

This document¹⁾, amongst others, assists ING Luxembourg SA ("the Bank"), to obtain sufficient information about a legal entity (hereinafter referred to as "the Client") in order to open/maintain a relationship with the Bank. The purpose of this form, along with other relevant documentation, is to help the Client receive the relevant service and for the Bank to fulfil its legal obligations in respect of anti-money laundering and countering the financing of terrorism (AML/CFT)²⁾, which are in force in Luxembourg.

PART 1: THE CLIENT

- 1.1 General information**
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¹⁾ This document is supplementary to the "Request to open a banking relationship" signed on or around the date mentioned at the end of this interview form. Refusal to fully complete this form may lead the Bank to decline the opening of the requested relationship.

²⁾ "Money laundering" can be generally defined as the processing of criminal proceeds to disguise their illegal origin in order to use the funds to perform legal or illegal activities. "Terrorist financing" uses funds for an illegal purpose (e.g. to support terrorist activities), however the money is not necessarily derived from illicit proceeds.

PART 1: THE CLIENT

1.1. Client general information

Name of the Client: _____

The Client is a:

- Commercial company
- Holding company (e.g. SOPARFI, SPF)
- Other, please specify: _____

In which industry does the Client operate?

- | | |
|--|--|
| <input type="checkbox"/> Financial and insurance activities | <input type="checkbox"/> Scientific research and development |
| <input type="checkbox"/> Legal and accounting activities | <input type="checkbox"/> Information and communication |
| <input type="checkbox"/> Wholesale trade | <input type="checkbox"/> Advertising and market research |
| <input type="checkbox"/> Retail trade | <input type="checkbox"/> Agriculture, forestry and fishing |
| <input type="checkbox"/> Mining and quarrying | <input type="checkbox"/> Public administration and defence |
| <input type="checkbox"/> Manufacturing | <input type="checkbox"/> Education |
| <input type="checkbox"/> Construction | <input type="checkbox"/> Transportation and storage |
| <input type="checkbox"/> Electricity, gas, steam and air conditioning supply | |
| <input type="checkbox"/> Water supply; sewerage, waste management and remediation activities | |
| <input type="checkbox"/> Accommodation and food service activities | |
| <input type="checkbox"/> Repair of motor vehicles and motorcycles | |
| <input type="checkbox"/> Other, please specify: _____ | |

Does the Client's activity fit within ING ESR framework?

ING's Environmental and Social Risk (ESR) framework is built on the basis of ING's values, its underlying Human Rights and the Environmental Management and ESR Exclusion Policy. I.e. the ESR Exclusion Policy restricts certain activities in the following areas: animal welfare, defence/controversial weapons, energy, fisheries, forestry and agro commodities, genetic engineering, manufacturing, mining and metals, pornography, protected areas, ship breaking, gambling. ING will not enter in business engagements where ING's Environmental and Social Policies are not expected to be met.

For more information please refer to www.ing.com/ING-in-Society/Sustainability/Sustainable-business/Environmental-and-social-risk-policies.htm

- Yes
- No

Requested bank services: (more than one option possible)

- Pay (transfers, payment cards, credit cards,...)
- Invest (securities account,...)
- Save (savings account,...)
- Borrow (investment loan,...)

Conc. : _____

Internal use only

Is ING the Client's principal banking partner?

- Yes
 No

Is the Client, or any other entity of the structure, banking with ING Group?

- Yes, in which country: _____
 No

1.2. Organization of the Client

Technical, logistic and human resources deployed by the Client:

Is at least half or majority of board members professionally resident in the country of the Client's establishment³⁾?

- Yes
 No

Is at least one general meeting of the shareholders physically held in the Client's country of establishment³⁾ per annum?

- Yes
 No

Are the meetings of the board (or equivalent governance body) held in the Client's country of establishment³⁾ and documented?

- Yes
 No

Is the registered address located in a building rented or owned by the Client in its country of establishment³⁾?

- Yes
 No

Does the Client have any employee(s) under its payroll in its country of establishment³⁾?

- Yes
 No

Is the bookkeeping performed and stored in the Client's country of establishment³⁾?

- Yes
 No

Are the day-to-day management/activities of the Client performed by the local managers?

- Yes
 No

Does the already incorporated Client hold a bank account in its country of establishment³⁾?

