

Declaration and Indemnity

By signing and returning this Declaration and Indemnity (“this Declaration”) and all documents (the “Documents”) provided to H&J Corporate Services Ltd. (“H&J Corp.”) to facilitate reporting (the “CESRA Reporting”) on your entity (the “Entity”) in compliance with the Commercial Entities (Substance Requirements) Act, 2023 (the “Act”), I/we hereby declare with the intention of being legally bound by the terms of this Declaration and with the intention of binding the Entity, the following:

1. The information provided in this Declaration and the Documents is, to the best of my/our knowledge, information and belief, true correct and complete.
2. I am/We are duly authorized by the Entity to execute this Declaration and to provide the Documents.
3. H&J Corp. shall only be obliged to attend to the economic substance reporting if complete information is provided by the deadlines stipulated by H&J Corp.
4. I/We undertake to pay H&J Corp.’s fees in effect from time to time relating to economic substance reporting.
5. I/We acknowledge that the information herein will be reported to the Authority (as defined in the Act), and may be reported to the jurisdiction of incorporation of the Entity, the jurisdiction of residence of the ultimate beneficial owner, the immediate parent entity and the ultimate parent entity and any other jurisdiction in which we have asserted tax residence. I/we waive any right to confidentiality and data protection in respect of any information disclosed to the Authority by H&J Corp. and/or its affiliates in connection with the CESRA Reporting.
6. I/We unconditionally and irrevocably release, discharge, and dismiss H&J Corp. and its shareholders, directors, officers, employees, servants, agents, contractors, successors and assigns, (together the “Indemnified Parties”) from any and all demands, claims, liabilities, obligations, damages, losses, costs, expenses, actions and causes of action whatsoever at law or in equity, which could or might be asserted by any person or entity against the Indemnified Parties relating to or arising out of or in connection with the economic substance reporting by H&J Corp. on my/our behalf, save and except if due to the fraud or negligence of the Indemnified Parties.
7. I/We indemnify the Indemnified Parties in respect of any and all liabilities, obligations, losses, damages, penalties, claims, actions, suits, demands, costs, expenses or disbursements of any kind and nature whatsoever which may be imposed on, incurred by or asserted against the Indemnified Parties in any way relating to or arising out of or in connection with the CESRA Reporting by H&J Corp. on my/our behalf.

EXECUTED and **DELIVERED** as a)

DEED by _____)

Name of entity

_____)

acting by its authorized signatory in)

the presence of:)

Authorized Signatory/Director/Officer

Witness Signature

Date:

Schedule

If you have declared that the Entity is a commercial entity conducting a relevant activity, substantiating proof for expenditure and relevant income for Relevant Activities may include:

- Financial statements for the relevant fiscal period

If you have declared that the Entity is tax resident in a jurisdiction outside of The Bahamas please attach any of the following documentation under each category to demonstrate proof of the Entity's registration and compliance with the tax requirements of that jurisdiction.

Proof that the Entity is tax resident in the other jurisdiction:

- A tax residence certificate issued by a foreign jurisdiction;
- An official receipt or statement issued by a foreign tax authority;
- Tax assessments, demands or evidence of payment issued by the foreign tax authority;
- Rulings issues by the tax authority of the other jurisdiction;
- Tax returns submitted to the foreign tax authority.

Proof that the Entity is subject to the jurisdiction's corporate income tax system:

- Tax assessments, demands or evidence of payment issued by the foreign tax authority;
- Tax returns submitted to the foreign tax authority;
- Rulings issued by the tax authority of the other jurisdiction.

If you have declared that the Entity is engaged in a relevant activity and that it conducts its core income generating activities in The Bahamas, but it is resident owned in The Bahamas, please confirm that the following documents are attached:

- Shareholders' registers indicating the name and address of the shareholder(s) and quantity of shares held;
- Copy of the passport of the shareholder(s) or beneficial owner(s), if the shareholder is an entity (if Bahamian citizens)
- Copy of the permanent residency certificate of the shareholder/beneficial owner(s) (if holding permanent residency status).

If you have declared that the Entity is engaged in a relevant activity "Commercial Use of Intellectual Property and that it conducts its core income generating activities in The Bahamas, please confirm that the following documents are attached:

- Detailed business plan which explains the rationale for holding Intellectual Property assets in The Bahamas:

- Evidence that decision making is taking place within the Bahamas, including but not limited to, minutes of meetings which have taken place in The Bahamas.