

DECISION STEPS

Determine a Legal Person's Registerable Beneficial Owners ("RBOs")

August 2024



walkersglobal.com

Step 1

Direct ownership or control

Does the Legal Person have any individual who directly holds 25% or more of the shares, voting rights or partnership interests in the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQ 8 on directly holding shares, voting rights or partnership interests.
See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Yes.



Step 1

Direct ownership or control

Does the Legal Person have any individual who directly holds 25% or more of the shares, voting rights or partnership interests in the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQ 8 on directly holding shares, voting rights or partnership interests.
See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Step 2

Indirect ownership or control

Does the Legal Person have any individual who indirectly holds 25% or more of the shares, voting rights or partnership interests in the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQs 9 to 11 on indirectly holding shares, voting rights or partnership interests. See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Yes. No. Yes. No.

Any such individual is a Beneficial Owner.

Go to Step 2.



Step 1

Direct ownership or control

Does the Legal Person have any individual who directly holds 25% or more of the shares, voting rights or partnership interests in the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

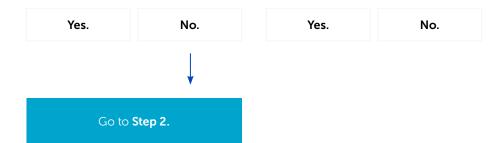
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Step 3

Ultimate effective control

Does the Legal Person have any individual who otherwise exercises ultimate effective control (meaning ownership or control exercised through a chain of ownership or other than direct control) over the management of the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQ 16 on "ultimate effective control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Yes.

Yes. No. Yes. No.

Any such individual is a Beneficial Owner.

Go to Step 3.



Step 1

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See FAQ 16 on "ultimate effective control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Yes. No. Yes. No.

Go to Step 2. Go to Step 3.

Yes.



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See FAQ 16 on "ultimate effective control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Step 4

Control through other means

Does the Legal Person have any individual who is identified as exercising control of the Legal Person through other means (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQ 17 on "control through other means". See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Yes. No.

Yes. No.

Any such individual is a Beneficial Owner.

Go to Step 3.

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Go to Step 4.

Yes.

Direct ownership or control

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Yes. No.



Step 2 Step 3 Step 1 Step 4 **Direct ownership Indirect ownership** Ultimate effective Control through or control or control control other means Does the Legal Person have any individual who directly holds 25% individual who indirectly holds 25% individual who otherwise exercises individual who is identified as or more of the shares, voting rights or more of the shares, voting rights exercising control of the Legal ultimate effective control (meaning or partnership interests in the Legal or partnership interests in the Legal ownership or control exercised Person through other means Person (other than solely in the Person (other than solely in the through a chain of ownership or (other than solely in the capacity other than direct control) over the capacity of a Professional Advisor capacity of a Professional Advisor of a Professional Advisor or a or a Professional Manager)? or a Professional Manager)? management of the Legal Person Professional Manager)? (other than solely in the capacity See FAQ 8 on directly holding shares, See FAQs 9 to 11 on indirectly See FAQ 17 on "control through of a Professional Advisor or a voting rights or partnership interests. holding shares, voting rights or other means". See FAQ 18 on the Professional Manager)? See FAQ 18 on the meaning of Professional partnership interests. See FAQ 18 on meaning of Professional Advisor and Advisor and Professional Manager. the meaning of Professional Advisor Professional Manager. and Professional Manager. See FAQ 16 on "ultimate effective control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager. Yes. No. Yes. No. Yes. No. Yes. No. Any such individual is a Go to Step 2. Go to Step 3. Beneficial Owner. Go to Step 4.



Step 2 Step 3 Step 1 Step 4 **Direct ownership Indirect ownership** Ultimate effective Control through or control or control control other means Does the Legal Person have any individual who directly holds 25% individual who indirectly holds 25% individual who otherwise exercises individual who is identified as or more of the shares, voting rights or more of the shares, voting rights exercising control of the Legal ultimate effective control (meaning or partnership interests in the Legal or partnership interests in the Legal ownership or control exercised Person through other means Person (other than solely in the Person (other than solely in the through a chain of ownership or (other than solely in the capacity of a Professional Advisor or a capacity of a Professional Advisor capacity of a Professional Advisor other than direct control) over the or a Professional Manager)? or a Professional Manager)? management of the Legal Person Professional Manager)? (other than solely in the capacity See FAQ 8 on directly holding shares, See FAQs 9 to 11 on indirectly See FAQ 17 on "control through of a Professional Advisor or a voting rights or partnership interests. holding shares, voting rights or other means". See FAQ 18 on the Professional Manager)? See FAQ 18 on the meaning of Professional partnership interests. See FAQ 18 on meaning of Professional Advisor and Advisor and Professional Manager. the meaning of Professional Advisor Professional Manager. and Professional Manager. See FAQ 16 on "ultimate effective control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager. Yes. No. Yes. No. Yes. No. Yes. No. Go to Step 2. Go to Step 3. Go to Step 4.



Step 1 **Direct ownership** or control Does the Legal Person have any individual who directly holds 25% or more of the shares, voting rights

See FAQ 8 on directly holding shares, voting rights or partnership interests. See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

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Person (other than solely in the

or a Professional Manager)?

capacity of a Professional Advisor

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Indirect ownership or control

Does the Legal Person have any individual who indirectly holds 25% or more of the shares, voting rights or partnership interests in the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

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See FAQ 17 on "control through other means". See FAQ 18 on the meaning of Professional Advisor and Professional Manager.



