

| Customer details   |                                    |
|--|------------------------------------|
| Official name of entity  | Business ID                        |
| Registered address   | Post code and town/city            |
| Address of the primary location, if other than registered address* | Post code and town/city            |
| Email address of contact person                                    | Telephone number of contact person |

\* The primary location refers to the address where most of the company's business is performed or led, for example, where the senior management personnel are located. The primary location may also be the same place as the official address in the official company registers.

| Background information   |
|--|
| <p>Mandatum is required to identify its clients and to be sufficiently familiar with its clients' backgrounds. Mandatum uses the requested information to prevent money laundering and the funding of terrorism and to meet the statutory obligations concerning the exchanging of tax information. Read more about client identification at <a href="http://www.mandatum.fi/knowyourcustomer">www.mandatum.fi/knowyourcustomer</a> and the processing of personal data at <a href="http://www.mandatum.fi/en/privacy-policy">www.mandatum.fi/en/privacy-policy</a>. Please fill in this form carefully.</p>   |
| <p><b>1. Is your entity a financial institution?</b></p> <p><input type="checkbox"/> Yes (answer section 1.1.)</p> <p><input type="checkbox"/> No (skip to section 1.2.)</p> <p><i>Financial institution refers to a custodian or depository institution, an investment entity or a specified insurance company.</i></p>   |
| <p><b>1.1. The entity is a financial institution:</b></p> <p>The entity's Global Intermediary Identification Number (GIIN): _____</p> <p>If you are unable to provide the GIIN, state the reason why in section 5, "Additional information".</p> <p><i>The GIIN is a Global Intermediary Identification Number granted by the United States' tax administration (the IRS) to foreign financial institutions. The GIIN indicates that the financial institution meets its FATCA obligations.</i></p>  |
| <p><b>1.2. The entity is not a financial institution:</b></p> <p>If the entity is not a financial institution, it is considered to be a Non-Financial Entity.*</p> <p>Provide your entity's status in accordance with the FATCA and CRS regulations:</p> <p><input type="checkbox"/> Active Non-Financial Entity<br/>(entity whose income mainly comes from activities other than investments, e.g. trade and/or services).</p> <p><input type="checkbox"/> Passive Non-Financial Entity<br/>(entity whose income mainly comes from investments, e.g. entities that do not have significant active production of goods and/or services)</p> <p>* for more detailed instructions, see the end of the form</p>   |
| <p><b>2. In which country is your entity a tax resident?*</b></p> <p><input type="checkbox"/> Finland</p> <p><input type="checkbox"/> U.S.A.** Taxpayer Identification Nr: _____</p> <p><input type="checkbox"/> Other country Taxation country: _____ Taxpayer Identification Nr: _____</p> <p>Taxation country: _____ Taxpayer Identification Nr: _____</p> <p>* The entity's tax residency, i.e. where it is subject to unlimited tax liability, is usually determined according to the entity's place of establishment or place of organisation. The foreign Taxpayer Identification Number is required information if the entity is subject to taxation outside of Finland. If the entity does not have a Taxpayer Identification Number for the country in question, please state the reason why in section 5, "Additional information". Every country's national legislation lays down the conditions according to which entities are treated as subject to tax. Engaging in business through a fixed business location situated in another state may entail an obligation to pay taxes in that state.</p> <p>** The tax liability can arise, for example, if the entity has an address or branch in the U.S.A. If the entity is subject to taxation in the U.S.A., the Taxpayer Identification Number must be included or the IRS's Form W-9 must be filled in and returned (retrieve the form at <a href="http://www.irs.gov">www.irs.gov</a>).</p> |

**3. Description of the ownership structure of the entity (only private limited liability companies):**

Submit information about the company's ownership structure or attach a description of the ownership structure, including holdings.

- For owning persons and entities, the persons or entities who own, either directly or indirectly, more than 25% of the company are submitted.
- If the ownership is diversified (i.e. no individual person or entity directly owns more than 25%), attach a description of the ownership structure.
- If control in the company does not conform to the ownership structure, submit the control structure instead of the ownership structure.

The company name, Business ID (or registration number [Business ID], if the company is not Finnish), address and percentage of ownership in the entity must be reported for an owning legal entity.

