Entity Tax Residency

Self-Certification Form
CRS - E

December 2016

Please read these instructions before completing the form.

Regulations based on the Organisation for Economic Cooperation and Development ("OECD") Common Reporting Standard (“CRS”) require Financial Institutions ("FIs") to collect and report certain information about an account holder’s tax residency. If the account holder’s tax residence is located outside the country where the FI maintaining the account is located, we may be legally obliged to pass on the information in this form and other financial information with respect to your financial accounts to the tax authorities in the country where the FI is located and they may exchange this information with tax authorities of another jurisdiction or jurisdictions pursuant to intergovernmental agreements to exchange financial account information.

CHASE

J.P.Morgan

How to complete this form

Who should complete this form?

Please complete this form where you need to self-certify on behalf of an entity account holder.

- If you are an individual account holder or sole trader or sole proprietor do not complete this form. Instead please complete an “Individual tax residency self-certification form”.
- For joint or multiple account holders please complete a separate form for each account holder.

If the Account Holder is a U.S. tax resident under U.S. law, you should indicate that you are a U.S. tax resident on this form and you also need to complete and provide an IRS W-9 form. For more information on tax residence, please consult your tax adviser or the information at the following link: OECD automatic exchange of information portal.[1]

Where the Account Holder is a Passive Non Financial Entity ("NFE"), or an Investment Entity located in a Non-Participating Jurisdiction managed by another Financial Institution: Please provide information on the natural person(s) who exercise control over the Account Holder (individuals referred to as “Controlling Person(s)”) by completing a “Controlling Person tax residency self-certification form” for each Controlling Person. This information should be provided by all Investment Entities located in a Non-Participating Jurisdiction managed by another FI.

You should indicate the capacity in which you have signed in Part 4 (e.g., as custodian or nominee of an account on behalf of the account holder, or under a signatory authority or power of attorney).

1 http://www.oecd.org/tax/automatic-exchange/

Understanding the Terminology

You can find summaries of defined terms such as an "Account Holder", entity classifications such as “Financial Institution” and “International Organisation” and other terms, in the Appendix.
For additional information on overcoming common form rejection reasons please refer to the following link https://www.jpmorgan.com/directdoc/assist-completion-CRS-self-certification.pdf

Validity of form and No Tax Advice notice

This form is intended to request information consistent with local law requirements.

This form will remain valid unless there is a change in circumstances relating to information, such as the Account Holder’s tax status or other mandatory field information that makes the form incorrect or incomplete. In that case you must notify us and provide an updated self-certification.

As a financial institution, we are not allowed to give tax advice. Your tax adviser may be able to assist you in answering specific questions on this form. Your domestic tax authority can provide guidance regarding how to determine your tax status.

More information on the rules

You can find out more information, including a list of jurisdictions that have signed agreements to automatically exchange information, along with details about the information being requested, on the OECD automatic exchange of information portal at http://www.oecd.org/tax/automatic-exchange/.

Mandatory fields are marked with *

Scroll over icon to reveal additional information to assist in completing the field.

Entity tax residency self-certification form (CRS – E)

Please complete parts 1-3 by typing the details into the form or using BLOCK CAPITALS if completing by hand. Mandatory fields are marked with *.

Part 1 - Identification of the Account Holder

A: Legal Name of Entity/Branch*

Fulcrum Funds SPC - Fulcrum Energy-Infrastructure-Renewables Fund SP

B: Country of incorporation or organisation*

Cayman Islands

C: Current Residence Address*

Line1 House/Apt/Suite, Name, Number, Street

PO Box 309, Ugland house

Line 2 Town/City/, Province/County/State

Grand Cayman

Country Cayman Islands

Postal Code/Zip Code KY1-1104

D: Mailing Address (please only complete if different from your current residence address above)

Line1 House/Apt/Suite, Name, Number, Street

Fulcrum Asset Management

Line 2 Town/City/, Province/County/State

Marble Arch House, 66 Seymour St, London

Country United Kingdom

Postal Code/Zip Code W1H 5BT

Part 2* - Entity Type

Please classify the Account Holder by selecting one of the following. Further information on definitions can be found in the Appendix.