No. Any such individual is a Beneficial Owner. Go to Step 3.

Yes. No. Any such individual is a Beneficial Owner. Go to Step 4.

Yes. No. Any such individual is a Beneficial Owner. No need to consider Step 5.



Step 1 Step 2 Step 3 Step 4 Step 5 **Direct ownership Indirect ownership Ultimate effective** Control through **Trustees** or control or control control other means Does the Legal Person have any Do any trustees of a trust meet one individual who directly holds 25% individual who indirectly holds 25% individual who otherwise exercises individual who is identified as of the above conditions in relation or more of the shares, voting rights or more of the shares, voting rights ultimate effective control (meaning exercising control of the Legal to the Legal Person? If so, does or partnership interests in the Legal or partnership interests in the Legal ownership or control exercised Person through other means any such trustee have ultimate Person (other than solely in the Person (other than solely in the effective control over the activities through a chain of ownership or (other than solely in the capacity capacity of a Professional Advisor other than direct control) over the capacity of a Professional Advisor of a Professional Advisor or a of the trust (other than solely in the or a Professional Manager)? or a Professional Manager)? management of the Legal Person Professional Manager)? capacity of a Professional Advisor (other than solely in the capacity or a Professional Manager)? See FAQ 8 on directly holding shares, See FAQs 9 to 11 on indirectly See FAQ 17 on "control through of a Professional Advisor or a voting rights or partnership interests. holding shares, voting rights or other means". See FAQ 18 on the See FAQ 18 on the meaning of Professional Professional Manager)? See FAQ 18 on the meaning of Professional partnership interests. See FAQ 18 on meaning of Professional Advisor and Advisor and Professional Manager. See Advisor and Professional Manager. the meaning of Professional Advisor Professional Manager. FAQ 24 in relation to identifying a Senior and Professional Manager. See FAQ 16 on "ultimate effective Managing Official. control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager. Yes. No. Yes. No. Yes. No. Yes. No. Yes. No. Any such individual is a Any such individual is a Go to Step 2. Go to Step 5. Beneficial Owner. Beneficial Owner. Go to Step 3. Go to Step 4.



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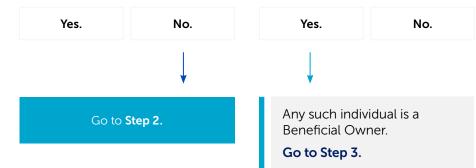
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Yes. No.

Any such individual is a Beneficial Owner.

No need to consider Step 5.



Step 1 Step 2 Step 3 Step 4 Step 5 **Direct ownership Indirect ownership Ultimate effective** Control through **Trustees** or control or control control other means Does the Legal Person have any Do any trustees of a trust meet one individual who directly holds 25% individual who indirectly holds 25% individual who otherwise exercises individual who is identified as of the above conditions in relation or more of the shares, voting rights or more of the shares, voting rights ultimate effective control (meaning exercising control of the Legal to the Legal Person? If so, does or partnership interests in the Legal or partnership interests in the Legal ownership or control exercised Person through other means any such trustee have ultimate Person (other than solely in the Person (other than solely in the effective control over the activities through a chain of ownership or (other than solely in the capacity capacity of a Professional Advisor capacity of a Professional Advisor other than direct control) over the of a Professional Advisor or a of the trust (other than solely in the or a Professional Manager)? or a Professional Manager)? management of the Legal Person Professional Manager)? capacity of a Professional Advisor (other than solely in the capacity or a Professional Manager)? See FAQ 8 on directly holding shares, See FAQs 9 to 11 on indirectly See FAQ 17 on "control through of a Professional Advisor or a voting rights or partnership interests. holding shares, voting rights or other means". See FAQ 18 on the See FAQ 18 on the meaning of Professional Professional Manager)? See FAQ 18 on the meaning of Professional partnership interests. See FAQ 18 on meaning of Professional Advisor and Advisor and Professional Manager. See Advisor and Professional Manager. the meaning of Professional Advisor Professional Manager. FAQ 24 in relation to identifying a Senior and Professional Manager. See FAQ 16 on "ultimate effective Managing Official. control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager. Yes. No. Yes. No. Yes. No. Yes. No. Yes. No. Any such individual is a Go to Step 2. Go to Step 4. Go to Step 5. Beneficial Owner. Go to Step 3.



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Step 3 Step 1 Step 2 Step 4 **Direct ownership Indirect ownership Ultimate effective** Control through or control or control control other means Does the Legal Person have any individual who directly holds 25% individual who indirectly holds 25% individual who otherwise exercises individual who is identified as or more of the shares, voting rights or more of the shares, voting rights exercising control of the Legal ultimate effective control (meaning or partnership interests in the Legal or partnership interests in the Legal ownership or control exercised Person through other means Person (other than solely in the Person (other than solely in the through a chain of ownership or (other than solely in the capacity capacity of a Professional Advisor capacity of a Professional Advisor other than direct control) over the of a Professional Advisor or a or a Professional Manager)? or a Professional Manager)? management of the Legal Person Professional Manager)? (other than solely in the capacity See FAQ 8 on directly holding shares, See FAQs 9 to 11 on indirectly See FAQ 17 on "control through of a Professional Advisor or a voting rights or partnership interests. holding shares, voting rights or other means". See FAQ 18 on the Professional Manager)? See FAQ 18 on the meaning of Professional partnership interests. See FAQ 18 on meaning of Professional Advisor and Advisor and Professional Manager. the meaning of Professional Advisor Professional Manager. and Professional Manager. See FAQ 16 on "ultimate effective control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager. Yes. No. Yes. No. Yes. No. Yes. No. Any such individual is a Any such individual is a Go to Step 2. Go to Step 3. Beneficial Owner. Beneficial Owner. No need to consider Step 5. Go to Step 4.