Description of ownership structure as an attachment (mandatory if the ownership or control of the beneficial owner is indirect)

| Name of owning person | National identity number | Address (incl. country) | Holding (%)* |
|-----------------------|--------------------------|-------------------------|--------------|
|                       |                          |                         |              |
|                       |                          |                         |              |
|                       |                          |                         |              |
|                       |                          |                         |              |
| Name of owning entity | Business ID              | Address (incl. country) | Holding (%)  |
|                       |                          |                         |              |
|                       |                          |                         |              |

**4. Beneficial owners of the entity (doesn't apply to stock-exchange-listed companies, municipalities, cities, municipal public utilities, universities, the evangelical lutheran and orthodox church)**

A beneficial owner/Beneficial owners must always be named for the entity (excl. stock-exchange-listed companies, municipalities, cities, municipal public utilities, universities, the evangelical lutheran and orthodox church).

The beneficial owner is a natural person who has control in the entity. The person's control arises, e.g., if he/she owns or controls more than 25 per cent of the voting rights carried by the entity's shares or participations, or has the right to appoint or dismiss a majority of the members of the entity's board of directors (or a comparable body).

The beneficial owner can exercise control either directly or indirectly\* through one or more companies or entities.

**Limited liability company**

If another company owns more than 25% of the company, the beneficial owner is the natural person who owns more than 50% of a company that belongs to the chain of ownership (indirect ownership). Indirect ownership may also arise if several companies together own more than 25% of the client company's shares (e.g. all companies own 10%) and the same natural person owns more than 50% of the shares of these companies.

If no individual natural person owns more than 25% directly or indirectly, the company itself shall stipulate who can exercise control in the company. Generally, members of the board of directors, the managing director or other persons holding similar positions are considered the beneficial owners.

**General partnership and limited partnership**

In a general partnership, beneficial owners are considered to be the partners, and in a limited partnership, beneficial owners are the active partner(s).

**Foundations**

The beneficial owners of a foundation are the members of both the board of directors and the supervisory board. If a foundation does not have a supervisory board, the foundation's beneficial owners are considered to be the members of the board of directors.

**Associations, religious communities, housing co-operatives and property companies**

The members of the board of directors are considered to be the beneficial owners.

**Other entities**

The persons exercising control in the entity, for example the members of the board of directors are considered to be the beneficial owners.

\* for more detailed instructions, see the end of the form

**Beneficial owners' details: (There are more fields at the end of the form)**

|   | Beneficial owner   | Beneficial owner   | Beneficial owner   |
|---|--|--|--|
| Name                                      |  |  |  |
| National identity number*                 |  |  |  |
| Country of birth                          |  |  |  |
| Citizenship**                             |  |  |  |
| Country of taxation***                    |  |  |  |
| Taxpayer Identification Number (TIN) **** |  |  |  |
| Politically exposed person *****          | <input type="checkbox"/> No <input type="checkbox"/> Yes | <input type="checkbox"/> No <input type="checkbox"/> Yes | <input type="checkbox"/> No <input type="checkbox"/> Yes |
| Holding                                   | _____ %  | _____ %  | _____ %  |

\* If the beneficial owner does not have a Finnish Social Security Number, a copy of this person's passport must be appended to the form.

\*\* A person born in the United States is primarily a US tax resident. If you are not a US tax resident despite of United States being the beneficial owner's country of birth, provide this information in section 5, "Additional information". A US citizen (also dual or triple citizenship) is a US tax resident despite of the place of residence. US tax residency can also arise from a residence permit, work permit (Green Card) or permanent place of residence.

\*\*\* Mandatum has an obligation to know where the entity's beneficial owners are tax resident. Tax residency is usually determined according to the person's main place of residence or similar residence.

\*\*\*\* Must be reported if both of the following conditions are met: in section 1.2, "Passive Non-Financial Entity (whose income mainly comes from investments)" was selected and the beneficial owner's country of taxation is other than Finland. In this case the foreign Tax Identification Number (TIN) is required information.

More information is available at: [www.vero.fi](http://www.vero.fi).

