



**(3) Controlling Persons (Complete this part if the entity account holder is a passive NFE)**  
控權人 (如公司/機構帳戶持有人是被动非財務實體，填寫此部)

Indicate the name of all controlling person(s) of the account holder in the table below. If no natural person exercises control over an entity which is a legal person, the controlling person will be the individual holding the position of senior managing official. 就帳戶持有人，填寫所有控權人的姓名在列表內。就法人實體，如行使控制權的並非自然人，控權人會是該法人實體的高級管理人員。

**Complete Self-Certification Form – Controlling Person for each controlling person.** 每名控權人須分別填寫一份自我證明表格 – 控權人。

(1)	(5)
(2)	(6)
(3)	(7)
(4)	(8)

**(4) Jurisdiction of Residence and Taxpayer Identification Number or its Functional Equivalent (“TIN”)\***  
居留司法管轄區及稅務編號或具有等同功能的識別編號 (以下簡稱「稅務編號」)\*

Complete the following table indicating (a) the jurisdiction of residence (including Hong Kong) where the account holder is a **resident for tax purposes** and (b) the account holder’s TIN for each jurisdiction indicated. Indicate **all** (not restricted to five) jurisdictions of residence.  
提供以下資料，列明 (a) 帳戶持有人的居留司法管轄區，亦即帳戶持有人的稅務管轄區 (香港包括在內) 及 (b) 該居留司法管轄區發給帳戶持有人的稅務編號。列出**所有** (不限於 5 個) 居留司法管轄區。

If the account holder is a tax resident of Hong Kong, the TIN is the Hong Kong Business Registration Number.  
如帳戶持有人是香港稅務居民，稅務編號是其香港商業登記號碼。

If the account holder is not a tax resident in any jurisdiction (e.g. fiscally transparent), indicate the jurisdiction in which its place of effective management is situated.  
如果帳戶持有人並非任何稅務管轄區的稅務居民 (例如：它是財政透明實體)，填寫實際管理機構所在的稅務管轄區。

If a TIN is unavailable, provide the appropriate reason A, B or C: 如沒有提供稅務編號，必須填寫合適的理由：

**Reason 理由**

- A** – The jurisdiction where the account holder is a resident for tax purposes does not issue TINs to its residents.  
帳戶持有人的居留司法管轄區並沒有向其居民發出稅務編號。
- B** – The account holder is unable to obtain a TIN. Explain why the account holder is unable to obtain a TIN if you have selected this reason.  
帳戶持有人不能取得稅務編號。如選取這一理由，解釋帳戶持有人不能取得稅務編號的原因。
- C** – TIN is not required. Select this reason only if the authorities of the jurisdiction of residence do not require the TIN to be disclosed.  
帳戶持有人毋須提供稅務編號。居留司法管轄區的主管機關不需要帳戶持有人披露稅務編號。

Jurisdiction of Residence* 居留司法管轄區*	TIN* 稅務編號*	Enter Reason A, B or C if no TIN is available 如沒有提供稅務編號，填寫理由 A、B 或 C	Explain why the account holder is unable to obtain a TIN if you have selected Reason B 如選擇理由 B，解釋帳戶持有人不能取得稅務編號的原因
(1)			
(2)			
(3)			
(4)			
(5)			

If you are not a tax resident in the Jurisdiction of Incorporation or Organisation, Current Business Address or Mailing Address (i.e. \_\_\_\_\_), please select one of the following reasons as applicable. 如果您不是公司/機構戶口持有人成立為法團或設立所在的稅務管轄區、現時營業地址或通訊地址的稅務居民(即：\_\_\_\_\_)，請根據情況選擇以下一個原因。

- Under the relevant tax laws, the tax residence of the Entity Account Holder is determined by reference to its place of effective management, and that the jurisdiction where the effective management is situated differs from the jurisdiction in which it was incorporated; or  
根據相關稅法，公司/機構戶口持有人的稅務居民身份是依據其實際管理所在的地區，而其實際管理所在的地區與其成立的地區並不相同；或
- The aforementioned reasonable explanation is NOT applicable to the Entity Account Holder and I therefore provide the reasonable explanation to support its jurisdiction of tax residence of the entity as follows:  
上述合理解釋不適用於本人之公司/機構，因此本人提供下列合理解釋以支持本人之公司/機構的稅務居住地區：