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Step 1 Step 2 Step 3 Step 4 Step 5 Step 6 Does your Legal Person **Direct ownership Indirect ownership** Ultimate effective Control through **Trustees** have any reportable legal or control or control control other means entities ("RLEs")? Does the Legal Person have any Do any trustees of a trust meet one See FAQ 27 on the meaning of RLEs. individual who directly holds 25% individual who indirectly holds 25% individual who otherwise exercises individual who is identified as of the above conditions in relation to the Legal Person? If so, does or more of the shares, voting rights or more of the shares, voting rights ultimate effective control (meaning exercising control of the Legal or partnership interests in the Legal or partnership interests in the Legal ownership or control exercised Person through other means any such trustee have ultimate Person (other than solely in the Person (other than solely in the through a chain of ownership or (other than solely in the capacity effective control over the activities capacity of a Professional Advisor capacity of a Professional Advisor other than direct control) over the of a Professional Advisor or a of the trust (other than solely in the or a Professional Manager)? or a Professional Manager)? management of the Legal Person Professional Manager)? capacity of a Professional Advisor (other than solely in the capacity or a Professional Manager)? See FAQ 8 on directly holding shares, See FAQs 9 to 11 on indirectly See FAQ 17 on "control through of a Professional Advisor or a voting rights or partnership interests. holding shares, voting rights or other means". See FAQ 18 on the See FAQ 18 on the meaning of Professional Professional Manager)? See FAQ 18 on the meaning of Professional partnership interests. See FAQ 18 on meaning of Professional Advisor and Advisor and Professional Manager. See Advisor and Professional Manager. the meaning of Professional Advisor Professional Manager. FAQ 24 in relation to identifying a Senior and Professional Manager. See FAQ 16 on "ultimate effective Managing Official. control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager. Yes. No. Yes. No. Yes. No. Yes. No. Yes. No. Yes. No. Any such individual is a Any such trustee is deemed a Go to Step 2. Go to Step 3. Go to Step 5. No RLEs to report. Beneficial Owner. Beneficial Owner. Go to Step 6. Go to Step 4.



Step 1 Step 2 Step 3 Step 4 Step 5 Step 6 Does your Legal Person **Direct ownership Indirect ownership** Ultimate effective Control through **Trustees** have any reportable legal or control or control control other means entities ("RLEs")? Does the Legal Person have any Do any trustees of a trust meet one See FAQ 27 on the meaning of RLEs. individual who directly holds 25% individual who indirectly holds 25% individual who otherwise exercises individual who is identified as of the above conditions in relation to the Legal Person? If so, does or more of the shares, voting rights or more of the shares, voting rights ultimate effective control (meaning exercising control of the Legal or partnership interests in the Legal or partnership interests in the Legal ownership or control exercised Person through other means any such trustee have ultimate Person (other than solely in the (other than solely in the capacity effective control over the activities Person (other than solely in the through a chain of ownership or other than direct control) over the capacity of a Professional Advisor capacity of a Professional Advisor of a Professional Advisor or a of the trust (other than solely in the or a Professional Manager)? or a Professional Manager)? management of the Legal Person Professional Manager)? capacity of a Professional Advisor (other than solely in the capacity or a Professional Manager)? See FAQ 8 on directly holding shares, See FAQs 9 to 11 on indirectly See FAQ 17 on "control through of a Professional Advisor or a voting rights or partnership interests. holding shares, voting rights or other means". See FAQ 18 on the See FAQ 18 on the meaning of Professional Professional Manager)? See FAQ 18 on the meaning of Professional partnership interests. See FAQ 18 on meaning of Professional Advisor and Advisor and Professional Manager. See Advisor and Professional Manager. the meaning of Professional Advisor Professional Manager. FAQ 24 in relation to identifying a Senior and Professional Manager. See FAQ 16 on "ultimate effective Managing Official. control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager. Yes. No. Yes. No. Yes. No. Yes. No. Yes. No. Yes. No. Any such individual is a Any RLEs must be reported. There is no individual or trustee Go to Step 2. Go to Step 3. Go to Step 5. Beneficial Owner. who meets the definition of a Beneficial Owner so the Legal Go to Step 4. Person's Senior Managing Official shall be identified instead. Go to Step 6.



