



CROMWELL
FUNDS MANAGEMENT

INVESTOR IDENTIFICATION FORM AUSTRALIAN COMPANIES

Dated 18 June 2024

Issued by Cromwell Funds Management Limited

ABN 63 114 782 777

AFSL 333214

Investor Identification

In 2006 the Federal Government enacted the *Anti-Money Laundering and Counter-Terrorism Financing Act 2006* (Cth) (AML/CTF Act). The purpose of this legislation is to enable Australia's financial sector to maintain international business relationships, detect and prevent money laundering and terrorism financing by meeting the needs of law enforcement agencies and to bring Australia in line with international standards.

Why does this legislation affect Cromwell?

As Cromwell Funds Management (CFM) is the responsible entity for investment products, we have to meet stringent investor identification and verification requirements. This means that prior to units in any Cromwell-managed fund being issued, we must be 'reasonably satisfied' that investors are who they claim to be.

What do you need to do?

If you invest in the Fund through a financial adviser or an investor directed portfolio service (IDPS) facility then they will request and collect any verification materials. If you are investing directly, you need to complete the Identification Form and provide certified copies of identification documents which relate to the type of entity making the investment:

Type of Entity	Forms to be completed
Individual / Joint Investors (each applicant must complete a form)	IDENTIFICATION FORM: Individual & Sole Traders Form
Australian Companies	IDENTIFICATION FORM: Australian Companies Form
Australian Regulated Trusts (including Self Managed Super Funds)	IDENTIFICATION FORM: Australian Regulated Trusts (including Self Managed Super Funds) Form
Unregulated Australian Trusts and Foreign Trusts (e.g. Family, Unit and Testamentary Trusts)	IDENTIFICATION FORM: Unregulated Australian Trusts and Foreign Trusts Form

Not on the list?

If you are investing via a type of entity not listed above, please phone Cromwell on 1300 268 078 to discuss which form is appropriate for your needs or visit www.cromwell.com.au for a complete list of Investor Forms.

We may request additional information from you where we reasonably consider it necessary to satisfy our obligations under the AML/CTF Act, and applications will not be processed until the necessary information is provided.

Who is allowed to certify AML/CTF Identification documents?

- a Justice of the Peace
- a Commissioner for Declarations
- a member of the Institution of Chartered Accountants in Australia, CPA Australia or the National Institute of Accountants
- a person who is enrolled on the roll of the Supreme Court of a State or Territory, or High Court of Australia, as a legal practitioner (however described)
- a judge of a court or a magistrate
- a permanent employee of Australia Post employed in an office supplying postal services to the public with 5 years continuous service

- a full time teacher at a school or tertiary institution
- a police officer
- a person who, under a law in force in a State or Territory, is currently licenced or registered to practice one of the following occupations: Chiropractor, Dentist, Medical practitioner, Nurse, Optometrist, Pharmacist, Physiotherapist, Psychologist, Veterinary surgeon
- an officer with, or authorised representative of, a holder of an Australian financial services licence, having 2 or more continuous years of service with one or more licensees
- any other persons mentioned in Part 1 and Part 2 of the *Statutory Declarations Regulations 1993* (Cth)- Schedule 2.

Politically exposed person (PEP) means an individual:

- 1) who holds a prominent public position or function in a government body or an international organisation, including:
 - a) Head of State or head of a country or government; or
 - b) government minister or equivalent senior politician; or
 - c) senior government official; or
 - d) Judge of the High Court of Australia, the Federal Court of Australia or a Supreme Court of a State or Territory, or a Judge of a court of equivalent seniority in a foreign country or international organisation; or
 - e) governor of a central bank or any other position that has comparable influence to the Governor of the Reserve Bank of Australia; or
 - f) senior foreign representative, ambassador, or high commissioner; or
 - g) high-ranking member of the armed forces; or
 - h) board chair, chief executive, or chief financial officer of, or any other position that has comparable influence in, any State enterprise or international organisation; and
- 2) an immediate family member of a person referred to in paragraph (1), including:
 - a) a spouse; or
 - b) a de facto partner; or
 - c) a child and a child's spouse or de facto partner; or
 - d) a parent; and
- 3) a close associate of a person referred to in paragraph (1), which means any individual who is known (having regard to information that is public or readily available) to have:
 - a) joint beneficial ownership of a legal entity or legal arrangement with a person referred to in paragraph (1); or
 - b) sole beneficial ownership of a legal entity or legal arrangement that is known to exist for the benefit of a person described in paragraph (1).