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

## (5) Personal Information Collection Statement 個人資料收集說明書

The provision of information and other personal data by you is on a voluntary basis. However, failure to provide us with the information and other personal data as requested may result in your application/instruction not being able to be processed. The information and other personal data provided by you will only be accessed and handled by Principal Trust Company (Asia) Limited (“the Trustee and Administrator”) and its affiliate(s), Principal Insurance Company (Hong Kong) Limited (“the sponsor”), Principal Investment & Retirement Services Limited (“the promoter”) (collectively, “the Companies”) and the relevant persons stated herein below.

The information and other personal data collected from you from time to time will be used for the purposes of: (1) processing your application for participation under Principal MPF Scheme Series 800 (“the Scheme”); (2) administering and managing your contributions and accrued benefits under the Scheme; (3) carrying out your instructions or responding to any enquiries given or purporting to be given by you or on your behalf; (4) direct marketing of mandatory provident fund (“MPF”), retirement schemes, MPF and retirement schemes related services and products of Principal Trust Company (Asia) Limited and its member company(ies); (5) providing MPF and retirement schemes related services; (6) maintaining statistical data and providing a database for product and market research; (7) compliance with applicable laws, regulations, guidelines or guidance given or issued by any legal, regulatory, governmental, tax, law enforcement or other authorities, or self-regulatory or industry bodies or associations of financial services providers within or outside the Hong Kong Special Administrative Region (“Hong Kong”), including but not limited to the Foreign Account Tax Compliance Act and the Common Reporting Standard; and (8) any other purposes relating or incidental to the above.

Furthermore, for the purpose of automatic exchange of financial account information, such information and information regarding the account holder and any reportable account(s) may be reported by the Trustee and its member company(ies) to the Inland Revenue Department of the Government of Hong Kong (“IRD”) and exchanged with the tax authorities of another jurisdiction or jurisdictions in which the account holder may be resident for tax purposes, pursuant to the legal provisions for exchange of financial account information provided under the Inland Revenue Ordinance (Cap.112 of the Laws of Hong Kong). You shall advise us of any change in circumstances which affects the tax residency status of the account holder, and to provide us with a suitably updated self-certification form within 30 days of such change in circumstances.

You may visit the IRD website that sets out information relating to the implementation of automatic exchange of financial account information in Hong Kong: [http://www.ird.gov.hk/eng/tax/dta\\_aeoi.htm](http://www.ird.gov.hk/eng/tax/dta_aeoi.htm).

Your personal data (name, contact details and account records) may be used for direct marketing of MPF products, retirement schemes, MPF and retirement schemes related services and products of the Trustee and its member company(ies) only with your consent.

Your personal data may be transferred/disclosed to the following parties (whether within or outside Hong Kong) for any of the purposes stated above: (1) any agent, contractor, third party service provider, or any company(ies) within the same group of companies to which the Trustee belongs which provides administrative, telecommunications, computer, data processing or storage, marketing, professional or other services to the Trustee in connection with their business operations; (2) any person to whom the Trustee is under an obligation to make disclosure under the requirements of any laws and regulations binding on the Trustee or any of its member company(ies) or under and for the purposes of any guidelines issued by regulatory, tax or other authorities with which the Trustee or its member companies are expected to comply; and (3) any actual or proposed assignee of the Trustee or participant or sub-participant or transferee of the rights of the Trustee in respect of you.

Under the Personal Data (Privacy) Ordinance (Cap.486 of the Laws of Hong Kong), you have a right to request access to and correction of any of your personal information held by the Companies and to request not to use your personal data for direct marketing purpose as stated above. The aforesaid requests can be made in writing to: Data Protection Officer, Principal Trust Company (Asia) Limited, 30/F, Millennium City 6, 392 Kwun Tong Road, Kwun Tong, Kowloon, Hong Kong. If you have any questions or wish to know more about our privacy policy, please send your enquiry to the above address or contact us at (852) 2827 1233.