Step 1 Step 2 Step 3 Step 4 Step 5 Step 6 Does your Legal Person **Direct ownership Indirect ownership** Ultimate effective Control through **Trustees** have any reportable legal or control or control control other means entities ("RLEs")? Does the Legal Person have any Do any trustees of a trust meet one See FAQ 27 on the meaning of RLEs. individual who directly holds 25% individual who indirectly holds 25% individual who otherwise exercises individual who is identified as of the above conditions in relation to the Legal Person? If so, does or more of the shares, voting rights or more of the shares, voting rights ultimate effective control (meaning exercising control of the Legal or partnership interests in the Legal or partnership interests in the Legal ownership or control exercised Person through other means any such trustee have ultimate Person (other than solely in the (other than solely in the capacity effective control over the activities Person (other than solely in the through a chain of ownership or other than direct control) over the capacity of a Professional Advisor capacity of a Professional Advisor of a Professional Advisor or a of the trust (other than solely in the or a Professional Manager)? or a Professional Manager)? management of the Legal Person Professional Manager)? capacity of a Professional Advisor (other than solely in the capacity or a Professional Manager)? See FAQ 8 on directly holding shares, See FAQs 9 to 11 on indirectly See FAQ 17 on "control through of a Professional Advisor or a voting rights or partnership interests. holding shares, voting rights or other means". See FAQ 18 on the See FAQ 18 on the meaning of Professional Professional Manager)? See FAQ 18 on the meaning of Professional partnership interests. See FAQ 18 on meaning of Professional Advisor and Advisor and Professional Manager. See Advisor and Professional Manager. the meaning of Professional Advisor Professional Manager. FAQ 24 in relation to identifying a Senior and Professional Manager. See FAQ 16 on "ultimate effective Managing Official. control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager. Yes. No. Yes. No. Yes. No. Yes. No. Yes. No. Yes. No. Any such individual is a There is no individual or trustee Go to Step 2. Go to Step 3. Go to Step 5. No RLEs to report. Beneficial Owner. who meets the definition of a Beneficial Owner so the Legal Go to Step 4. Person's Senior Managing Official shall be identified instead. Go to Step 6.



Step 1 Step 2 Step 3 Step 4 Step 5 Step 6 Does your Legal Person **Direct ownership Indirect ownership** Ultimate effective Control through **Trustees** have any reportable legal or control or control control other means entities ("RLEs")? Does the Legal Person have any Do any trustees of a trust meet one See FAQ 27 on the meaning of RLEs. individual who directly holds 25% individual who indirectly holds 25% individual who otherwise exercises individual who is identified as of the above conditions in relation or more of the shares, voting rights to the Legal Person? If so, does or more of the shares, voting rights ultimate effective control (meaning exercising control of the Legal or partnership interests in the Legal or partnership interests in the Legal ownership or control exercised Person through other means any such trustee have ultimate Person (other than solely in the Person (other than solely in the through a chain of ownership or (other than solely in the capacity effective control over the activities of the trust (other than solely in the capacity of a Professional Advisor capacity of a Professional Advisor other than direct control) over the of a Professional Advisor or a or a Professional Manager)? or a Professional Manager)? management of the Legal Person Professional Manager)? capacity of a Professional Advisor (other than solely in the capacity or a Professional Manager)? See FAQ 8 on directly holding shares, See FAQs 9 to 11 on indirectly See FAQ 17 on "control through of a Professional Advisor or a voting rights or partnership interests. holding shares, voting rights or other means". See FAQ 18 on the See FAQ 18 on the meaning of Professional Professional Manager)? See FAQ 18 on the meaning of Professional partnership interests. See FAQ 18 on meaning of Professional Advisor and Advisor and Professional Manager. See Advisor and Professional Manager. the meaning of Professional Advisor Professional Manager. FAQ 24 in relation to identifying a Senior and Professional Manager. See FAQ 16 on "ultimate effective Managing Official. control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager. Yes. No. Yes. No. Yes. No. Yes. No. Yes. No. Yes. No. Any such trustee is deemed a Any RLEs must be reported. Go to Step 2. Go to Step 3. Go to Step 4. Go to Step 5. Beneficial Owner. Go to Step 6.



Step 1 Step 2 Step 3 Step 4 Step 5 Step 6 Does your Legal Person **Direct ownership Indirect ownership** Ultimate effective Control through **Trustees** have any reportable legal or control or control control other means entities ("RLEs")? Does the Legal Person have any Do any trustees of a trust meet one See FAQ 27 on the meaning of RLEs. individual who directly holds 25% individual who indirectly holds 25% individual who otherwise exercises individual who is identified as of the above conditions in relation to the Legal Person? If so, does or more of the shares, voting rights or more of the shares, voting rights ultimate effective control (meaning exercising control of the Legal or partnership interests in the Legal or partnership interests in the Legal ownership or control exercised Person through other means any such trustee have ultimate Person (other than solely in the Person (other than solely in the (other than solely in the capacity through a chain of ownership or effective control over the activities of the trust (other than solely in the capacity of a Professional Advisor capacity of a Professional Advisor other than direct control) over the of a Professional Advisor or a or a Professional Manager)? or a Professional Manager)? management of the Legal Person Professional Manager)? capacity of a Professional Advisor (other than solely in the capacity or a Professional Manager)? See FAQ 8 on directly holding shares, See FAQs 9 to 11 on indirectly See FAQ 17 on "control through of a Professional Advisor or a voting rights or partnership interests. holding shares, voting rights or other means". See FAQ 18 on the See FAQ 18 on the meaning of Professional Professional Manager)? See FAQ 18 on the meaning of Professional partnership interests. See FAQ 18 on meaning of Professional Advisor and Advisor and Professional Manager. See Advisor and Professional Manager. the meaning of Professional Advisor Professional Manager. FAQ 24 in relation to identifying a Senior and Professional Manager. See FAQ 16 on "ultimate effective Managing Official. control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager. Yes. No. Yes. No. Yes. No. Yes. No. Yes. No. Yes. No. Any such trustee is deemed a Go to Step 2. Go to Step 3. Go to Step 4. Go to Step 5. No RLEs to report. Beneficial Owner. Go to Step 6.



