

INFORMATION SHEET

FATCA: The *Foreign Account Tax Compliance Act* ("FATCA") is a US law aimed at countering tax evasion by US citizens and residents through accounts held with financial institutions, including insurance companies, and operating in foreign jurisdictions. In the United States, this law came into force on 1 July 2014.

On 21 December 2012, the Irish Government concluded with the American Government the Intergovernmental Agreement aimed at applying the FATCA legislation to all entities operating in Ireland, and Statutory Instrument no. 292 of 20 June 2014 implemented the FATCA regulations in Ireland effective from 1 July 2014.

The above Irish law transposing FATCA imposes, with retroactive effect **from 1 July 2014**, on Irish financial institutions, including this Company, **obligations of identification and classification of the status or otherwise as a US citizen/tax payer ("U.S. Person") of its clients**, including by comparison with other information acquired by the Company and monitoring activities performed by it; with consequent annual communications required by law to the Office of the Revenue Commissioners (the Irish tax authorities), which will handle the transmission of information relating to U.S. Person clients to the revenue agency of the United States (Internal Revenue Service - IRS).

Under FATCA, in the event of refusal in whole or in part to provide the information necessary for the identification of the *Status* or otherwise as a US citizen/tax payer or any documentation requested by the Company after the conclusion of the contract, it will communicate to the Office of the Revenue Commissioners the data of the Contracting Party and of the persons entitled to the insured benefits, assuming an American connection of some sort.

CRS: With the Finance Act 2014, through the inclusion of Section 891F in the Taxes Consolidation Act 1997, and with Statutory Instrument no. 583 of 2015, which made the regulation operational from 31 December 2015, provisions were also issued on the obligations to be met in order to implement the automatic exchange of information deriving from agreements between Ireland and other foreign countries, apart from the United States of America. This exchange must take place through a shared communication standard developed by the OECD, called the "Common Reporting Standard" or "CRS". The above legislation imposes, with effect **from 1 January 2016**, on Irish financial institutions, including this Company, **obligations to identify and collect certain data on clients who are not fiscally resident in Ireland.**

It is therefore specified that for the financial accounts subject to disclosure, in accordance with the CRS regulations, the Company will send annually to the Office of the Revenue Commissioners the data of the Contracting Parties and the persons entitled to the insured services resident in foreign jurisdictions falling under the "Common Reporting Standard". For the Company, a body governed by Irish law, the obligation of identification, detection and communication also extends to all clients having tax residence in Italy.

In the event of refusal in whole or in part to provide the requested information, the Company will inform the Office of the Revenue Commissioners of the data of all those in relation to which there are indications of foreign tax residence (meaning any tax residence other than Irish).

FATCA and CRS: In order to correctly implement the above regulations, the Client is required to sign a self-declaration in which i) he declares his *Status* or otherwise as a U.S. Person or person of foreign tax residence (meaning any tax residence other than Irish); ii) the acknowledgment of the monitoring and reporting obligations envisaged by the above regulations incumbent on the Company; and iii) the commitment to promptly notify the Company of any changes to the previously declared data.

The Company is required to collect the requested information, which, in the cases stipulated by the law, must be transmitted to the Office of the Revenue Commissioners. If the Company is not in a position to meet its legal obligations even for omitted, incomplete or incorrect disclosure of information, it will be subject to administrative sanctions.

Further information can be found on the Office of the Revenue Commissioners website, AEOI (Automatic Exchange of Information) section. The contents are in English. Clarification can be requested at any time by sending an email to the following address: info@verafinancial.com.

Vera Financial dac

Beaux Lane House, Mercer Street Lower, Dublin D02 DH60, tel. (+353 1) 6319555 – fax (+353 1) 6319599 – info@verafinancial.com

Directors: D. Curran, T. Motteran (Italian), H. Griffey, D. Guest, R. Raichi (Italian)

Registered in Ireland as a designated activity Company – Registered no. 295034

Vera Financial dac is regulated by the Central Bank of Ireland - Vera Financial dac is part of the Cattolica Assicurazioni Group registered in the Insurance Group

Register c/o the Italian Regulator with no. 019

www.verafinancial.com

FATCA/CRS AUTOCERTIFICATION - CLIENTS WHO ARE NATURAL PERSONS (including sole traders)

The Client is requested to complete the following data in order to certify his status as a **U.S. Person** or **NON-U.S. Person** and/or a *person of foreign tax residence* (meaning any tax residence other than Irish).

Proposal/Certificate of capitalisation or Policy/Agreement

Number

Branch

Branch

Branch code

Sub branch code

Producer code

<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
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The undersigned as (indicate with an "X" the appropriate box)

Policyholder

Beneficiary (in the event of liquidation)

Surname and first name

Sex

Fiscal Code

<input type="text"/>	<input type="text"/>	<input type="text"/>
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Date of birth

Place of birth

County of birth

State of birth

<input type="text"/>	<input type="text"/>	<input type="text"/>	<input type="text"/>
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Identification document

Type

Number

<input type="text"/>	<input type="text"/>
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Date of issue

Expiration date

Authority

<input type="text"/>	<input type="text"/>	<input type="text"/>
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Place of issue

Province

State

<input type="text"/>	<input type="text"/>	<input type="text"/>
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Telephone number (with international prefix if relevant)

Registered residence

Address

Municipality

Postcode

<input type="text"/>	<input type="text"/>	<input type="text"/>
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Location