Entity Type*

A	Financial Institution - Investment Entity	
(i.)	An Investment Entity located in a Non-Participating Jurisdiction and managed by another Financial Institution	☐
(ii.)	Other Investment Entity	☑
B	Financial Institution – Depository Institution, Custodial Institution or Specified Insurance Company	☐
C	Active NFE – a corporation the stock of which is regularly traded on an established securities market or a corporation which is a related entity of such a corporation	☐
D	Active NFE – a Government Entity or Central Bank	☐
E	Active NFE – an International Organisation	☐
F	Active NFE – other than C–E	☐
G	Passive NFE	☐

Please provide additional required information depending on your entity type above.

Additional Entity Information

Entity Type	Information needed
A or B	If you have selected A or B above, please provide, if held, the Account Holder's Global Intermediary Identification Number ("GIIN") obtained for FATCA purposes. LJE6P3 _____ 99999 _____ SL _____ 136 _____
C	If you have selected C, please provide the name of the established securities market on which the corporation is regularly traded: If you are a Related Entity of a regularly traded corporation, please provide the name of that regularly traded corporation: The Entity classified as C is a Related Entity of .
A (i.) or G	Controlling Persons of Passive NFEs Please indicate the name of any Controlling Person(s) of the Account Holder*

Please complete a "*Controlling Person tax residency self-certification form*" for each Controlling Person.*

Note: Please see definition of Controlling Person in Appendix. If there are no natural person(s) who exercise control of the Entity then the Controlling Person will be the natural person(s) who hold the position of senior managing official.

Part 3* - Country of Residence for Tax Purposes and related Taxpayer Identification Number or functional equivalent* (“TIN”) (see Appendix)

Please complete the following table indicating:

(i) where the Account Holder is tax resident, and

(ii) the Account Holder’s TIN for each country indicated.

Please note:

- If the Account Holder is not tax resident in any jurisdiction (e.g., because it is fiscally transparent), please indicate that on line 1 and provide its place of effective management or country in which its principal office is located.
- If the Account Holder is tax resident in more than three countries please use a separate sheet.
- If a TIN is unavailable please provide the appropriate reason A, B or C where appropriate:

  Reason A:

  The country/jurisdiction where the Account Holder is resident does not issue TINs to its residents

  Reason B:

  The Account Holder is otherwise unable to obtain a TIN or equivalent number.

  Please explain why you are unable to obtain a TIN in the table below if you have selected this reason.

  Reason C:

  No TIN is required.

  Please only select this reason if the domestic law of the relevant jurisdiction does not require the collection of the TIN issued by such country/jurisdiction

	Country/Jurisdiction of tax residence	TIN	If no TIN available enter Reason A,B or C
1	Cayman Islands		A
2			
3			

Please explain in the following boxes why you are unable to obtain a TIN if you selected Reason B above.
1
2
3

Part 4*

Declaration and Signature

The Account Holder understands that the information supplied by it is covered by the full provisions of the terms and conditions governing the Account Holder's relationship with the Financial Institution setting out how the Financial Institution may use and share the information supplied by the Account Holder.

The Account Holder acknowledges that the Financial Institution may disclose and transfer to the Financial Institution's parent companies, and its and their respective branches, subsidiaries, affiliates, representative offices, or third party service providers located anywhere in the world (in or outside the country or jurisdiction in which the Account Holder resides, in which their relationship with the Financial Institution is maintained, in which the account or transaction is booked, in which information is collected and/or retained or in which the transaction is conducted) the information contained in this form and other information regarding the Account Holder, any Controlling Person and any Reportable Account(s) when considered necessary by the Financial Institution for its business purposes or in connection with, to comply with, or to facilitate compliance with, any law, regulation, court order or requirement (including under any code, guideline, standard, policy, circular or notice) of a governmental, regulatory, supervisory, law enforcement, prosecuting, tax or similar authority or industry body in any jurisdiction existing currently or in the future, or for the purposes of ongoing cooperation with such governmental, regulatory and/or statutory authority, or to comply with any agreement or arrangement with such authority or between such authorities in any jurisdiction existing currently or in the future. The Account Holder consents to and instructs and authorizes the Financial Institution to make such disclosures and transfers and expressly waive any protection or right under data protection, confidentiality, or any other applicable law, to the extent necessary for such disclosures and transfers.