閣下提供的資料及其他個人資料純屬自願性質。然而，如未能提供所需資料及其他個人資料，可能導致閣下的申請/指示不獲處理。閣下提供的資料及其他個人資料僅供信安信託(亞洲)有限公司(「受託人及管理人」)、美國信安保險有限公司(「保薦人」)及信安投資及退休金服務有限公司(「推銷商」)(統稱「公司」)及以下所指的相關人士/機構使用及處理。

向閣下所收集的資料及其他個人資料將會用作下列用途：(1) 處理閣下參與信安強積金計劃800系列(「該計劃」)的申請；(2) 處理及管理閣下於該計劃的供款及累算權益；(3) 執行閣下的指示或答覆閣下或閣下代表的查詢；(4) 直接促銷信安信託(亞洲)有限公司及其成員公司的強制性公積金(「強積金」)產品、退休計劃、強積金及退休計劃的相關服務及產品；(5) 提供強積金及退休計劃的相關服務；(6) 維持統計數據及用作產品及市場研究資料庫；(7) 遵守有關不論於香港特別行政區境內或境外的任何法律、監管、政府、稅務、執法或其他機關，或金融服務供應商的自律監管或行業組織或協會作出或發出的任何適用的法律、規則、指引或指導，包括但不限於《外國帳戶稅務合規法案》及共同匯報標準；及(8) 用作與任何上述有關的用途。

除上述以外，受託人及其成員公司可根據《稅務條例》(香港法例第112章)有關交換財務帳戶資料的法律條文，及作自動交換財務帳戶資料用途，把該等資料和關於帳戶持有人及任何須申報帳戶的資料向香港特別行政區政府稅務局(「稅務局」)申報，從而把資料轉交到帳戶持有人的稅務管轄區的稅務當局。如情況有所改變，以致影響帳戶持有人的稅務居民身分，閣下會通知本公司，並會在情況發生改變後30日內，向本公司提交一份已適當更新的自我證明表格。

閣下可參閱稅務局網站 [http://www.ird.gov.hk/chi/tax/dta\\_aeoi.htm](http://www.ird.gov.hk/chi/tax/dta_aeoi.htm) 以了解香港實施自動交換財務帳戶資料的詳情。

只有在閣下的同意下，閣下的個人資料(姓名、聯絡資料和戶口記錄)或會用於直接促銷本公司及其成員公司的強制性公積金的產品、退休計劃、強積金相關的服務和產品。

閣下的個人資料可能轉移/披露予以下的人士(不論在香港特別行政區內外)作為上述所載的任何用途：(1) 在業務上向受託人提供行政、電訊、電腦、數據處理或儲存、市場推廣、專業或其他任何服務的代理、承包商、第三方服務供應商或本公司所屬公司集團旗下的任何公司；(2) 就受託人或其成員公司所需遵守的法律及規則要求，或按監管機構、稅務或其他主管機構要求受託人或其成員公司需遵守的指引，受託人因而有責任要向其披露的任何人士；及(3) 允許任何受託人的實際或建議承讓人或受託人所持客戶權益的分享者、再分享者、受讓人擁有有關客戶資料的權利。

根據個人資料(私隱)條例(香港法例第486章)，閣下有權要求查閱及更正該公司所持有閣下的個人資料及要求閣下的個人資料不被用作上述的直接促銷用途。上述要求可以書面形式通知保障資料主任，信安信託(亞洲)有限公司，香港九龍觀塘觀塘道392號創紀之城6期30樓，閣下如有任何疑問或欲進一步了解本公司的私隱政策，請致函到上述地址或致電(852) 2827 1233與本公司聯絡。

## (6) Declarations and Signature

### 聲明及簽署

I acknowledge and agree that (a) the information contained in this form is collected and may be kept by Principal Trust Company (Asia) Limited for the purpose of automatic exchange of financial account information, and (b) such information and information regarding the account holder and any reportable account(s) may be reported by Principal Trust Company (Asia) Limited to the Inland Revenue Department of the Government of the Hong Kong Special Administrative Region and exchanged with the tax authorities of another jurisdiction or jurisdictions in which the account holder may be resident for tax purposes pursuant to the legal provisions for exchange of financial account information provided under the Inland Revenue Ordinance (Cap.112).