A "beneficial owner":

- 1) an individual who owns or controls (directly or indirectly) a reporting entity;
- 2) an individual who ultimately owns or controls (directly or indirectly) the customer;
- 3) in this definition, control includes control as a result of, or by means of, trusts, agreements, arrangements, understandings and practices, whether or not having legal or equitable force and whether or not based on legal or equitable rights, and includes exercising control through the capacity to determine decisions about financial and operating practices; and
- 4) in this definition, "owns" means ownership (either directly or indirectly) of 25% or more of an entity.

IDENTIFICATION FORM - AUSTRALIAN COMPANIES



GUIDE TO COMPLETING THIS FORM

- This form is for Australian Companies only. Foreign Companies can contact Cromwell to obtain the Foreign Companies Identification Form.
- Complete both Sections 1, 2 and 3.
- Complete separate Individual Identification forms for each of the Company's Beneficial Owners (refer Section 1.5 of this form).
- Complete this form using BLACK INK and write clearly within the boxes in CAPITAL LETTERS.
- Contact Cromwell's Investor Services Team on 1300 268 078 or invest@ Cromwell.com.au if you have any queries.

PART 1

AUSTRALIAN COMPANY DETAILS

1.1 GENERAL INFORMATION

Full name as registered by ASIC

ACN

Registered office address (PO Box is NOT acceptable)

Street

Suburb

State

Postcode

Country

Principal place of business (PO Box is NOT acceptable)

Street

Suburb

State

Postcode

Country

1.2 COMPANY TYPE

Select only ONE of the following categories.

Public Go to Part 1.3

Proprietary Go to Part 1.4

1.3 REGULATORY / LISTING DETAILS

If the company is regulated or listed, select the relevant category and provide the information requested.

Regulated company (licensed by an Australian Commonwealth, State or Territory statutory regulator)

Regulator name

Licence details

Australian listed company

Name of market / exchange

Majority-owned subsidiary of an Australian listed company

Australian listed company name

Name of market / exchange

Go to Part 2

IDENTIFICATION FORM - AUSTRALIAN COMPANIES

1.4 DIRECTORS

To be completed for proprietary companies only, not required for public companies as per Part 1.2.

How many directors are there?

Provide full name of each director below

Surname	Full given name(s)
1 <input type="text"/>	<input type="text"/>
2 <input type="text"/>	<input type="text"/>
3 <input type="text"/>	<input type="text"/>
4 <input type="text"/>	<input type="text"/>
5 <input type="text"/>	<input type="text"/>

If there are more directors, provide details on a separate sheet and tick this box.

1.5 BENEFICIAL OWNERS

To be completed for proprietary companies only, not required for public companies per Section 1.2.

Provide details of ALL individuals who are ultimately beneficial owners through one or more share holdings of more than 25% of the company's issued capital, (through direct or indirect share holdings).

Beneficial owner 1

Surname	Full given name(s)
<input type="text"/>	<input type="text"/>

Beneficial owner 2

Surname	Full given name(s)
<input type="text"/>	<input type="text"/>

Beneficial owner 3

Surname	Full given name(s)
<input type="text"/>	<input type="text"/>

Beneficial owner 4

Surname	Full given name(s)
<input type="text"/>	<input type="text"/>

PART 2

TAX INFORMATION

Collection of tax status in accordance with the *United States Foreign Account Tax Compliance Act (FATCA) and Common Reporting Standard (CRS)*.