The Account Holder acknowledges that the information contained in this form and information regarding the Account Holder may be reported to the tax authorities of the country/jurisdiction in which this account(s) is/are maintained and exchanged with tax authorities of another country/jurisdiction or countries/jurisdictions in which the Account Holder may be tax resident pursuant to intergovernmental agreements to exchange financial account information.

I certify that I am authorised to sign for the Account Holder in respect of all the account(s) to which this form relates.

The Account Holder declares that all statements made in this declaration are, to the best of its knowledge and belief, correct and complete.

The Account Holder undertakes to advise the Financial Institution, within 90 days of any change in circumstances which affects the tax residency status of the Account Holder identified in Part 1 of this form or causes the information contained herein to become incorrect or incomplete (including any changes to the information on controlling persons identified in Part 2 question 2a), and to provide the Financial Institution that maintains the account with a suitably updated self-certification and Declaration within 90 days of such change in circumstances.

Signature:*	
Print name:*	Michelle Wilson-Clarke
Date:* (dd/mm/yyyy)	10-08-2022
Capacity*	Director

Please indicate the capacity in which you are signing the form (for example 'Authorised Officer').

If signing under a power of attorney please also attach a certified copy of the power of attorney.

Appendix – Summary Descriptions of Select Defined Terms

Note: These are selected summaries of defined terms 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. Relevant information can be found at the OECD automatic exchange of information portal at http://www.oecd.org/tax/automatic-exchange/.

If you have any questions then please contact your tax adviser or domestic tax authority.

Account Holder

The "Account Holder" is the person listed or identified as the holder of a Financial Account by the Financial Institution that maintains the account. This is regardless of whether such person is a flow-through Entity. Thus, for example, if a trust or an estate is listed as the holder or owner of a Financial Account, the trust or estate is the Account Holder, rather than the trustee or the trust's owners or beneficiaries. Similarly, if a partnership is listed as the holder or owner of a Financial Account, the partnership is the Account Holder, rather than the partners in the partnership. A person, other than a Financial Institution, holding a Financial Account for the benefit or account of another person as agent, custodian, nominee, signatory, investment advisor, or intermediary, is not treated as holding the account, and such other person is treated as holding the account.

Active NFE

An Active NFE if it meets any of the criteria listed below. In summary, those criteria refer to:

- active NFEs by reason of income and assets;
- publicly traded NFEs;
- Governmental Entities, International Organisations, Central Banks, or their wholly owned Entities;
- holding NFEs that are members of a non-financial group;
- start-up NFEs;
- NFEs that are liquidating or emerging from bankruptcy;
- treasury centres that are members of a non-financial group; or
- non-profit NFEs.

An entity will be classified as an Active NFE if it meets any of the following criteria:

a) 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;

b) 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;

c) the NFE is a Governmental Entity, an International Organisation, a Central Bank, or an Entity wholly owned by one or more of the foregoing;

d) 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 Entity does not qualify for this status if the Entity 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;

e) the NFE is not yet operating a business and has no prior operating history (a "start-up NFE") 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 the date that is 24 months after the date of the initial organisation of the NFE;

f) the NFE 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;

g) 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

h) the NFE meets all of the following requirements (a “non-profit NFE”)

i) 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;

ii) it is exempt from income tax in its jurisdiction of residence;

iii) it has no shareholders or members who have a proprietary or beneficial interest in its income or assets;

iv) 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

v) 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 organisation, or escheat to the government of the NFE’s jurisdiction of residence or any political subdivision.

Note: Certain entities (such as U.S. Territory NFFEs) may qualify for Active NFFE status under FATCA but not Active NFE status under the CRS.

