of which is regularly traded on one or more established securities markets;
- ii) any corporation that is a Related Entity of a corporation described in clause (i);
- iii) a Governmental Entity;
- iv) an International Organization;
- v) a Central Bank; or
- vi) a Financial Institution.

TIN means the Entity or individual's Taxpayer Identification Number (or functional equivalent in the absence of a taxpayer identification number).

Related Entity An entity is related to another entity if one entity controls the other or the two entities are under common control (the "related entity group"). Control means direct or indirect ownership of:

- in the case of a corporation, more than 50% of the vote and value in an entity;
- in the case of a partnership, interest as a member of the partnership that entitles the member to more than 50% of the income or loss of the partnership, or of the assets (net of liabilities) if the partnership were to cease to exist; and
- in the case of a trust, an interest as a beneficiary with a fair market value that is greater than 50% of the fair market value of all interests as a beneficiary under the trust.

FATCA

Non-Financial Foreign Entity (NFFE) means any Non-U.S. Entity that is not a Foreign Financial Institution as defined in relevant U.S. Treasury Regulations, or an Entity that meets the requirements described in ix) below in the definition of “Active NFFE”. An “NFFE” also includes any Non-U.S. Entity that is resident in Canada or another Partner Jurisdiction, and that is not a Financial Institution.

Non-U.S. Entity means an Entity that is not a U.S. Person.

Active Non-Financial Foreign Entity (Active NFFE) means an Active NFFE that meets any one of the following criteria:

- i) Less than 50 per cent of its gross income for the preceding calendar year or other appropriate reporting period is Passive Income and less than 50 per cent of its assets held during the preceding calendar year or other appropriate reporting period are assets that produce or are held for the production of Passive Income;
- ii) The NFFE’s stock is regularly traded on an established securities market, or the NFFE is a Related Entity of an Entity the stock of which is traded on an established securities market;
- iii) The NFFE is organised in a US Territory, and all its owners are bona fide residents of that US Territory;
- iv) The NFFE is a government (other than the US government), a subdivision of such government (including a province, state, county, or municipality of such government), or a public body performing a function of such government or political subdivision of that government, a government of a US Territory, an international organisation, a non-US central bank of issue, or an Entity wholly owned by one or more of the foregoing;
- v) All or substantially all of the activities of the NFFE consist of holding (in whole or in part) the outstanding stock of, and providing financing and services to, one or more subsidiaries that engage in trades or businesses other than the business of a Financial Institution, unless the NFFE functions (or holds itself out) as an investment fund, such as a private equity fund, venture capital fund, leveraged buyout fund or any investment vehicle whose purpose is to acquire or fund companies and then hold interests in those companies as capital assets for investment purposes;
- vi) The NFFE is not yet operating a business and has no prior operating history, but is investing capital into assets with the intent to operate a business other than that of a Financial Institution; provided, that the NFFE does not qualify for this exception after 24 months from the date of the initial organization of the NFFE;
- vii) The NFFE was not a Financial Institution in the past five years, and is in the process of liquidating its assets or is reorganising with the intent to continue or recommence operations in a business other than that of a Financial Institution;
- viii) The NFFE primarily engages in financing and hedging transactions with or for Related Entities that are not Financial Institutions, and does not provide financing or hedging services to any Entity that is not a Related Entity, provided that the group of any such Related Entities is primarily engaged in a business other than that of a Financial Institution; or
- ix) The NFFE meets all of the following requirements:
 - a) It is established and maintained in its country of residence exclusively for religious, charitable, scientific, artistic, cultural, or educational purposes;
 - b) It is exempt from income tax in its country of residence;
 - c) It has no shareholders or members who have a proprietary or beneficial interest in its income or assets;
 - d) The applicable laws of the Entity’s country of residence or the Entity’s formation documents do not permit any income or assets of the Entity to be distributed to, or applied for the benefit of, a private person or non-charitable Entity other than pursuant to the conduct of the Entity’s charitable activities, or as payment of reasonable compensation for services rendered, or as payment representing the fair market value of property which the Entity has purchased; and
 - e) The applicable laws of the Entity’s country of residence or the Entity’s formation documents require that, upon the Entity’s liquidation or dissolution, all of its assets be distributed to a governmental Entity or other non-profit organization, or escheat to the government of the Entity’s country of residence or any political subdivision thereof.