- Yes
 No

Is bank account correspondence to be sent to a different country than the one of the Client's establishment³⁾?

- Yes
 No

3) Country of establishment is a country where the Client has a registered address and tax residence.

1.3. Activities of the Client

Purpose/goal of the overall structure linked to the Client: (more than one option is possible)

- Commercial activity
 Manufacturing activity
 Succession/inheritance planning
 Real estate development and renting out
 Holding and management of various portfolios and assets
 For tax optimization/planning reasons
 Development and management of intellectual property (IP) rights (e.g. to benefit from the IP box regime in Luxembourg)
 To benefit from the EU parent-subsidiary regime and/or interest -royalty regime and/or double tax treaties
 Other, please specify: _____

Is there any debt-financing between the Client and one of the entities of the structure?

- Yes / It is expected
 No

Does the Client sell and/or buy services (or e.g. recharge costs) amongst other entity(ies) of the same group?

- Yes / It is expected
 No

Does the Client benefit from a specific tax treatment/tax advantage (e.g. tax ruling, IP box regime, maritime regime, SPF-regime, securitization regime, consolidated group tax regime, etc.)?

- Yes, please specify: _____
 No

From an AML/CFT perspective, the Bank is obliged to obtain information about AML compliance status of its (prospective) clients. In this respect, if needed, the Bank may request the Client for documentation to support the answers given in this document.

PART 2: TRANSACTIONS IDENTIFICATION

The aim of the underlying questions is to understand the nature and the use of the fund flows related to the Client. First part of the questions (2.1.) is related to the funding of the Client, second part (2.2.) is related to the day-to-day inflows and revenues of the Client, third part (2.3.) concerns expected outflows and fourth part (2.4.) covers physical transactions.

2.1 Client funding

How is the Client funded? *(More than one option is possible)*

- Monetary contribution (equity)
- Non-monetary contribution
- Interest bearing loan
- Interest free loan
- Other, please specify: _____

Please indicate the parties providing the financing to the Client: *(More than one option is possible)*

- Beneficial owners
- Direct/indirect shareholders
- Regulated financial institution
- Related entities within the same structure
- Any other party, please specify: _____

How were the funds (to be) used to finance the Client generated? *(More than one option is possible)*

- Professional income
- Dividends
- Income from real estate
- Income from securities
- Capital gains on disposal of shares
- Capital gains on disposal of real estate
- Capital gains on disposal of business
- Retirement
- Inheritance
- Life insurance (premium)
- Gift/donation (from a third party)
- Other, please specify: _____

Please indicate the economic origin of the incoming assets⁴⁾ which were / will be injected in the Client's structure (e.g. a person sells a property in Country A and the proceeds of the sale are booked on a bank account in Country B):

(Mark with an 'X' the cell with the expected amounts per annum in the below table.)

Country (A)	< 250,000 EUR	250,000 EUR – 500,000 EUR	500,000 EUR – 1,000,000 EUR	1,000,000 EUR – 5,000,000 EUR	> 5,000,000 EUR

Conc. : _____

If different from the here above mentioned economic origin, please indicate the operational origin of the assets⁴⁾ to be transferred (e.g. a person sells a property in Country A and the proceeds of the sale are booked on a bank account in Country B):

(Mark with an 'X' the cell with the expected amounts per annum in the below table.)

Country (B)	< 250,000 EUR	250,000 EUR – 500,000 EUR	500,000 EUR – 1,000,000 EUR	1,000,000 EUR – 5,000,000 EUR	> 5,000,000 EUR

⁴⁾ Assets are defined as non-monetary (shares, equity certificates, bonds, various portfolio, gold, receivables, etc.) and monetary items (cash) which the Client or parties providing the financing plan to transfer to the Bank. Assets are generally derived in a standalone/one-off transaction and do not have recurrent nature.