Control	"Control" over an Entity is generally exercised by the natural person(s) who ultimately has a controlling ownership interest (typically on the basis of a certain percentage (e.g. 10%)) in the Entity. Where no natural person(s) exercises control through ownership interests, the Controlling Person(s) of the Entity will be the natural person(s) who exercises control of the Entity through other means. Where no natural person or persons are identified as exercising control of the Entity through ownership interests, the Controlling Person of the Entity is deemed to be the natural person who holds the position of senior managing official.
Controlling Person(s)	“Controlling Person(s)” are the natural person(s) who exercise control over an entity. Where that entity is treated as a Passive Non-Financial Entity (“Passive NFE”) then a Financial Institution is required to determine whether or not these Controlling Persons are Reportable Persons. This

	definition corresponds to the term “beneficial owner” described in Recommendation 10 and the Interpretative Note on Recommendation 10 of the Financial Action Task Force Recommendations (as adopted in February 2012). In the case of a trust, the Controlling Person(s) are the settlor(s), the trustee(s), the protector(s) (if any), the beneficiary(ies) or class(es) of beneficiaries, or any other natural person(s) exercising ultimate effective control over the trust (including through a chain of control or ownership). Under the CRS the settlor(s), the trustee(s), the protector(s) (if any), and the beneficiary(ies) or class(es) of beneficiaries, are always treated as Controlling Persons of a trust, regardless of whether or not any of them exercises control over the activities of the trust. Where the settlor(s) of a trust is an Entity then the CRS requires Financial Institutions to also identify the Controlling Persons of the settlor(s) and when required report them as Controlling Persons of the trust. In the case of a legal arrangement other than a trust, “Controlling Person(s)” means persons in equivalent or similar positions.
Custodial Institution	The term “Custodial Institution” means any Entity that holds, as a substantial portion of its business, Financial Assets for the account of others. This is where the Entity’s gross income attributable to the holding of Financial Assets and related financial services equals or exceeds 20% of the Entity’s gross income 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	The term “Depository Institution” means any Entity that accepts deposits in the ordinary course of a banking or similar business.
FATCA	FATCA stands for the US provisions commonly known as the Foreign Account Tax Compliance Act, which were enacted into US law as part of the Hiring Incentives to Restore Employment (HIRE) Act on March 18, 2010. FATCA creates a new information reporting and withholding regime for payments made to certain non-US financial institutions and other non-US entities.
Entity	The term “Entity” means a legal person or a legal arrangement, such as a corporation, organisation, partnership, trust or foundation. This term covers any person other than an individual (i.e. a natural person).
Financial Account	A Financial Account is an account maintained by a Financial Institution and includes: Depository Accounts; Custodial Accounts; Equity and debt interest in certain Investment Entities; Cash Value Insurance Contracts; and Annuity Contracts.
Financial Institution	The term “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.
International Organisation	International Organisation” includes any intergovernmental organisation (including a supranational organisation), or wholly owned agency or instrumentality of such an organisation, that: • primarily comprises governments; and • has in effect a headquarters or substantially similar agreement with a jurisdiction; and • the income of which is not for the benefit of private persons. Arrangements substantially similar to headquarters arrangements include, for example, arrangements that entitle the organisation’s offices or establishments in the jurisdiction (e.g. a subdivision, or a local or regional office) to privileges and immunities.
Investment Entity	The term “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.

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 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	The term “Investment Entity located in a Non-Participating Jurisdiction and managed by another Financial Institution” means any Entity the gross income of which is primarily attributable to investing, reinvesting, or trading in Financial Assets if the Entity is (i) managed by a Financial Institution and (ii) not 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). Where an Entity is managed by a mix of Financial Institutions, NFEs or individuals, the Entity is considered to be managed by another Entity that is a Depository Institution, a Custodial Institution, a Specified Insurance Company, or the first type of Investment Entity, if any of the managing Entities is such another Entity.
NFE	An “NFE” is any Entity that is not a Financial Institution.
Non-Reporting Financial Institution	A Non-Reporting Financial Institution” means any Financial Institution that is: • a Governmental Entity, International Organisation or Central Bank, other than with respect to a payment that is derived from an obligation held in connection with a commercial financial activity of a type engaged in by a Specified Insurance Company, Custodial Institution, or Depository Institution; • a Broad Participation Retirement Fund; a Narrow Participation Retirement Fund; a Pension Fund of a Governmental Entity, International Organisation or Central Bank; or a Qualified Credit Card Issuer; • an Exempt Collective Investment Vehicle; • a Trustee-Documented Trust: 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; or • any other defined in a country's domestic law as a Non-Reporting Financial Institution.
Participating Jurisdiction	A “Participating Jurisdiction” means a jurisdiction with which an agreement is in place pursuant to which it will provide the information required on the automatic exchange of financial account information set out in the Common Reporting Standard and that is identified in a published list.