Related Entity An entity is related to another entity if one entity controls the other or the two entities are under common control (the “related entity group”). Control means direct or indirect ownership of:

- in the case of a corporation, more than 50% of the vote and value in an entity. The reference to “vote and value” is taken from the U.S. Treasury Regulations as allowed by paragraph 7 of Article 4 of the Intergovernmental Agreement between the United States and Canada implementing FATCA (Intergovernmental Agreement);
- in the case of a partnership, interest as a member of the partnership that entitles the member to more than 50% of the income or loss of the partnership, or of the assets (net of liabilities) if the partnership were to cease to exist; and
- in the case of a trust, an interest as a beneficiary with a fair market value that is greater than 50% of the fair market value of all interests as a beneficiary under the trust.

Passive Non-Financial Foreign Entity (Passive NFFE) means any NFFE that is not

- i) an Active NFFE or
- ii) a withholding foreign partnership or withholding foreign trust, pursuant to relevant U.S. Treasury Regulations.

2 Certification of Non-financial foreign entity (NFFE) and Non-financial entity (NFE) (continued)

Direct Reporting NFFE means a NFFE that elects to report information about its direct or indirect substantial U.S. owners to the IRS, has a Global Intermediary Identification Number (GIIN) and meets certain requirements as defined in U.S. Treasury Regulation section 1.1472-1(c)(3).

Passive Income means the portion of gross income that consists of income derived from investments or from the ownership of property. It includes dividends; interest; income equivalent to interest; rents and royalties (other than those derived from the active conduct of a trade or business conducted, at least in part, by employees of the NFFE); annuities; net gains from the sale of property that gives rise to passive income; net gains from certain transactions in financial assets (including commodities, futures and forward contracts, and options); net foreign currency gains; net income from swaps; and amounts received under cash value insurance contracts.

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Passive Income means the portion of gross income that consists of income derived from investments or from the ownership of property. It includes dividends; interest; income equivalent to interest; rents and royalties (other than those derived from the active conduct of a trade or business conducted, at least in part, by employees of an active NFE); annuities; net gains from the sale of property that gives rise to Passive Income; net gains from certain transactions in financial assets (including commodities, futures and forward contracts, and options); net foreign currency gains; net income from swaps; and amounts received under cash value insurance contracts.

Non-Financial Entity (NFE) means any entity that is not a Financial Institution.

Active Non-Financial Entity (Active NFE) means any NFE that meets any of the following criteria:

- i) less than 50% of the NFE's gross income for the preceding calendar year or other appropriate reporting period is Passive Income and less than 50% of the assets held by the NFE during the preceding calendar year or other appropriate reporting period are assets that produce or are held for the production of Passive Income;
- ii) the stock of the NFE is regularly traded on an established securities market or the NFE is a Related Entity of an Entity the stock of which is regularly traded on an established securities market;
- iii) the NFE is a Governmental Entity, an International Organization, a Central Bank, or an Entity wholly owned by one or more of the foregoing;
- iv) all or substantially all of the activities of the NFE consist of holding (in whole or in part) the outstanding stock of, or providing financing and services to, one or more subsidiaries that engage in trades or businesses other than the business of a Financial Institution, except that an NFE does not qualify for this status if the NFE functions (or holds itself out) as an investment fund, such as a private equity fund, venture capital fund, leveraged buyout fund, or any investment vehicle whose purpose is to acquire or fund companies and then hold interests in those companies as capital assets for investment purposes;
- v) the NFE is not yet operating a business and has no prior operating history, but is investing capital into assets with the intent to operate a business other than that of a Financial Institution, provided that the NFE does not qualify for this exception after 24 months from the date of the initial organisation of the NFE;
- vi) the NFE primarily engages in financing and hedging transactions with, or for, Related Entities that are not Financial Institutions, and does not provide financing or hedging services to any Entity that is not a Related Entity, provided that the group of any such Related Entities is primarily engaged in a business other than that of a Financial Institution; or
- vii) the NFE meets all of the following requirements:
 - a) it is established and operated in its jurisdiction of residence exclusively for religious, charitable, scientific, artistic, cultural, athletic, or educational purposes; or it is established and operated in its jurisdiction of residence and it is a professional organisation, business league, chamber of commerce, labour organisation, agricultural or horticultural organisation, civic league or an organisation operated exclusively for the promotion of social welfare;
 - b) it is exempt from income tax in its jurisdiction of residence;
 - c) it has no shareholders or members who have a proprietary or beneficial interest in its income or assets;
 - d) the applicable laws of the NFE's jurisdiction of residence or the NFE's formation documents do not permit any income or assets of the NFE to be distributed to, or applied for the benefit of, a private person or non-charitable Entity other than pursuant to the conduct of the NFE's charitable activities, or as payment of reasonable compensation for services rendered, or as payment representing the fair market value of property which the NFE has purchased; and
 - e) the applicable laws of the NFE's jurisdiction of residence or the NFE's formation documents require that, upon the NFE's liquidation or dissolution, all of its assets be distributed to a Governmental Entity or other non-profit organization, or escheat to the government of the NFE's jurisdiction of residence or to any political subdivision thereof.