Province

State

<input type="text"/>	<input type="text"/>	<input type="text"/>
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Domicile

Address

Municipality

Postcode

<input type="text"/>	<input type="text"/>	<input type="text"/>
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Location

Province

State

<input type="text"/>	<input type="text"/>	<input type="text"/>
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Postal address

Address

Municipality

Postcode

<input type="text"/>	<input type="text"/>	<input type="text"/>
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Location

Province

State

<input type="text"/>	<input type="text"/>	<input type="text"/>
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PO Box

Address

Municipality

Postcode

<input type="text"/>	<input type="text"/>	<input type="text"/>
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Location

Province

State

<input type="text"/>	<input type="text"/>	<input type="text"/>
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He declares that he has citizenship in the <u>United States of America</u> or is in possession of the "Green Card"	Yes	No																					
He declares that he has tax residence in the <u>United States of America</u>	Yes	No																					
Power of attorney or attribution of powers of signature conferred to a subject with US address	Yes	No																					
TIN US - (complete only In the event of affirmative answer and attach photocopy) <table border="1"> <tr> <td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td> </tr> </table>																							

He declares that he has a tax residence in a foreign country (a country other than Ireland and the United States of America) ¹	Yes	No
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Foreign tax residence status (other than Ireland and the U.S.A.)	Foreign State issues the fiscal identification code (NIF, TIN) or a functional equivalent	Tax identification number issued by the State of residence ² (attach a photocopy)																					
	Yes No	<table border="1"> <tr> <td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td> </tr> </table>																					

He declares that he is in possession of further foreign tax residences in addition to those already declared ¹	Yes	No
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Foreign tax residence status (other than Ireland and the U.S.A.)	Foreign State issues the fiscal identification code (NIF, TIN) or a functional equivalent	Tax identification number issued by the State of residence ² (attach a photocopy)																					
	Yes No	<table border="1"> <tr> <td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td><td> </td> </tr> </table>																					
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Power of attorney or attribution of the powers of signature conferred to a subject with address in a foreign jurisdiction (Country other than Ireland and the United States of America)	Yes	No
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Place and date	Signature of the Client (or the legal representative)
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¹ In the event that the individual is resident for tax purposes in several States, all States of tax residence must be indicated. In order to resolve the double residence problem, the natural person may for the purposes of income tax apply the provisions contained in the double taxation agreement subscribed by the States in which he is a resident (so-called *tie-breaker rules*), which establish the criteria for determining, in the case of double residence, which of the two contracting States should take priority when considering the tax payer to be resident

² This field must be filled in only if the tax identification number is issued by the foreign state of residence

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DECLARATIONS

The undersigned declares that he has received the information under art. 2 of the Data Protection Acts 1998, as amended by the Data Protection (Amended) Act 2003, and, being aware of the criminal liability deriving from false claims, declares that the above information is correct, complete and truthful and, in the event of the conclusion of an insurance contract

- undertakes to give notice promptly and in writing to the Company, in accordance with the FATCA and CRS regulations, of any change in information relating to his *Status* or otherwise as a U.S. Person or person of foreign tax residence, providing documentation proving the change in these circumstances.
- acknowledges that the Company will, in accordance with the FATCA and CRS regulations, monitor personal data in order to verify any changes that may cause a change in the information relating to his own *Status* or otherwise as a U.S. Person or person of foreign tax residence and undertakes to provide the documentation requested by the Company for this purpose.
- is aware that the Company is required, in accordance with FATCA regulations, to communicate to the Office of the Revenue Commissioners the data of the Contracting Party and of the persons entitled to the insured benefits in the presence of an American connection of some sort and that such communication will be carried out even in the event of refusal by such persons to provide the information and/or the documentation required for the verification of the relevant *Status*.
- is aware that the Company is required, for the purposes of the CRS legislation, to communicate to the Office of the Revenue Commissioners, if the conditions are met, the data of the Contracting Party and of the persons entitled to the insured benefits if they are fiscally resident in foreign jurisdictions subject to communication (meaning any tax residence other than Irish, including Italian).

Place and date

Signature of the Client
(or the legal representative)

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TERMINOLOGY

FATCA: the "Foreign Account Tax Compliance Act", passed by the United States in the context of the "Hiring Incentives to Restore Employment" ("Hire Act") of 18 March 2010.

Common Reporting Standard (C.R.S.): this is the common reporting standard developed by the OECD containing the set of common rules and criteria governing adequate verification for tax purposes and the terms for the exchange of financial information for tax purposes.

Citizenship: this is the condition of the natural person (called the citizen) to whom the legal system of a State grant the complete set of civil and political rights.

Fiscal Residence: for the purposes of taxation on the income of natural persons, persons who for most of the tax period (at least 183 days) reside in Ireland or those who habitually live in the territory of the State are considered residents. In addition, those who, although no longer resident in Ireland, have moved their residence to another state for less than three years are considered to be Irish residents.

Green Card: its official name is *Permanent Resident Card*; this is the document containing the authorisation issued by the authorities of the [United States of America](#) (by [USCIS](#) - U.S. Citizenship and Immigration Services), which allows a foreigner to reside in the U.S.A. for an unlimited period of time.

TIN: *Taxpayer Identification Number*, ID number of the US tax payer.

Fiscal Identification Number (N.I.F.): this is a tax identification code or, in the absence of such code, a functional equivalent, issued by the State in which the holder of the account or the person entitled to it is resident for tax purposes.

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