I certify that I am authorized to sign for the account holder of all the account(s) to which this form relates.

I undertake to advise Principal Trust Company (Asia) Limited of any change in circumstances which affects the tax residency status of the entity identified in Part 1 of this form or causes the information contained herein to become incorrect, and to provide Principal Trust Company (Asia) Limited with a suitably updated self-certification form within 30 days of such change in circumstances.

**I declare that the information given and statements made in this form are, to the best of my knowledge and belief, true, correct and complete.**

本人知悉及同意，信安信託(亞洲)有限公司可根據《稅務條例》(第112章)有關交換財務帳戶資料的法律條文，(a)收集本表格所載資料並可備存作自動交換財務帳戶資料用途及(b)把該等資料和關於帳戶持有人及任何須申報帳戶的資料向香港特別行政區政府稅務局申報。從而把資料轉交到帳戶持有人的居留司法管轄區的稅務當局。

本人證明，就與本表格所有相關的帳戶，本人獲帳戶持有人授權簽署本表格。

本人承諾，如情況有所改變，以致影響本表格第1部所述的公司/機構的稅務居民身分，或引致本表格所載的資料不正確，本人會通知信安信託(亞洲)有限公司，並會在情況發生改變後30日內，向信安信託(亞洲)有限公司提交一份已適當更新的自我證明表格。

本人聲明就本人所知所信，本表格內所填報的所有資料和聲明均屬真實、正確和完備。

**X**

Signature of Employer / Employer's Duly Authorized Person

僱主 / 僱主授權代表簽署

Name姓名

Date (dd/mm/yyyy) 日期 (日/月/年)

**WARNING: It is an offence under section 80(2E) of the Inland Revenue Ordinance if any person, in making a self-certification, makes a statement that is misleading, false or incorrect in a material particular AND knows, or is reckless as to whether, the statement is misleading, false or incorrect in a material particular. A person who commits the offence is liable on conviction to a fine at level 3 (i.e. \$10,000).**

**警告：根據《稅務條例》第80(2E)條，如任何人在作出自我證明時，在明知一項陳述在要項上屬具誤導性、虛假或不正確，或罔顧一項陳述是否在要項上屬具誤導性、虛假或不正確下，作出該項陳述，即屬犯罪。一經定罪，可處第3級（即\$10,000）罰款。**

Trustee & Administrator: Principal Trust Company (Asia) Limited 受託人及管理人: 信安信託(亞洲)有限公司

Sponsor: Principal Insurance Company (Hong Kong) Limited 保薦人: 美國信安保險有限公司

Promoter: Principal Investment & Retirement Services Limited 推銷商: 信安投資及退休金服務有限公司

30/F, Millennium City 6, 392 Kwun Tong Road, Kwun Tong, Kowloon, Hong Kong 香港九龍觀塘觀塘道392號創紀之城6期30樓

Customer Service Hotline 客戶服務熱線: (852) 2827 1233 Employer Hotline 僱主專線: (852) 2251 9322 Fax 傳真: (852) 2827 1707 Website 網址: www.principal.com.hk

**Important Notes 重要提示：**

To comply with the Organisation for Economic Cooperation and Development (“OECD”) Common Reporting Standard (“CRS”) set out in the Inland Revenue (Amendment) (No. 3) Ordinance 2016 and Inland Revenue (Amendment) (No.2) Ordinance 2019 which are effective starting 30 June 2016 and 1 March 2019 respectively, this certificate is to be used by account holder (Entity) to declare the jurisdiction of tax residence and provide the related information.

為配合在 2016 年 6 月 30 日刊憲並生效的《2016 年稅務(修訂)(第 3 號)條例》及在 2019 年 3 月 1 日刊憲並生效的《2019 年稅務(修訂)(第 2 號)條例》中的經濟合作與發展組織 (“OECD”) 共同匯報標準 (“CRS”) 的實施要求，本聲明適用於帳戶持有人(公司/機構)申報其稅務居民身分及提供若干所需資料。

This is a self-certification form provided by an account holder to Principal Trust Company (Asia) Limited for the purpose of automatic exchange of financial account information. The data collected may be transmitted by Principal Trust Company (Asia) Limited to the Inland Revenue Department (“IRD”) for transfer to the tax authority of another jurisdiction. An account holder should report all changes in its tax residency status to Principal Trust Company (Asia) Limited.