Passive Non-Financial Entity (Passive NFE) means any Non-Financial Entity that is not an Active Non-Financial Entity.

3 Controlling Persons

General instructions

Please complete this section if the Entity is a Passive NFFE or Passive NFE. Additionally, complete this section if the Entity is an Investment Entity located in a Non-Participating Jurisdiction and managed by another Financial Institution.

Provide the requested information with respect to all reportable Controlling Persons who control or indirectly control the Entity.

Complete the table regarding each Controlling Person. In the table, indicate:

- The full name of each Controlling Person that is a U.S. Person or a resident of any jurisdiction other than Canada for tax purposes.
- The country where each Controlling Person is a tax resident.
- The Canadian Tax Identification Number (SIN).
- The Tax Identification Number (TIN) or functional equivalent for each country that each Controlling Person is a tax resident.
- If a TIN is not available, the reason why.
- The date of birth of each Controlling Person.
- Identify the type of Controlling Person.

For the purposes of Part XVIII (FATCA) and Part XIX (CRS), **Controlling Person** means a natural person who exercises direct or indirect control over the Entity. Generally, whether any person exercises control over an Entity is determined based on the particular situation in a manner consistent with how beneficial owners are identified for the purposes of Canada's Proceeds of Crime (Money Laundering) and Terrorist Financing Act. Generally speaking, a person is considered a controlling person of a corporation (note: under FATCA, they must also be a U.S. Person) if they directly or indirectly own or control 25% or more of the corporation. Where no natural person is identified as exercising control of a corporation, a director or senior official of the corporation is considered the controlling person of the corporation. In the case of a trust, a controlling person is the settlor(s), the trustee(s), the protector(s) (if any), the beneficiary(ies) or class(es) of beneficiaries, and any other natural person(s) exercising ultimate effective control over the trust. If any of those roles for a trust are filled by an Entity, you must look through the chain of ownership or control to the natural persons exercising ultimate effective control over the Entity. In the case of a legal arrangement other than a trust, a controlling person means a person or persons in equivalent or similar positions.

Note:

- Under Part XVIII (FATCA), U.S. citizens are required to provide their U.S. TIN.
- Please note that, if they fail to provide a TIN, they may be subject to a penalty under Canada's Income Tax Act.

4 Financial institutions

FATCA Definitions

Canadian Financial Institution An Entity that holds a financial account at a financial institution in Canada may be asked to declare whether it is itself a financial institution. Not all Entities in the financial sector are considered financial institutions. To be a financial institution, an Entity must be a custodial institution, a depository institution, an investment entity, or an insurance company that offers cash value insurance contracts or annuity contracts. Further guidance on what Entities are financial institutions is available on the *CRA Guidance for Canadian Financial Institutions*.

Global Intermediary Identification Number (GIIN) The term GIIN refers to an identification number that is assigned to certain financial institutions by the U.S. Internal Revenue Service.