Step 1 Step 2 Step 3 Step 4 Step 5 Step 6 Does your Legal Person **Direct ownership Indirect ownership** Ultimate effective Control through **Trustees** have any reportable legal or control or control control other means entities ("RLEs")? Does the Legal Person have any Do any trustees of a trust meet one See FAQ 27 on the meaning of RLEs. individual who directly holds 25% individual who indirectly holds 25% individual who otherwise exercises individual who is identified as of the above conditions in relation to the Legal Person? If so, does or more of the shares, voting rights or more of the shares, voting rights ultimate effective control (meaning exercising control of the Legal or partnership interests in the Legal or partnership interests in the Legal ownership or control exercised Person through other means any such trustee have ultimate Person (other than solely in the Person (other than solely in the through a chain of ownership or (other than solely in the capacity effective control over the activities of the trust (other than solely in the capacity of a Professional Advisor capacity of a Professional Advisor other than direct control) over the of a Professional Advisor or a or a Professional Manager)? or a Professional Manager)? management of the Legal Person Professional Manager)? capacity of a Professional Advisor (other than solely in the capacity or a Professional Manager)? See FAQ 8 on directly holding shares, See FAQs 9 to 11 on indirectly See FAQ 17 on "control through of a Professional Advisor or a voting rights or partnership interests. holding shares, voting rights or other means". See FAQ 18 on the See FAQ 18 on the meaning of Professional Professional Manager)? See FAQ 18 on the meaning of Professional partnership interests. See FAQ 18 on meaning of Professional Advisor and Advisor and Professional Manager. See Advisor and Professional Manager. the meaning of Professional Advisor Professional Manager. FAQ 24 in relation to identifying a Senior and Professional Manager. See FAQ 16 on "ultimate effective Managing Official. control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager. Yes. No. Yes. No. Yes. No. Yes. No. Yes. No. Yes. No. Any RLEs must be reported. There is no individual or trustee Go to Step 2. Go to Step 3. Go to Step 4. Go to Step 5. who meets the definition of a Beneficial Owner so the Legal Person's Senior Managing Official shall be identified instead. Go to Step 6.



Step 1 Step 2 Step 3 Step 4 Step 5 Step 6 Does your Legal Person **Direct ownership Indirect ownership** Ultimate effective Control through **Trustees** have any reportable legal or control or control control other means entities ("RLEs")? Does the Legal Person have any Do any trustees of a trust meet one See FAQ 27 on the meaning of RLEs. individual who directly holds 25% individual who indirectly holds 25% individual who otherwise exercises individual who is identified as of the above conditions in relation to the Legal Person? If so, does or more of the shares, voting rights or more of the shares, voting rights ultimate effective control (meaning exercising control of the Legal or partnership interests in the Legal or partnership interests in the Legal ownership or control exercised Person through other means any such trustee have ultimate Person (other than solely in the effective control over the activities Person (other than solely in the through a chain of ownership or (other than solely in the capacity other than direct control) over the capacity of a Professional Advisor capacity of a Professional Advisor of a Professional Advisor or a of the trust (other than solely in the or a Professional Manager)? or a Professional Manager)? management of the Legal Person Professional Manager)? capacity of a Professional Advisor (other than solely in the capacity or a Professional Manager)? See FAQ 8 on directly holding shares, See FAQs 9 to 11 on indirectly See FAQ 17 on "control through of a Professional Advisor or a voting rights or partnership interests. holding shares, voting rights or other means". See FAQ 18 on the See FAQ 18 on the meaning of Professional Professional Manager)? See FAQ 18 on the meaning of Professional partnership interests. See FAQ 18 on meaning of Professional Advisor and Advisor and Professional Manager. See Advisor and Professional Manager. the meaning of Professional Advisor Professional Manager. FAQ 24 in relation to identifying a Senior and Professional Manager. See FAQ 16 on "ultimate effective Managing Official. control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager. Yes. No. Yes. No. Yes. No. Yes. No. Yes. No. Yes. No. There is no individual or trustee Go to Step 2. Go to Step 3. Go to Step 4. Go to Step 5. No RLEs to report. who meets the definition of a Beneficial Owner so the Legal Person's Senior Managing Official shall be identified instead. Go to Step 6.



Step 1

Direct ownership or control

Does the Legal Person have any individual who directly holds 25% or more of the shares, voting rights or partnership interests in the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQ 8 on directly holding shares, voting rights or partnership interests.
See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Step 2

Indirect ownership or control

Does the Legal Person have any individual who indirectly holds 25% or more of the shares, voting rights or partnership interests in the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQs 9 to 11 on indirectly holding shares, voting rights or partnership interests. See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Step 3

Ultimate effective control

Does the Legal Person have any individual who otherwise exercises ultimate effective control (meaning ownership or control exercised through a chain of ownership or other than direct control) over the management of the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQ 16 on "ultimate effective control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Any such individual is a Beneficial Owner.

Go to Step 2.

No.

Yes.

No.

Any such individual is a Beneficial Owner.

Go to Step 3.

Yes.

No.



Step 1

Direct ownership or control

Does the Legal Person have any individual who directly holds 25% or more of the shares, voting rights or partnership interests in the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQ 8 on directly holding shares, voting rights or partnership interests.
See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Step 2

Indirect ownership or control

Does the Legal Person have any individual who indirectly holds 25% or more of the shares, voting rights or partnership interests in the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQs 9 to 11 on indirectly holding shares, voting rights or partnership interests. See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Step 3

Ultimate effective control

Does the Legal Person have any individual who otherwise exercises ultimate effective control (meaning ownership or control exercised through a chain of ownership or other than direct control) over the management of the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQ 16 on "ultimate effective control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Step 4

Control through other means

Does the Legal Person have any individual who is identified as exercising control of the Legal Person through other means (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQ 17 on "control through other means". See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Yes. No.