這是由帳戶持有人向信安信託(亞洲)有限公司提供的自我證明表格，以作自動交換財務帳戶資料用途。信安信託(亞洲)有限公司可把收集所得的資料交給稅務局，稅務局會將資料轉交到另一稅務管轄區的稅務當局。如帳戶持有人的稅務居民身分有所改變，應盡快將所有變更通知信安信託(亞洲)有限公司。

As a financial institution, Principal Trust Company (Asia) Limited is not allowed to give tax or legal advice. If you have any questions regarding the account holder’s tax residency, please consult your tax adviser or visit the OECD and IRD’s Automatic Exchange of Financial Account Information (“AEOI”) website at <http://www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/> and [http://www.ird.gov.hk/eng/tax/dta\\_aeoi.htm](http://www.ird.gov.hk/eng/tax/dta_aeoi.htm) respectively, or simply scan the QR code, for more CRS and related information.

作為財務機構，信安信託(亞洲)有限公司不獲允許提供稅務或法律意見。若您對帳戶持有人的稅務居民身分存有任何疑問，請詢問專業稅務顧問或瀏覽 OECD (<http://www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/>) 及稅務局 ([http://www.ird.gov.hk/eng/tax/dta\\_aeoi.htm](http://www.ird.gov.hk/eng/tax/dta_aeoi.htm)) 有關自動交換財務帳戶資料的網頁，或掃描此二維碼，以獲取更多共同匯報標準及相關資料。



(OECD 經濟合作與發展組織)



(IRD 稅務局)

All parts of the form must be completed (unless not applicable or otherwise specified). If space provided is insufficient, continue on additional sheet(s). Information in fields/parts marked with an asterisk (\*) are required to be reported by the reporting financial institution to the IRD.

除不適用或特別註明外，必須填寫這份表格所有部分。如這份表格上的空位不夠應用，可另紙填寫。在標有星號 (\*) 的項目為申報財務機構須向稅務局申報的資料。

1. **All parts of the Self-certification Form - Entity must be completed (unless not applicable or otherwise specified).**  
除不適用或特別註明外，必須填寫「自我證明表格 — 公司 / 機構」的所有部分。
2. **The following information may be reported to the relevant tax authority if you are a reportable person:**  
如您是須申報人士，以下資料將可能被申報給相關稅務機關：
  - **Legal Name of Entity or Branch;**  
公司/機構或分支機構的法定名稱;
  - **Current Business Address;**  
現時營業地址;
  - **Mailing Address;**  
通訊地址;
  - **Entity Type;**  
公司/機構類別;
  - **Details of the Controlling persons (if the entity account holder is a passive NFE); and;**  
控權人詳細資料 (如公司/機構帳戶持有人是被动非財務實體) ; 及
  - **Jurisdiction of Residence and Taxpayer Identification Number or its Functional Equivalent ("TIN").**  
居留司法管轄區及稅務編號或具有等同功能的識別編號 (以下簡稱「稅務編號」)
3. **The Entity Account Holder must provide its **entity type** (i.e., Financial Institution, Active NFE, or Passive NFE) as specified in Part 2 of Self-certification Form - Entity. The Entity Account Holder should refer to the Appendix of the Self-certification Form – Entity or seek professional advice if there is any doubt in determining the entity type. Principal Trust Company (Asia) Limited is not required to provide any advice about the entity type of the Entity Account Holder.**  
公司/機構帳戶持有人必須於「自我證明表格 — 公司 / 機構」第2部提供其公司/機構類別 (即財務機構、主動非財務實體、被動非財務實體)。實體帳戶持有人應參考「自我證明表格 — 公司/機構」附錄。如果對實體類型有任何疑問，請尋求專業意見。信安信託(亞洲)有限公司不需要就實體類型為公司/機構帳戶持有人提供任何建議。
4. **The Entity Account Holder is required to provide **all** of its jurisdiction(s) of residence for tax purposes and the respective TIN(s). If a TIN is unavailable, the Entity Account Holder must provide an appropriate reason (i.e., Reason A, Reason B, or Reason C) as specified in Part 4 of Self-certification Form - Entity.**  
公司/機構帳戶持有人必須提供其所有居留司法稅務管轄區以及相應的稅務編號。如沒有提供稅務編號，實體帳戶持有人必須於「自我證明表格 — 公司 / 機構」第4部填寫合適的理由 (即理由A、理由B或理由C)。
5. **If the Entity Account Holder is not a tax resident in the jurisdiction of Incorporation or Organization, Current Business Address or Mailing Address, the Entity Account Holder must provide a reasonable explanation in Part 4 of Self-certification Form - Entity.**  
如公司/機構帳戶持有人不是公司/機構成立為法團或設立所在地、現時營業地址或通訊地址的稅務管轄區居民，公司/機構帳戶持有人必須於「自我證明表格 — 公司 / 機構」第4部填寫合理解釋。
6. **The capacity to sign the Self-certificate Form – Entity includes director or officer of a company, partner of a partnership, trustee of a trust etc.**  
可簽署「自我證明表格 — 公司 / 機構」的身分包括公司的董事或高級人員、合夥的合夥人、信託的受託人等。
7. **Each Employer and Partnership must complete the Self-certification Form - Entity.**  
每名僱主及合夥必須填寫「自我證明表格 — 公司 / 機構」。