2.1 TAX STATUS

Select only ONE of the following categories and provide the information requested

- Financial Institution** (A custodial or depository institution, an investment entity or a specified insurance company for FATCA/CRS purposes)

Provide the company's Global Intermediary Identification Number (GIIN), if applicable

If the company does not have a GIIN, please provide its FATCA status

If the company is a Financial Institution, Part 2 is now complete, proceed to Part 3.

- Non-Financial Public Company** (Public companies as per Part 1.3 that are not Financial Institutions as described above)

If the company is a Public Company, Part 2 is now complete, proceed to Part 3.

- An Active Non-Financial Entity (NFE)** (Active NFEs include entities where, during the previous reporting period, less than 50% of their gross income was passive income (e.g. dividends, interests and royalties) and less than 50% of assets held produced passive income. For other types of Active NFEs, refer to Section VII in the Annexure of the OECD 'Standard for Automatic Exchange of Financial Account Information' at www.oecd.org.) (Proprietary companies as per Part 1.4 that are not Financial Institutions as described above)

If the company is an Active NFE, please proceed to Part 2.3 (Country of Tax Residency).

- Other** (Entities that are not previously listed – Passive Non-Financial Entities)

Please proceed to Part 2.2 (Foreign Beneficial Owners).

IDENTIFICATION FORM - AUSTRALIAN COMPANIES

2.2 FOREIGN BENEFICIAL OWNERS (INDIVIDUALS)

Are any of the company's beneficial owners tax residents of countries other than Australia Yes No

If "Yes", please provide the details of these individuals below. For each individual please provide their country of tax residency and Tax Identification Number (TIN) for all relevant countries.

Full given name(s)	Surname	Role (e.g. Managing Director)
<input type="text"/>	<input type="text"/>	<input type="text"/>
Country	TIN	If no TIN, list reason A,B or C
<input type="text"/>	<input type="text"/>	<input type="text"/>

Reason A The country of tax residency does not issue TIN's to tax residents.

Reason B The individual has not been issued with a TIN.

Reason C The country of tax residency does not require the TIN to be disclosed.

Full given name(s)	Surname	Role (e.g. Managing Director)
<input type="text"/>	<input type="text"/>	<input type="text"/>
Country	TIN	If no TIN, list reason A,B or C
<input type="text"/>	<input type="text"/>	<input type="text"/>

Reason A The country of tax residency does not issue TIN's to tax residents.

Reason B The individual has not been issued with a TIN.

Reason C The country of tax residency does not require the TIN to be disclosed.

If there are more beneficial owners provide details on a separate sheet and tick this box
Please proceed to Part 2.3 (Country of Tax Residency).

2.3 COUNTRY OF TAX RESIDENCY

Is the Company a tax resident of a country other than Australia? Yes No

If "Yes", please provide the Company's country of tax residence and Tax Identification Number (TIN) or equivalent below. Please list all relevant countries below.

If No, Part 2 is now complete, proceed to Part 3.

Country	TIN	If no TIN, list reason A, B or C
<input type="text"/>	<input type="text"/>	<input type="text"/>
Country	TIN	If no TIN, list reason A, B or C
<input type="text"/>	<input type="text"/>	<input type="text"/>
Country	TIN	If no TIN, list reason A, B or C
<input type="text"/>	<input type="text"/>	<input type="text"/>

If there are more countries, provide details on a separate sheet and tick this box.

Reason A The country of tax residency does not issue TIN's to tax residents.

Reason B The individual has not been issued with a TIN.

Reason C The country of tax residency does not require the TIN to be disclosed.

IDENTIFICATION FORM - AUSTRALIAN COMPANIES

PART 3

DECLARATION AND AUTHORISATION

By completing and signing this form, I declare the tax information provided is accurate.

SIGNATURE A

Date

/ /

Name

If a Company Officer or Trustee, you MUST specify your title:

Director Sole Director and Company Secretary

Trustee Other

SIGNATURE B

Date

/ /

Name

If a Company Officer or Trustee, you MUST specify your title:

Director Company Secretary

Trustee Other