2.2 Expected inflows and revenues

What is the nature of revenues⁵⁾ which will flow in the bank account of the Client (“Inflows”):

- | | |
|--|--|
| <input type="checkbox"/> Profits from commercial activity | <input type="checkbox"/> Profits from manufacturing activity |
| <input type="checkbox"/> Commissions | <input type="checkbox"/> Interest income |
| <input type="checkbox"/> Dividend income | <input type="checkbox"/> Royalties from licensing of the IP rights |
| <input type="checkbox"/> Income from management of portfolio owned by the Client | |
| <input type="checkbox"/> Receipt of income from the rent of the real estate | |
| <input type="checkbox"/> Capital gains on disposal of the Client’s assets | |
| <input type="checkbox"/> Carried interest/management fee distribution | |
| <input type="checkbox"/> Other, please specify: _____ | |

Please indicate the economical origin of the revenues⁵⁾ of the Client (e.g. a company receives dividends in Country A and the dividends are booked on a bank account in Country B):

(Mark with an 'X' the cell with the expected amounts per annum in the below table.)

Country (A)	< 250,000 EUR	250,000 EUR – 500,000 EUR	500,000 EUR – 1,000,000 EUR	1,000,000 EUR – 5,000,000 EUR	> 5,000,000 EUR

If different from the here above mentioned economic origin please indicate the operational origin of the revenues⁵⁾ of the Client:

(Mark with an 'X' the cell with the expected amounts per annum in the below table.)

Country (B)	< 250,000 EUR	250,000 EUR – 500,000 EUR	500,000 EUR – 1,000,000 EUR	1,000,000 EUR – 5,000,000 EUR	> 5,000,000 EUR

⁵⁾ Revenues are monetary items (cash) which the Client plans to transfer to the Bank. The monetary items in this case are linked to the general day-to-day activity of the Client (such as receipt of dividends, interest, royalties, etc.) and generally have recurrent nature

2.3. Expected outflows

What is the nature of payments (to be) made from the bank account of the Client ("Outflows")?

- Payment of salaries
- Payment of taxes, social security, etc.
- Day-to-day expenses
- Payment of dividends to the shareholders
- Payment of interest expense on the loan granted to the Client
- Payment of directorship fees
- Payment of royalties for using the IP rights
- Payment of commissions
- Carried interest/management fee distribution
- Payment of rent for the use of the real estate
- Other, please specify: _____

What is the operation destination of the payments done from the Client's account?

(Mark with an 'X' the cell with the expected amounts per annum in the below table.)

Country	< 250,000 EUR	250,000 EUR – 500,000 EUR	500,000 EUR – 1,000,000 EUR	1,000,000 EUR – 5,000,000 EUR	> 5,000,000 EUR

2.4. Physical transactions

Does the Client plan to physically deposit funds in the bank account (cash and/or cheque and/or physical certificate)?

- Yes
- No

If the answer is 'Yes' to the previous question, please indicate the following:

- Amount: _____
- Frequency: _____

(Please provide an approximate indication, e.g.: between 10,000 EUR and 20,000 EUR per month)

Does the Client plan to physically withdrawals funds from the bank account (cash)?

- Yes
- No

If the answer is 'Yes' to the previous question, please indicate the following:

- Amount: _____
- Frequency: _____

(Please provide an approximate indication, e.g.: between 10,000 EUR and 20,000 EUR per month)

PART 3: STRUCTURE CHART

Structure of the group

Please provide a **full top-down structure chart** (with percentage of shareholding/investment) indicating names and the countries of tax residence of:

- the beneficial owner(s);
- the Client;
- underlying assets/targets;
- the intermediary entities between the Client, the beneficial owner and the underlying assets / targets.

The structure chart does not have to be provided in cases, where beneficial owner(s) is/are sole shareholder(s) in a company, which they own directly and the bylaws of the company support this together with the beneficial owner self-certification form. **Please confirm if the Client falls under this case:**

- Yes
 No

If the answer is 'No', please reply to questions from (a) to (d).

a) How is the chart provided?

- Full top-down structure chart is provided
 Partial structure chart is provided
 Structure chart is not provided

b) Is there a trust/foundation/charity/(limited) partnership/any similar arrangement among the intermediary layers between the Client and the beneficial owners? (More than one option possible)

- Yes
 No

c) How many layers are there in the structure (e.g. beneficial owner – Layer 1, Client – Layer 2, targets / underlying assets – Layer 3, intermediary entity A – Layer 4, intermediary entity B – Layer 5, intermediary entity C – Layer 6, etc.)?

- 2 (beneficial owner, Client)
 3 (beneficial owner, Client, target)
 4
 5
 more than 5

d) How many countries of tax residence are involved in the top-down structure (please check the country of tax residence of the beneficial owner(s), Client, targets / underlying assets, intermediary entities between the Client and the beneficial owners)?