## 1. “Account Holder” 「帳戶持有人」

The “Account Holder” is the person listed or identified as the holder of a financial account by the financial institution that maintains the account. This is regardless of whether such person is a flow-through entity. Thus, for example, if a trust or an estate is listed as the holder or owner of a financial account, the trust or estate is the Account Holder, rather than the trustee or the trust’s owners or beneficiaries. Similarly, if a partnership is listed as the holder or owner of a financial account, the partnership is the Account Holder, rather than the partners in the partnership.

「帳戶持有人」指被維持該財務帳戶的財務機構列明為或識辨為帳戶的持有人的人士，不論該人士是否為過渡實體。所以，如果一個信託或遺產被列明為某財務帳戶的持有人或擁有人，則帳戶持有人是該信託或遺產，而非受託人、信託的擁有人或受益人。同樣地，如果一個合夥被列明為某財務帳戶的持有人或擁有人，則帳戶持有人是該合夥，而非合夥的合夥人。

A person, other than a financial institution, holding a financial account for the benefit or account of another person as agent, custodian, nominee, signatory, investment advisor, intermediary, or legal guardian, is not treated as the Account Holder. In these circumstances that other person is the Account Holder. For example in the case of a parent/child relationship where the parent is acting as a legal guardian, the child is regarded as the Account Holder. 除財務機構外，若有關人士以代理人、託管人、代名人、簽署人、投資顧問、中介人或合法監護人身份代其他人士持有財務帳戶，他不會被視為帳戶持有人。在這種情況下，帳戶持有人應為該其他人士。以一個家長與子女開立的帳戶為例，如帳戶以家長為子女的合法監護人名義開立，子女會被視為帳戶持有人。

With respect to a jointly held account, each joint holder is treated as an Account Holder.  
聯名帳戶內的每個持有人都被視為帳戶持有人。

## 2. “Active Non-Financial Entity” (“Active NFE”) 「主動非財務實體」

An NFE is an Active NFE if it meets any of the criteria listed below. In summary, those criteria refer to:  
「主動非財務實體」指符合任何以下準則的非財務實體，總括而言，有關準則指：

- (a) Active NFEs by reason of income and assets;  
符合相關收入及資產規定的主動非財務實體；
- (b) Publicly traded NFEs;  
其股票被公開進行買賣的非財務實體；
- (c) Governmental entities, international organisations, central banks, or their wholly owned entities;  
政府實體、國際組織、中央銀行或其全權擁有的實體；
- (d) Holding NFEs that are members of a non-financial group;  
屬並非財務集團成員的控權非財務實體；
- (e) Start-up NFEs;  
新成立的非財務實體；
- (f) NFEs that are liquidating or emerging from bankruptcy;  
正進行清盤或出現破產的非財務實體；
- (g) Treasury centres that are members of a non-financial group; or  
屬並非財務集團成員的財資中心；或
- (h) Non-profit NFEs.  
非牟利的非財務實體。