Any such individual is a

Any such individual is a Beneficial Owner.

Go to Step 2.

Yes. No.

Any such individual is a

Beneficial Owner. **Go to Step 3.**

Yes. No.

Any such individual is a Beneficial Owner.

Go to Step 4.

Yes.

No.



Step 1

or control

Direct ownership

Does the Legal Person have any individual who directly holds 25% or more of the shares, voting rights or partnership interests in the Legal Person (other than solely in the

capacity of a Professional Advisor

or a Professional Manager)?

See FAQ 8 on directly holding shares, voting rights or partnership interests.
See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Step 2

Indirect ownership or control

Does the Legal Person have any individual who indirectly holds 25% or more of the shares, voting rights or partnership interests in the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQs 9 to 11 on indirectly holding shares, voting rights or partnership interests. See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

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See FAQ 16 on "ultimate effective control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

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See FAQ 17 on "control through other means". See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Any such individual is a

Any such individual is a Beneficial Owner.

Go to Step 2.

Yes. No.

Any such individual is a

Beneficial Owner. **Go to Step 3.**

Any such individual is a Beneficial Owner.

Go to Step 4.

Any such individual is a Beneficial Owner.

No need to consider Step 5.



Step 1

Direct ownership or control

Does the Legal Person have any individual who directly holds 25% or more of the shares, voting rights or partnership interests in the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQ 8 on directly holding shares, voting rights or partnership interests.
See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Step 2

Indirect ownership or control

Does the Legal Person have any individual who indirectly holds 25% or more of the shares, voting rights or partnership interests in the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQs 9 to 11 on indirectly holding shares, voting rights or partnership interests. See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Step 3

Ultimate effective control

Does the Legal Person have any individual who otherwise exercises ultimate effective control (meaning ownership or control exercised through a chain of ownership or other than direct control) over the management of the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQ 16 on "ultimate effective control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Any such individual is a Beneficial Owner.

Go to Step 2.



Yes.

No.



Step 2 Step 3 Step 1 Step 4 **Direct ownership Indirect ownership** Ultimate effective Control through or control or control control other means Does the Legal Person have any individual who directly holds 25% individual who indirectly holds 25% individual who otherwise exercises individual who is identified as or more of the shares, voting rights or more of the shares, voting rights ultimate effective control (meaning exercising control of the Legal or partnership interests in the Legal or partnership interests in the Legal ownership or control exercised Person through other means Person (other than solely in the Person (other than solely in the through a chain of ownership or (other than solely in the capacity capacity of a Professional Advisor capacity of a Professional Advisor other than direct control) over the of a Professional Advisor or a or a Professional Manager)? or a Professional Manager)? management of the Legal Person Professional Manager)? (other than solely in the capacity See FAQ 8 on directly holding shares, See FAQs 9 to 11 on indirectly See FAQ 17 on "control through of a Professional Advisor or a voting rights or partnership interests. holding shares, voting rights or other means". See FAQ 18 on the Professional Manager)? See FAQ 18 on the meaning of Professional partnership interests. See FAQ 18 on meaning of Professional Advisor and Advisor and Professional Manager. the meaning of Professional Advisor Professional Manager. and Professional Manager. See FAQ 16 on "ultimate effective control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager. Yes. No. Yes. No. Yes. No. Yes. No. Any such individual is a Any such individual is a Go to Step 3. Beneficial Owner. Beneficial Owner. Go to Step 2. Go to Step 4.



Direct ownership or control

Does the Legal Person have any individual who directly holds 25% or more of the shares, voting rights or partnership interests in the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQ 8 on directly holding shares, voting rights or partnership interests.
See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Step 2

Indirect ownership or control

Does the Legal Person have any individual who indirectly holds 25% or more of the shares, voting rights or partnership interests in the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQs 9 to 11 on indirectly holding shares, voting rights or partnership interests. See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Step 3

Ultimate effective control

Does the Legal Person have any individual who otherwise exercises ultimate effective control (meaning ownership or control exercised through a chain of ownership or other than direct control) over the management of the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQ 16 on "ultimate effective control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Go to Step 4.

Step 4

Control through other means

Does the Legal Person have any individual who is identified as exercising control of the Legal Person through other means (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQ 17 on "control through other means". See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Yes.

Any such individual is a Beneficial Owner.

Go to Step 2.

Yes. No.

Yes. No.

Any such individual is a Beneficial Owner.

Any such individual is a Beneficial Owner.

No need to consider Step 5.

No.



Step 2 Step 3 Step 1 Step 4 **Direct ownership Indirect ownership** Ultimate effective Control through or control or control control other means Does the Legal Person have any individual who directly holds 25% individual who indirectly holds 25% individual who otherwise exercises individual who is identified as or more of the shares, voting rights or more of the shares, voting rights ultimate effective control (meaning exercising control of the Legal or partnership interests in the Legal or partnership interests in the Legal ownership or control exercised Person through other means Person (other than solely in the Person (other than solely in the through a chain of ownership or (other than solely in the capacity capacity of a Professional Advisor capacity of a Professional Advisor other than direct control) over the of a Professional Advisor or a or a Professional Manager)? or a Professional Manager)? management of the Legal Person Professional Manager)? (other than solely in the capacity See FAQ 8 on directly holding shares, See FAQs 9 to 11 on indirectly See FAQ 17 on "control through of a Professional Advisor or a voting rights or partnership interests. holding shares, voting rights or other means". See FAQ 18 on the Professional Manager)? See FAQ 18 on the meaning of Professional partnership interests. See FAQ 18 on meaning of Professional Advisor and Advisor and Professional Manager. the meaning of Professional Advisor Professional Manager. and Professional Manager. See FAQ 16 on "ultimate effective control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager. Yes. No. Yes. No. Yes. No. Yes. No. Any such individual is a Go to Step 3. Go to Step 4. Beneficial Owner. Go to Step 2.