- 2
 3
 4
 5
 more than 5

Is the Client supervised by a national regulator?

- The Client itself is supervised by a regulator. Please precise the regulator and the country of its location: _____
- The Client is part of a structure supervised by a regulator. Please precise the regulator and the country of its location: _____
- Neither the Client nor the structure are supervised by a regulator

PART 4: BENEFICIAL OWNER⁷⁾

(One form per beneficial Owner)

Name of the beneficial owner: _____

If available, please obtain the following information on the beneficial owner:

- Public information/Curriculum Vitae

Does the beneficial owner benefit from a specific tax regime in his/her country of residence (e.g. UK non-domiciled, Swiss taxpayer on spendings, ...)?

Yes. Please specify the specific tax regime and provide related documentation:

No

Does the owner of the entity/structure use assets belonging to the entity for his/her own purpose?

Yes. Please specify what kinds of assets are used and for what purpose:

No

The below part should be filled in for any natural person who has been identified as a Beneficial Owner of the Client, except for senior managing officials (to be done on the basis of the public information, Curriculum Vitae, discussion with the legal representatives of the Client, etc.):

Estimation of total wealth of the Beneficial Owner: (amount in EUR)

< 500,000

2,500,000 - 4,999,999

500,000 - 999,999

5,000,000 - 10,000,000

1,000,000 - 2,499,999

> 10,000,000

Category of revenues which constituted the wealth of the beneficial owner:

Professional revenues

Inheritance

Real estate income

Passive income from business (dividends, capital gains, royalties, etc.)

Income from securities and transactions with securities

Other: _____

In which country(-ies) was the wealth of the Beneficial Owner(s) created?

⁷⁾ Beneficial Owner can be defined as follows:

Any natural person(s) who ultimately owns a legal entity through direct or indirect ownership of more than 25% of the shares or through an ownership interest of more than 25% in that entity including through bearer shareholdings.

Any natural person(s) who ultimately controls the legal entity through sufficient percentage of the shares or voting rights or ownership interest. Control through other means also includes the notion of indirect control which may extend beyond legal ownership or could be through a chain of corporate vehicles and/or through nominees. This indirect control can be identified through various means, such as shareholders' agreement, exercise of dominant influence or power to appoint senior management.

There may be cases where no natural person is identifiable who ultimately owns or exerts control over a legal entity. In such exceptional cases, the Client, having exhausted all other means of identification, and provided there are no grounds for suspicion, may consider the Senior Managing Official(s) to be the Beneficial Owner(s). Senior Managing Officials are any natural person(s) responsible for strategic decisions that fundamentally affect the business practices or general direction of the legal entity and any natural person(s) who exercises executive control over the daily and regular business of the legal entity through a senior management position, such as Director, Chief Executive Officer (CEO), Chief Financial Officer (CFO), managing or executive director, or president.

Conc. : _____

Internal use only

CL18064/3

Signature(s)

The RM should check validity of the client part and whether the regulator / stock exchange as elected by the client in Sections 1.1., 3.1. and 3.2. (should it be the case) is recognized by ING.

All signatories on this form declare and warrant to the Bank to consent and/or to have obtained the prior consent from each individual mentioned in this form to have their personal data processed as provided hereunder. In addition, the personal data provided to the Bank will be processed in accordance with the Bank's applicable General Terms and Conditions. Individuals have a right of access, rectification, blocking, and, as the case may be, of deletion that may be used as provided therein and in the Privacy Statement of the Bank available on its website.

The Client understands that the information provided in this form is subject to all the provisions of the Bank's General Terms and Conditions governing the Client's relationship with the Bank and stipulating how the Bank may use and share the information communicated.

This form has been filled out by:

- The legal representatives: Name _____
- The intermediary (please specify): Name _____
- The Relationship (ING Luxembourg)

Based on (more than 1 option possible):

- Interview with the Client dated: _____
- Interview with the Beneficial Owner(s) dated: _____
- Public information to be delivered to the bank and recorded in its files
- Not public information to be delivered to the bank and recorded in its files

Date: _____

Name and Signature of the Relationship manager:

Name and Signature of the Legal representative/intermediary (if applicable) :

Conc. : _____