\*\*\*\*\* Is the beneficial owner (or his/her family member or business partner) a politically exposed person (a high-standing official or holding an important political position)? If the answer is yes, provide more details about the matter in section 5, "Additional information".

More information about the processing of personal data is available at [www.mandatum.fi/en/privacy-policy](http://www.mandatum.fi/en/privacy-policy).

**5. Additional information**

**Signature**

|  |   |
|--|---|
| Place and Date<br><br>_____<br><br>_____ | We confirm that the information we have given is correct. We undertake to report without delay any changes that may occur in the information we have given.   |
|  | Signature   |
|  | Name in block letters   |
|  | The undersigned is a person who has the right to sign on behalf of the company (If the company's authority to sign documents requires two persons, one person's signature is sufficient) or is entitled to represent the company due to their position. |

**Identification (To be filled in by Mandatum's contact person)**

**The entity has been identified through:**

- Extract from trade register
- Extract from foundation register
- Other register \_\_\_\_\_

**The private customer and the person acting on behalf of an institutional customer have been identified through:**

Name and national identity number: \_\_\_\_\_

|  |  |
|--|--|
| <input type="checkbox"/> Driving licence     | <input type="checkbox"/> A copy of the identification document <b>or</b> |
| <input type="checkbox"/> Passport            | <input type="checkbox"/> The grantor of the identification document      |
| <input type="checkbox"/> Identification card | _____  |
|  | and number _____   |

**Return to**

Attach a copy of a document proving the identity of the undersigned, such as passport, identification card or driving licence.

Mandatum Life Insurance Company Limited, Asiakasposti/2011,  
Kalevantie 3, 20520 Turku

**Mandatum customer service**

Tel. 0200 31190 (Inc/mnc)

| Beneficial owners' details:               |  |  |  |
|---|--|--|--|
|   | Beneficial owner   | Beneficial owner   | Beneficial owner   |
| Name                                      |  |  |  |
| National identity number*                 |  |  |  |
| Country of birth                          |  |  |  |
| Citizenship**                             |  |  |  |
| Country of taxation***                    |  |  |  |
| Taxpayer Identification Number (TIN) **** |  |  |  |
| Politically exposed person*****           | <input type="checkbox"/> No <input type="checkbox"/> Yes | <input type="checkbox"/> No <input type="checkbox"/> Yes | <input type="checkbox"/> No <input type="checkbox"/> Yes |
| Holding                                   | _____ %  | _____ %  | _____ %  |

| Beneficial owners' details:               |  |  |  |
|---|--|--|--|
|   | Beneficial owner   | Beneficial owner   | Beneficial owner   |
| Name                                      |  |  |  |
| National identity number*                 |  |  |  |
| Country of birth                          |  |  |  |
| Citizenship**                             |  |  |  |
| Country of taxation***                    |  |  |  |
| Taxpayer Identification Number (TIN) **** |  |  |  |
| Politically exposed person*****           | <input type="checkbox"/> No <input type="checkbox"/> Yes | <input type="checkbox"/> No <input type="checkbox"/> Yes | <input type="checkbox"/> No <input type="checkbox"/> Yes |
| Holding                                   | _____ %  | _____ %  | _____ %  |

| Beneficial owners' details:               |  |  |  |
|---|--|--|--|
|   | Beneficial owner   | Beneficial owner   | Beneficial owner   |
| Name                                      |  |  |  |
| National identity number*                 |  |  |  |
| Country of birth                          |  |  |  |
| Citizenship**                             |  |  |  |
| Country of taxation***                    |  |  |  |
| Taxpayer Identification Number (TIN) **** |  |  |  |
| Politically exposed person*****           | <input type="checkbox"/> No <input type="checkbox"/> Yes | <input type="checkbox"/> No <input type="checkbox"/> Yes | <input type="checkbox"/> No <input type="checkbox"/> Yes |
| Holding                                   | _____ %  | _____ %  | _____ %  |