Foreign Financial Institution (FFI) – A term that appear in the Intergovernmental Agreement, between Canada and the United States, but is not defined there. It is defined in IRS guidance and U.S. Treasury Regulations to include (but is not limited to) depository institutions (like banks), custodial institutions (like mutual funds), investment entities (like hedge funds and private equity funds), and certain types of insurance companies that offer cash value insurance products or annuities. An FFI is foreign from the perspective of the U.S. (for example, a Canadian chartered bank is a foreign financial institution).

4 Financial institutions (continued)

Participating Foreign Financial Institution Some countries have not entered into an intergovernmental agreement for automatic exchange of information with the U.S. A Participating Foreign Financial Institution is a financial institution resident in a country that has directly entered into an agreement with the Internal Revenue Service (IRS) in the U.S. to identify U.S. account holders and report on their accounts. A Participating Foreign Financial Institution is not subject to FATCA withholding.

Partner Jurisdiction means a jurisdiction that has in effect an agreement with the United States to facilitate the implementation of FATCA. The IRS shall publish a list identifying all Partner Jurisdictions.

Partner Jurisdiction Financial Institution (including Canadian Financial Institution) means:

- i) any Financial Institution that is resident in a jurisdiction that has in effect an intergovernmental agreement with the United States to facilitate the implementation of FATCA (a "Partner Jurisdiction"), but excludes any branch of that Financial Institution that is located outside such jurisdiction, and
- ii) any branch of a financial institution that is not established in the Partner Jurisdiction, if such branch is located in the Partner Jurisdiction.

Deemed-Compliant Foreign Financial Institution means any Financial Institution or other entity resident in Canada or a Partner Jurisdiction without a Global Intermediary Identification Number (GIIN) that is identified in Annex II of an Intergovernmental Agreement as a Deemed-Compliant Foreign Financial Institution or an Exempt Beneficial Owner (collectively, a non-reporting financial institution).

Deemed-Compliant Foreign Financial Institution includes:

- a Financial Institution with a Local Client Base
- Local Bank
- Financial Institution with Only Low-Value Accounts
- Sponsored Investment Entity and Controlled Foreign Corporation
- Sponsored, Closely Held Investment Vehicle
- Restricted Fund
- Regulated Collective Investment Vehicle

Exempt Beneficial Owner includes:

- Central Banks (e.g., The Bank of Canada)
- International Organizations
- Tax Treaty-Qualified Retirement Funds (e.g., Canadian registered pension and retirement plans)
- Investment Entities Wholly Owned by an Exempt Beneficial Owner
- Tax Exempt Organizations as identified in an Intergovernmental Agreement

Nonparticipating financial institution (NPFI)

An NPFI is defined in subparagraph 1(r) of Article 1 of the Intergovernmental Agreement as a Financial Institution that is not FATCA compliant. This situation will arise when:

- the Financial Institution is in a jurisdiction that does not have an intergovernmental agreement with the U.S. and the Financial Institution has not entered into an FFI agreement with the IRS; or
- the Financial Institution is listed by the IRS as being an NPFI after the procedures for significant non-compliance under an intergovernmental agreement have been followed.

Other Non-Reporting Financial Institution, including an Exempt Beneficial Owner means a Financial Institution outside Canada or a Partner Jurisdiction that qualifies as a deemed compliant financial institution and an exempt beneficial owner. The term "Other Non-Reporting Financial Institution, including an Exempt Beneficial Owner" also means a certified deemed-compliant FFI and Exempt beneficial owner, as each term is defined under relevant U.S. Treasury Regulations.

Registered Deemed Compliant FFI means a Financial Institution in a Partner Jurisdiction that has a Global Intermediary Identification Number (GIIN) (generally referred to as a reporting financial institution).

CRS Definitions

Note: These are selected definitions provided to assist you with the completion of this form. Further details can be found within the OECD “Common Reporting Standard for Automatic Exchange of Financial Account Information” (the “CRS”), the associated “Commentary” to the CRS, and domestic guidance. This can be found at the following link: <http://www.oecd.org/tax/automatic-exchange>.

Financial institution means a “Custodial Institution,” a “Depository Institution,” an “Investment Entity,” or a “Specified Insurance Company.” Please see the relevant domestic guidance and the CRS for further classification definitions that apply to Financial Institutions.