Participating Jurisdiction Financial Institution	The term “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.
Passive NFE	Under the CRS a “Passive NFE” means any NFE that is not an Active NFE. An Investment Entity located in a Non-Participating Jurisdiction and managed by another Financial Institution is also treated as a Passive NFE for purposes of the CRS.
Related Entity	An Entity is a “Related Entity” of another Entity if either Entity controls the other Entity, or the two Entities are under common control. For this purpose control includes direct or indirect ownership of more than 50% of the vote and value in an Entity.
Reportable Account	The term “Reportable Account” means an account held by one or more Reportable Persons or by a Passive NFE with one or more Controlling Persons that is a Reportable Person.
Reportable Jurisdiction	A "Reportable Jurisdiction" is a jurisdiction with which an obligation to provide financial account information is in place and that is identified in a published list.
Reportable Jurisdiction Person	A "Reportable Jurisdiction Person" is an Entity that is tax resident in a Reportable Jurisdiction(s) under the tax laws of such jurisdiction(s) - by reference to local laws in the country where the Entity is established, incorporated or managed. An Entity such as a partnership, limited liability partnership or similar legal arrangement that has no residence for tax purposes shall be treated as resident in the jurisdiction in which its place of effective management is situated. As such if an Entity certifies that it has no residence for tax purposes it should complete the form stating the address of its principal office. Dual resident Entities may rely on the tiebreaker rules contained in tax conventions (if applicable) to determine their residence for tax purposes.
Reportable Person	A “Reportable Person” is defined as a “Reportable Jurisdiction Person”, other than: • a corporation the stock of which is regularly traded on one or more established securities markets; • any corporation that is a Related Entity of a corporation described above; • a Governmental Entity; • an International Organisation; • a Central Bank; *or* • a Financial Institution (except for an Investment Entity described in Sub Paragraph A(6) b) of the CRS that is not are Participating Jurisdiction Financial Institution. Instead, such Investment Entities are treated as Passive NFEs.)
Resident for tax purposes	Each jurisdiction has its own rules for defining tax residence, and jurisdictions have provided information on how to determine whether an entity is tax resident in the jurisdiction on the following website: http://www.oecd.org/tax/automatic-exchange/. Generally, an Entity will be resident for tax purposes in a jurisdiction if, under the laws of that jurisdiction (including tax conventions), it pays or should be paying tax therein by reason of its domicile, residence, place of management or incorporation, or any other criterion of a similar nature, and not only from sources in that jurisdiction. Dual resident Entities may rely on the tiebreaker rules contained in tax conventions (if applicable) to solve cases of double residence for determining their residence for tax purposes. An Entity such as a partnership, limited liability

	partnership or similar legal arrangement that has no residence for tax purposes shall be treated as resident in the jurisdiction in which its place of effective management is situated. For additional information on tax residence, please talk to your tax adviser or see the OECD automatic exchange of information portal at http://www.oecd.org/tax/automatic-exchange/.
Specified Insurance Company	The term “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.
TIN (including “functional equivalent”)	The term “TIN” means Taxpayer Identification Number or a functional equivalent in the absence of a TIN. A TIN is a unique combination of letters or numbers assigned by a jurisdiction to an individual or an Entity and used to identify the individual or Entity for the purposes of administering the tax laws of such jurisdiction. Further details of acceptable TINs can be found at the OECD automatic exchange of information portal at http://www.oecd.org/tax/automatic-exchange/. Some jurisdictions do not issue a TIN. However, these jurisdictions often utilise some other high integrity number with an equivalent level of identification (a “functional equivalent”). Examples of that type of number include, for Entities, a Business/company registration code/number.