\* If the beneficial owner does not have a Finnish Social Security Number, a copy of this person's passport must be appended to the form.  
 \*\* A person born in the United States is primarily a US tax resident. If you are not a US tax resident despite of United States being the beneficial owner's country of birth, provide this information in section 5, "Additional information". A US citizen (also dual or triple citizenship) is a US tax resident despite of the place of residence. US tax residency can also arise from a residence permit, work permit (Green Card) or permanent place of residence.  
 \*\*\* Mandatum has an obligation to know where the entity's beneficial owners are tax resident. Tax residency is usually determined according to the person's main place of residence or similar residence.  
 \*\*\*\* Must be reported if both of the following conditions are met: in section 1.2, "Passive Non-Financial Entity (whose income mainly comes from investments)" was selected and the beneficial owner's country of taxation is other than Finland. In this case the foreign Tax Identification Number (TIN) is required information.  
 More information is available at: [www.vero.fi](http://www.vero.fi).  
 \*\*\*\*\* Is the beneficial owner (or his/her family member or business partner) a politically exposed person (a high-standing official or holding an important political position)? If the answer is yes, provide more details about the matter in section 5, "Additional information".  
 More information about the processing of personal data is available at [www.mandatum.fi/en/privacy-policy](http://www.mandatum.fi/en/privacy-policy).

## Background information

Mandatum has a legal obligation to identify and know its customers. Mandatum must know, for example, the financial position, ownership structure and beneficial owners of its institutional customers. By providing us with the information we need, you are helping to fight crime and bearing your social responsibility. All of the information you provide will be kept confidential.

The obligation to identify customers is based on the Finnish Act on Detecting and Preventing Money Laundering and Terrorist Financing, and the Financial Supervisory Authority's regulations and guidelines. Mandatum is additionally obligated by international tax regulations (FATCA, CRS and DAC2) to identify customers whose country of taxation is other than Finland.

### 1. Financial institution

Financial institution refers to a custodian or depository institution, an investment entity or a specified insurance company. Financial institution also means an entity that practices (or another operator that governs that entity practices) one or more of the following activities in its business activities on behalf of a customer:

- securities trading or trading with other financial instruments;
- individual or collective portfolio management; or
- otherwise invests, administers or manages financial assets or other assets

### 2. Active non-financial entity

Entities classified as non-financial entities are those whose previous calendar year's (or similar reporting period's)

- gross earnings mainly consist of business, for example, trade and/or services, and less than half of the gross income consists of so-called passive income<sup>1</sup>, and
- assets are, for less than half, made up of assets that produce or which are intended to produce so-called passive income.

Active non-financial entities include:

- entities whose income mainly comes from activities other than investments (for more detailed description, see above)
- listed companies or their related entities<sup>2</sup>
- start-up companies for the first two years
- companies that are bankrupt
- holding companies or corporate financial centres whose operations mainly consist of managing the share capital (or part of it) of related entities or offering financing and hedging services to related entities that are not financial institutions
- non-profit organisations
- governmental organisations, international organisations and central banks
- labor unions and unemployment funds
- universities, universities of applied sciences and other equivalent educational institutions
- evangelical lutheran and orthodox church

- 1) Passive income can consist of dividends, interest, rental income and royalties, annuities, a life insurance death benefit, other insurance income, passive income from profit gained from the sale of assets, profit from the sale of raw materials and profit from the sale of currency and derivatives.
- 2) A unit is considered a related entity of another unit if one of the units controls the other or if both units are under joint control.

### 3. Passive non-financial entity

Entities other than financial institutions or active non-financial entities are classified as passive non-financial entities. Most of the revenue from passive non-financial entities is generated from passive income, i.e. essentially from investments. Passive non-financial entities do not have any significant active production of goods and/or services.

### 4. Politically exposed person

Mandatum is also under obligation to determine whether its customer, beneficiary or its institutional customer's beneficial owner is a politically exposed person.

A person is politically exposed if he/she holds or has held an important public function within one year. Such a person's inner circle (e.g. spouse, children, parents, business partners) are also considered politically exposed.