Direct ownership or control

Does the Legal Person have any individual who directly holds 25% or more of the shares, voting rights or partnership interests in the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQ 8 on directly holding shares, voting rights or partnership interests. See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Step 2

Indirect ownership or control

Does the Legal Person have any individual who indirectly holds 25% or more of the shares, voting rights or partnership interests in the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQs 9 to 11 on indirectly holding shares, voting rights or partnership interests. See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Ultimate effective

control

Step 3

Does the Legal Person have any individual who otherwise exercises ultimate effective control (meaning ownership or control exercised through a chain of ownership or other than direct control) over the management of the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQ 16 on "ultimate effective control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Step 4

Control through other means

Does the Legal Person have any individual who is identified as exercising control of the Legal Person through other means (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQ 17 on "control through other means". See FAQ 18 on the meaning of Professional Advisor and Professional Manager.











Step 1 Step 2 Step 3 Step 4 Step 5 **Direct ownership Indirect ownership** Ultimate effective Control through **Trustees** or control or control control other means Does the Legal Person have any Do any trustees of a trust meet one individual who directly holds 25% individual who indirectly holds 25% individual who otherwise exercises individual who is identified as of the above conditions in relation or more of the shares, voting rights or more of the shares, voting rights to the Legal Person? If so, does ultimate effective control (meaning exercising control of the Legal or partnership interests in the Legal or partnership interests in the Legal ownership or control exercised Person through other means any such trustee have ultimate Person (other than solely in the Person (other than solely in the through a chain of ownership or (other than solely in the capacity effective control over the activities capacity of a Professional Advisor capacity of a Professional Advisor other than direct control) over the of a Professional Advisor or a of the trust (other than solely in the or a Professional Manager)? or a Professional Manager)? management of the Legal Person Professional Manager)? capacity of a Professional Advisor (other than solely in the capacity or a Professional Manager)? See FAQ 8 on directly holding shares, See FAQs 9 to 11 on indirectly See FAQ 17 on "control through of a Professional Advisor or a voting rights or partnership interests. holding shares, voting rights or other means". See FAQ 18 on the See FAQ 18 on the meaning of Professional Professional Manager)? See FAQ 18 on the meaning of Professional partnership interests. See FAQ 18 on meaning of Professional Advisor and Advisor and Professional Manager. See Advisor and Professional Manager. the meaning of Professional Advisor Professional Manager. FAQ 24 in relation to identifying a Senior and Professional Manager. See FAQ 16 on "ultimate effective Managing Official. control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager. Yes. No. Yes. No. Yes. No. Yes. No. Yes. No. Any such individual is a Go to Step 3. Go to Step 4. Go to Step 5. Beneficial Owner. Go to Step 2.



Step 1 Step 2 Step 3 Step 4 Step 5 Step 6 Does your Legal Person **Direct ownership Indirect ownership** Ultimate effective Control through **Trustees** have any reportable legal or control or control control other means entities ("RLEs")? Does the Legal Person have any Do any trustees of a trust meet one See FAQ 27 on the meaning of RLEs. individual who directly holds 25% individual who indirectly holds 25% individual who otherwise exercises individual who is identified as of the above conditions in relation or more of the shares, voting rights or more of the shares, voting rights to the Legal Person? If so, does ultimate effective control (meaning exercising control of the Legal or partnership interests in the Legal or partnership interests in the Legal ownership or control exercised Person through other means any such trustee have ultimate Person (other than solely in the Person (other than solely in the through a chain of ownership or (other than solely in the capacity effective control over the activities capacity of a Professional Advisor capacity of a Professional Advisor other than direct control) over the of a Professional Advisor or a of the trust (other than solely in the or a Professional Manager)? or a Professional Manager)? management of the Legal Person Professional Manager)? capacity of a Professional Advisor (other than solely in the capacity or a Professional Manager)? See FAQ 8 on directly holding shares, See FAQs 9 to 11 on indirectly See FAQ 17 on "control through of a Professional Advisor or a voting rights or partnership interests. holding shares, voting rights or other means". See FAQ 18 on the See FAQ 18 on the meaning of Professional Professional Manager)? See FAQ 18 on the meaning of Professional partnership interests. See FAQ 18 on meaning of Professional Advisor and Advisor and Professional Manager. See Advisor and Professional Manager. the meaning of Professional Advisor Professional Manager. FAQ 24 in relation to identifying a Senior and Professional Manager. See FAQ 16 on "ultimate effective Managing Official. control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager. Yes. No. Yes. No. Yes. No. Yes. No. Yes. No. Yes. No. Any such individual is a Any such trustee is deemed a Go to Step 3. Go to Step 4. Go to Step 5. Beneficial Owner. Beneficial Owner. Go to Step 2. Go to Step 6.