Custodial Institution means any Entity that holds, as a substantial portion of its business, financial assets for the account of others. A “substantial portion” means 20% or more of the Entity’s gross income is attributable to the holding of Financial Assets and related financial services during the shorter of: (i) the three-year period that ends on 31 December (or the final day of a non-calendar year accounting period) prior to the year in which the determination is being made; or (ii) the period during which the Entity has been in existence.

Depository Institution means any Entity that accepts deposits in the ordinary course of a banking or similar business. Entities that fall within this definition include Entities regulated in Canada as a bank, a trust and loan company, a credit society, a savings and credit union, or a caisse populaire.

Specified Insurance Company means any Entity that is an insurance company (or the holding company of an insurance company) that issues, or is obligated to make payments with respect to, a cash value insurance contract or an annuity contract, and is regulated as an insurance business under the laws, regulations, or practices of any jurisdiction in which the Entity is doing business. Insurance companies that provide only general insurance or term life insurance are not specified insurance companies.

Investment Entity: includes two types of Entities:

- i) an Entity that primarily conducts as a business one or more of the following activities or operations for or on behalf of a customer:
 - trading in money market instruments (cheques, bills, certificates of deposit, derivatives, etc.); foreign exchange; exchange, interest rate and index instruments; transferable securities; or commodity futures trading;
 - individual and collective portfolio management; or
 - otherwise investing, administering, or managing Financial Assets or money on behalf of other persons.

Such activities or operations do not include rendering non-binding investment advice to a customer. An Entity is treated as primarily carrying on this business if 50% of its gross income over the shorter of the last 3 fiscal periods or the period it’s been in existence comes from this activity.

- ii) The second type of “Investment Entity” (“Investment Entity managed by another Financial Institution”) is any Entity the gross income of which is primarily attributable to investing, reinvesting, or trading in financial assets where the Entity is an Investment Entity managed by another Entity that is a Depository Institution, a Custodial Institution, a Specified Insurance Company, or the first type of Investment Entity.

Investment Entity located in a Non-Participating Jurisdiction and managed by another Financial Institution: An Entity the gross income of which is primarily attributable to investing, reinvesting, or trading in financial assets if the Entity is (i) an Investment Entity managed by a Financial Institution and (ii) not in a Participating Jurisdiction Financial Institution.

Investment Entity managed by another Financial Institution: An Entity is managed by another Entity if the managing Entity performs, either directly or through another service provider on behalf of the managed Entity, any of the activities or operations described in clause (i) above in the definition of ‘Investment Entity’. An Entity only manages another Entity if it has discretionary authority to manage the other Entity’s assets (either in whole or part). An Entity will still be treated as professionally managed by another Entity even if it has more than one managing Entity.

Non-Reporting Financial Institution means any Financial Institution that is:

- a Governmental Entity
- The Bank of Canada
- an International Organization (including a Canadian office of an international organization as defined under subsection 2(l) of the Foreign Missions and International Organizations Act)
- a Broad Participation Retirement Fund
- a Narrow Participation Retirement Fund
- a Pension Fund of a Governmental Entity, International Organization or Central Bank (in the case of Canada, the Bank of Canada)
- a Qualified Credit Card Issuer
- an Exempt Collective Investment Vehicle
- a Trust where the trustee of the trust is a reporting financial institution and reports all information required to be reported with respect to all reportable accounts of the trust
- a prescribed entity under section 9005 of the Income Tax Regulations (generally registered plans, including TFSAs and other entities)
- Financial Institution with a Local Client Base

4 Financial institutions (continued)

Participating Jurisdiction means a jurisdiction with which an agreement is in place pursuant to which it will provide the information set out in the CRS.

Participating Jurisdiction Financial Institution means

- i) any Financial Institution that is tax resident in a Participating Jurisdiction, but excludes any branch of that Financial Institution that is located outside of that jurisdiction, and
- ii) any branch of a Financial Institution that is not tax resident in a Participating Jurisdiction, if that branch is located in such Participating Jurisdiction.

5 Intermediaries

A person or more typically a financial institution acting in the capacity of a custodian, broker, nominee, or an agent for the beneficial owner of the account. An intermediary is holding a financial account other than for its own benefit.

6 Declaration and signatures

A duly authorized representative of the Entity must sign the Self-Certification declaration and certify that the information provided is correct and accurate.