A politically exposed person is considered to be Finland's or another state's:

- heads of state
- ministers
- members of parliament
- members of a political party's governing body
- members of the highest courts, constitutional court or other similar legal body
- members of the highest decision-making body in charge of controlling public finances that corresponds to the court of auditors and national audit office
- member of a central bank's executive board
- ambassadors and representatives
- officers who are at least military generals
- members of administrative, executive and supervisory bodies of a company wholly owned by Finnish state
- members of the boards of and heads of international entities

More information on important public functions as referred to in the Act on Preventing Money Laundering and Terrorist Financing (444/2017) is available at [www.edilex.fi](http://www.edilex.fi).

# What is meant by beneficial owner?

A beneficial owner/Beneficial owners must always be named for the entity (excl. stock-exchange-listed companies, municipalities, cities, municipal public utilities, universities, the evangelical lutheran and orthodox church).

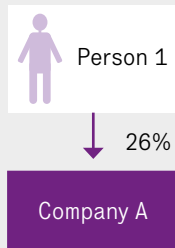
A beneficial owner is a person(s) who can influence the entity's decision-making, e.g., by virtue of a certain share ownership or control.

- a) The beneficial owner is always a natural person who has control in the entity. Control arises if the person owns or controls more than 25 per cent of the voting rights carried by the entity's shares (capital, participations or voting rights), or has the right, on the basis of his/her control, to appoint or dismiss a majority of the members of the entity's board of directors (or a comparable body).
- b) In a general partnership, beneficial owners are considered to be the partners, and in a limited partnership, beneficial owners are the active partner(s). In foundations, the beneficial owners are the members of the boards of directors and the members of the supervisory board. In associations, religious communities, housing co-operatives and housing and property companies, the members of the board of directors are considered to be the beneficial owners. If a beneficial owner cannot be named on the above-mentioned grounds, the beneficial owners will be considered to be the entity's board of directors or active partners, the managing director or a person in similar position, who shall be entitled to make decisions that are binding on the entity.
- c) The beneficial owner can exercise control either directly or through several companies or entities.

## Example 1

Company A is a customer of Mandatum.  
 Person 1 owns 26% of the company's shares.  
 Person 1 is the beneficial owner, as he/she holds more than 25% of Company A's shares.

Person 1 is entered in the form as the **beneficial owner**.

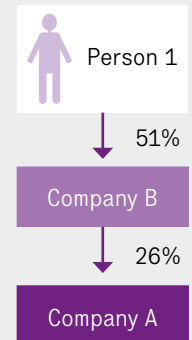


## Example 2

Company A is Mandatum's customer. Company B owns 26% of Company A's shares and Person 1 owns 51% of Company B's shares. Person 1 is the beneficial owner, as with a majority holding (more than 50%) of Company B's shares,

Person 1 indirectly also has control in Company A.

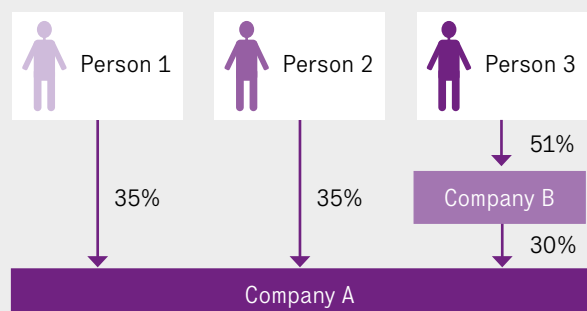
Person 1 is entered as the **beneficial owner**. In addition, the ownership structure must be described in the section **Description of the ownership structure of the entity**.



## Example 3

Company A is Mandatum's customer. Persons 1 and 2 each own 35% and Company B owns 30% of Company A's shares. Person 3 owns 51% of Company B's shares. Person 3 is thus also Company A's beneficial owner (cf. example 2).

Persons 1, 2 and 3 are entered in the form as the **beneficial owner**. In addition, the ownership structure must be described in the section **Description of the ownership structure of the entity**.



## Example 4

Company A is Mandatum's customer. Company A is co-owned by Company B, C and D, each holding 10% of the shares. Person 1 owns 100% of Company B's, C's and D's shares. Person 1 is thus Company A's beneficial owner, as more than 25% ownership in three companies grants indirect control in Company A.

Person 1 is entered in the form as the **beneficial owner**. In addition, the ownership structure must be described in the section **Description of the ownership structure of the entity**.