Step 1 Step 2 Step 3 Step 4 Step 5 Step 6 Does your Legal Person **Direct ownership Indirect ownership** Ultimate effective Control through **Trustees** have any reportable legal or control or control control other means entities ("RLEs")? Does the Legal Person have any Do any trustees of a trust meet one See FAQ 27 on the meaning of RLEs. individual who directly holds 25% individual who indirectly holds 25% individual who otherwise exercises individual who is identified as of the above conditions in relation to the Legal Person? If so, does or more of the shares, voting rights or more of the shares, voting rights ultimate effective control (meaning exercising control of the Legal or partnership interests in the Legal or partnership interests in the Legal ownership or control exercised Person through other means any such trustee have ultimate Person (other than solely in the Person (other than solely in the (other than solely in the capacity through a chain of ownership or effective control over the activities capacity of a Professional Advisor capacity of a Professional Advisor other than direct control) over the of a Professional Advisor or a of the trust (other than solely in the or a Professional Manager)? or a Professional Manager)? management of the Legal Person Professional Manager)? capacity of a Professional Advisor (other than solely in the capacity or a Professional Manager)? See FAQ 8 on directly holding shares, See FAQs 9 to 11 on indirectly See FAQ 17 on "control through of a Professional Advisor or a voting rights or partnership interests. holding shares, voting rights or other means". See FAQ 18 on the See FAQ 18 on the meaning of Professional Professional Manager)? See FAQ 18 on the meaning of Professional partnership interests. See FAQ 18 on meaning of Professional Advisor and Advisor and Professional Manager. See Advisor and Professional Manager. the meaning of Professional Advisor Professional Manager. FAQ 24 in relation to identifying a Senior and Professional Manager. See FAQ 16 on "ultimate effective Managing Official. control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager. Yes. No. Yes. No. Yes. No. Yes. No. Yes. No. Yes. No. Any such individual is a There is no individual or trustee Go to Step 3. Go to Step 4. Go to Step 5. Beneficial Owner. who meets the definition of a Beneficial Owner so the Legal Go to Step 2. Person's Senior Managing Official shall be identified instead. Go to Step 6.



Direct ownership or control

Does the Legal Person have any individual who directly holds 25%

individual who directly holds 25% or more of the shares, voting rights or partnership interests in the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQ 8 on directly holding shares, voting rights or partnership interests.
See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Step 2

Indirect ownership or control

Does the Legal Person have any individual who indirectly holds 25% or more of the shares, voting rights or partnership interests in the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQs 9 to 11 on indirectly holding shares, voting rights or partnership interests. See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

No.

Step 3

Ultimate effective control

Does the Legal Person have any individual who otherwise exercises ultimate effective control (meaning ownership or control exercised through a chain of ownership or other than direct control) over the management of the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQ 16 on "ultimate effective control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Step 4

Control through other means

Does the Legal Person have any individual who is identified as exercising control of the Legal Person through other means (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

See FAQ 17 on "control through other means". See FAQ 18 on the meaning of Professional Advisor and Professional Manager.

Yes. No.

Any such individual is a Beneficial Owner.

Go to Step 2.

Any such individual is a Beneficial Owner. **Go to Step 3.**

Yes.



Yes. No.

Step 1

Direct ownership or control

Does the Legal Person have any

individual who directly holds 25% or more of the shares, voting rights or partnership interests in the Legal Person (other than solely in the capacity of a Professional Advisor or a Professional Manager)?

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Step 2

Indirect ownership or control

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See FAQ 17 on "control through other means". See FAQ 18 on the meaning of Professional Advisor and Professional Manager.





No.

Yes.





Step 1 Step 2 Step 3 Step 4 Step 5 **Direct ownership Indirect ownership** Ultimate effective Control through **Trustees** or control or control control other means Does the Legal Person have any Do any trustees of a trust meet one individual who directly holds 25% individual who indirectly holds 25% individual who otherwise exercises individual who is identified as of the above conditions in relation or more of the shares, voting rights or more of the shares, voting rights to the Legal Person? If so, does ultimate effective control (meaning exercising control of the Legal or partnership interests in the Legal or partnership interests in the Legal ownership or control exercised Person through other means any such trustee have ultimate Person (other than solely in the Person (other than solely in the through a chain of ownership or (other than solely in the capacity effective control over the activities of the trust (other than solely in the capacity of a Professional Advisor capacity of a Professional Advisor other than direct control) over the of a Professional Advisor or a or a Professional Manager)? or a Professional Manager)? management of the Legal Person Professional Manager)? capacity of a Professional Advisor (other than solely in the capacity or a Professional Manager)? See FAQ 8 on directly holding shares, See FAQs 9 to 11 on indirectly See FAQ 17 on "control through of a Professional Advisor or a voting rights or partnership interests. holding shares, voting rights or other means". See FAQ 18 on the See FAQ 18 on the meaning of Professional Professional Manager)? See FAQ 18 on the meaning of Professional partnership interests. See FAQ 18 on meaning of Professional Advisor and Advisor and Professional Manager. See Advisor and Professional Manager. the meaning of Professional Advisor Professional Manager. FAQ 24 in relation to identifying a Senior and Professional Manager. See FAQ 16 on "ultimate effective Managing Official. control". See FAQ 18 on the meaning of Professional Advisor and Professional Manager. Yes. No. Yes. No. Yes. No. Yes. No. Yes. No. Any such individual is a Any such individual is a Go to Step 4. Go to Step 5. Beneficial Owner. Beneficial Owner. Go to Step 2. Go to Step 3.



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