

Important information

Anti-Money Laundering and related laws

Anti-Money Laundering and other related laws require us to collect and/or verify information about the identity of customers and related parties, including anyone acting on your behalf.

The following instructions for completing the Initial Application Form will assist you to provide this information. The provision of complete and accurate information will enable us to process your application efficiently and meet our legislative obligations.

Under relevant laws, we may be required to ask you for additional identity verification documents and/or information about you or a related party, either when we are processing your application or at some stage after we issue the units. We may pass any information we collect to the relevant government authority.

We reserve the right to restrict withdrawals from your account if we have not been provided with the necessary identification information about you or a related party.

Australian tax file number

ACP is authorised under the Australian Income Tax Assessment Act 1936 to ask for your Australian tax file number (TFN) when you open an investment account for income distribution purposes. You don't have to provide your TFN and it's not an offence if you decide not to, but if you don't, 'Pay As You Go Withholding Tax' will be deducted at the highest marginal tax rate (plus Medicare Levy) from any income distributions payable to you.

Foreign Account Tax Compliance Act (FATCA)

FATCA is a US law that aims to improve tax information reporting on US persons to the United States Internal Revenue Service (IRS). Under the Act, financial institutions are required to undertake certain identification and due diligence procedures with respect to clients and to report annually to the IRS, via the local tax authority (Australian Tax Office (ATO) in Australia), on US persons who directly or indirectly own financial accounts. In certain cases, financial institutions are also required to withhold and pay to the IRS a percentage of certain categories of US source payments.

FATCA Definitions

US citizen or resident of the US for tax purposes

US citizen or resident of the US for tax purposes includes:

- Anyone born in the US (who hasn't renounced their citizenship)
- A US citizen (including persons with dual or multiple citizenships)
- A US lawful permanent resident (e.g. green card holders).

Note: if you have a US address, a US telephone number, a US passport, a US driver's licence or a US birth certificate, this would indicate that you are possibly a resident of the US for tax purposes. Where you present any of these US characteristics and claim not to be a resident of the US for tax purposes, then proof should be supplied to establish that you are not a resident of the US for tax purposes e.g. a loss of nationality certificate.

If you think you may be a resident of the US for tax purposes, but are not certain, it is advisable that you seek specialist tax advice.

If you identify yourself as a US citizen or resident for tax purposes we will have to report your information to the ATO which, may in turn, report you to the US tax authority.

US Taxpayer Identification Number (TIN)

The types of TIN include:

- Social Security Number (SSN) – for individuals
- Individual Taxpayer Identification Number (ITIN) – for individuals that are not eligible for an SSN
- Employer Identification Number (EIN) – for entities

The TIN should not be confused with an Australian Tax File Number. A US TIN is 9 digits long and should not be in ascending or descending order e.g. 123456789 or all of a single digit e.g. 111111111.

Financial Institution

A financial institution is an entity (e.g. company, partnership or trust) that engages in one of the following:

- accepts deposits in the ordinary course of a banking or similar business (depository institution);
- holds a substantial portion of its business (equals or exceeds 20 percent of the entity's gross income) in financial assets for the account of others (custodial institution);
- is an investment entity including entities that trade in financial assets or that are investing, administering, managing funds, money, or certain financial assets on behalf of other persons;
- is an insurance company that issues or is obligated to make payments with respect to a Cash Value Insurance Contract or an Annuity Contract; or
- is an entity that is a holding company or treasury centre that is a part of a group that includes one of the above.

Global Intermediary Identification Number (GIIN)

A Global Intermediary Identification Number (GIIN) is a unique ID number that non-US financial institutions receive from the IRS when they register as a financial institution for FATCA.

FATCA status

Where a financial institution does not have a GIIN they will need to provide their FATCA status. This status can ONLY be one of the following:

- Deemed compliant Financial Institution
- Excepted Financial Institution
- Exempt beneficial owner
- Non-reporting IGA Financial Institution
- Non-participating Financial Institution
- Other e.g. 'GIIN applied for but not yet issued'

Entities that are financial institutions should be aware of their FATCA status and it is not your adviser's responsibility to determine this. If you are not aware then it may be possible that the entity is not actually a financial institution.

Privacy notification

We collect your personal information from you directly wherever we can but in some cases where it is relevant to you and your investment we may collect it from third parties such as your agent or adviser. We do this for the purposes of determining your eligibility to invest and to be able to manage and administer your investment. If your personal information is not provided to us we may not be able to accept your investment or be able to manage and administer it. We may collect information about you because we are required or authorised by law to collect it. There are laws that affect financial institutions, including company and tax laws, which require us to collect personal information so we can, for example, verify your identity under Commonwealth Anti-Money Laundering law.

As a member within the NAB Group, we may disclose your personal information to other NAB Group members and to parties outside the NAB Group (for example and as relevant to your investment, to your agent or adviser, to our agents and service providers including for the purpose of training staff and the development and testing of products, services and systems, risk management, planning, research and analysis). We may share your information with other organisations for the purposes for which we collect your information. We may also provide your information to Members within the NAB Group who operate their business overseas and we may need to share your information to organisations outside Australia (for example a call centre) – a list of those countries where such information may be shared is at nab.com.au/privacy/overseas-countries-list

Further, to let you know about the products the NAB Group has on offer, we and other NAB Group members may use your personal information for marketing activities. You can let us know at any time if you no longer wish to receive direct marketing offers from members of the NAB Group by contacting us.

More information about how we collect, use, share and handle your personal information is in the NAB Group privacy policy, including how you may access or correct information we collect about you and how you may make a complaint about a privacy issue, at nabam.com.au. Contact us for a paper copy or if you have any questions or comments about the NAB Group privacy policy or procedures.