

Common Reporting Standard (CRS) Due Diligence for Citizenship / Residency by Investment

Citizenship by Investment (CBI) and Residence by Investment (RBI) programs are being offered by a substantial number of jurisdictions and allow foreign individuals to obtain citizenship or temporary or permanent residence rights based on a local investment for a flat fee.

Under Section VII of the CRS, financial institutions are required to perform additional due diligence for any individual or controlling person(s) opening an account in a participating CRS jurisdiction where the tax residence on the CRS self-certification form is a CBI or RBI jurisdiction (per the OECD list and CRS reporting formats (v 5.06) provided by Russian tax authorities)¹.

For new to bank accounts, please review the questions below as provided by the OECD. Please respond to each question accordingly.

Full name of individual account holder or controlling person (as provided on CRS Self Cert):

- | | | | | |
|---|-----|--------------------------|----|--------------------------|
| 1. Did you obtain residence rights under a CBI / RBI scheme? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |
| 2. Do you hold residence rights in any other jurisdiction(s)? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |
| 3. Have you spent more than 90 days in any other jurisdiction(s) during the previous year? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |
| 4. Have you filed income tax returns in any other jurisdiction(s) during the previous year? | Yes | <input type="checkbox"/> | No | <input type="checkbox"/> |

If you answered "Yes" to any of the above questions, please list the jurisdiction(s) not already reflected on the CRS Self Certification form: _____

In addition, please provide an updated CRS Self Certification reflecting the added jurisdictions or reasonable explanation of why the jurisdiction is no longer a tax residency.

Print name: _____

Signature: _____ Date: _____

¹ Jurisdictions according to CRS reporting formats (v 5.06) provided by Russian tax authorities and per OECD list: Antigua and Barbuda, Bahamas, Bahrain, Barbados, Cyprus, Dominica, Grenada, Malta, Montenegro, Panama, Turkey, Saint Kitts and Nevis, Saint Lucia, Seychelles, Turks and Caicos Islands, United Arab Emirates, Vanuatu