An Entity will be classified as Active NFE if it meets any of the following criteria:  
如符合任何以下準則，實體會被分類為主動非財務實體：

- (a) Less than 50% of the NFE’s gross income for the preceding calendar year or other appropriate reporting period is passive income and less than 50% of the assets held by the NFE during the preceding calendar year or other appropriate reporting period are assets that produce or are held for the production of passive income;  
在該年的對上一個公曆年或其他適當申報期，該非財務實體的總收入中少於50%屬被動收入；及在該公曆年或其他適當申報期內，該非財務實體持有的資產中，少於50%屬產生被動收入的資產，或屬為產生被動收入而持有的資產；
- (b) The stock of the NFE is regularly traded on an established securities market or the NFE is a Related Entity of an Entity the stock of which is regularly traded on an established securities market;  
該非財務實體的股票或該非財務實體的有關連實體股票，在某具規模證券市場中，被經常進行買賣；
- (c) The NFE is a governmental entity, an international organisation, a central bank, or an Entity wholly owned by one or more of the foregoing;  
該非財務實體屬政府實體、國際組織、中央銀行或由一個或多於一個前述的實體全權擁有的實體；
- (d) Substantially all of the activities of the NFE consist of holding (in whole or in part) the outstanding stock of, or providing financing and services to, one or more subsidiaries that engage in trades or businesses other than the business of a financial institution, except that an Entity does not qualify for this status if the Entity functions (or holds itself out) as an investment fund, such as a private equity fund, venture capital fund, leveraged buyout fund, or any investment vehicle whose purpose is to acquire or fund companies and then hold interests in those companies as capital assets for investment purposes;  
該非財務實體的活動中，相當大部分是以下活動：持有一間或多於一間從事財務機構業務以外的交易或業務的附屬公司的全部或部分已發行股份，或向該等附屬公司提供資金及服務，但不包括以下情況：該實體以投資基金形式運作，或顯示本身是投資基金，例如私人股權基金、創業資本基金、槓桿式收購基金，或以下述活動為目標的投資工具：購買或資助任何公司，然後為投資目的，持有該等公司的權益作為資本資產；
- (e) The NFE is not yet operating a business and has no prior operating history, a start-up NFE but is investing capital into assets with the intent to operate a business other than that of a financial institution, provided that the NFE does not qualify for this exception after the date that is 24 months after the date of the initial organisation of the NFE;  
該非財務實體（「新成立的非財務實體」）尚未經營業務，亦沒有在過往經營業務，及正出於經營財務機構業務以外的業務的意圖，而將資金投資於資產，但不包括組成已超過 24 個月的非財務實體；
- (f) The NFE was not a financial institution in the past five years, and is in the process of liquidating its assets or is reorganising with the intent to continue or recommence operations in a business other than that of a financial institution;  
該非財務實體在過往 5 年內並非財務機構，並且正對其資產進行清盤，或出於繼續或重新展開經營財務機構業務以外的業務的意圖，而進行重組；
- (g) The NFE primarily engages in financing and hedging transactions with, or for, Related Entities that are not financial institutions, and does not provide financing or hedging services to any Entity that is not a Related Entity, provided that the group of any such Related Entities is primarily engaged in a business other than that of a Financial Institution; or  
該非財務實體主要從事與該實體的屬並非財務機構的有關連實體進行融資及對沖交易，或為該等有有關連實體進行融資及對沖交易；但並沒有向並非其有關連實體的任何實體，提供融資或對沖服務，而其有關連實體所屬的集團，主要從事財務機構業務以外的業務；或
- (h) The NFE meets all of the following requirements (a “non-profit NFE”):  
該非財務實體符合以下所有要求（「非牟利的非財務實體」）：

- (i) It is established and operated in its jurisdiction of residence exclusively for religious, charitable, scientific, artistic, cultural, athletic, or educational purposes; or it is established and operated in its jurisdiction of residence and it is a professional organisation, business league, chamber of commerce, labour organisation, agricultural or horticultural organisation, civic league or an organisation operated exclusively for the promotion of social welfare;  
該非財務實體在其居留司法管轄區成立和營運是純粹為了宗教、慈善、科學、藝術、文化、體育或教育的目的；或該非財務實體在其居留司法管轄區成立和營運，並且是專業組織、商業協會、總商會、勞工組織、農業或園藝組織、文化協會，或純粹為了促進社會福利而營運的組織；
- (ii) It is exempt from income tax in its jurisdiction of residence;  
該非財務實體在其居留司法管轄區獲豁免，而無須繳付入息稅；
- (iii) It has no shareholders or members who have a proprietary or beneficial interest in its income or assets;  
該非財務實體並沒有任何符合以下說明的股東或成員：對該實體的收入或資產，擁有所有權權益或實益權益
- (iv) The applicable laws of the NFE's jurisdiction of residence or the NFE's formation documents do not permit any income or assets of the NFE to be distributed to, or applied for the benefit of, a private person or non-charitable Entity other than pursuant to the conduct of the NFE's charitable activities, or as payment of reasonable compensation for services rendered, or as payment representing the fair market value of property which the NFE has purchased; and  
該非財務實體的居留司法管轄區的適用法律，或該實體的成立文件，並不允許該實體的任何收入或資產，分配予私人或非慈善實體，或為私人或非慈善實體的利益而運用該收入或資產，除非該項分配或運用是依據該實體所進行的慈善活動而作出的；或作為支付已提供的服務的合理補償的；或作為該實體以公平市價購買任何物業的付款的；及
- (v) the applicable laws of the NFE's jurisdiction of residence (or the NFE's formation documents) require that, upon the NFE's liquidation or dissolution, all of its assets be distributed to a governmental Entity or other non-profit organisation, or escheat to the government of the NFE's jurisdiction of residence or any political subdivision.  
該非財務實體的居留司法管轄區的適用法律（或該非財務實體的成立文件）規定，該非財務實體一旦清盤或解散，其所有資產均須分配予某政府實體或其他非牟利組織，或須交還予該居留司法管轄區的政府，或該政府的政治分部。

### 3. “Control” 「控權」

“Control” over an Entity is generally exercised by the natural person(s) who ultimately has a controlling ownership interest (typically on the basis of more than a certain percentage (e.g. 25%)) in the Entity. Where no natural person(s) exercises control through ownership interests, the Controlling Person(s) of the Entity will be the natural person(s) who exercises control of the Entity through other means. Where no natural person(s) is/are identified as exercising control of the Entity through ownership interests, the Controlling Person of the Entity is deemed to be the natural person who holds the position of senior managing official or exercises ultimate control over the management of the Entity.

自然人對某實體的「控權」，通常透過其在實體的控制擁有權權益（一般指超過某個百分比（例如：25%）為基準）行使。如沒有自然人透過擁有權權益行使控制，該實體的控權人將會是透過其他方式對該實體行使控制的自然人；如沒有自然人識辨為透過擁有權權益對某實體行使控制，該實體的控權人將會設定為處於高級行政人員位置或對該實體的管理行使最終控制權的自然人。

### 4. “Controlling Person(s)” 「控權人」

“Controlling Persons” are the natural person(s) who exercise control over an Entity. In the case of a partnership, the Controlling Person(s) are all individuals who exercise control over a partnership, regardless of the stake held in terms of capital/profits/voting rights of/in that partnership. In the case of a trust, the Controlling Person(s) are the settlor(s), the trustee(s), the protector(s) or enforcer(s) (if any), the beneficiary(ies) or class(es) of beneficiaries, or any other natural person(s) exercising ultimate effective control over the trust (including through a chain of control or ownership). The settlor(s), the trustee(s), the protector(s) or enforcer(s) (if any), and the beneficiary(ies) or class(es) of beneficiaries, must always be treated as Controlling Persons of a trust, regardless of whether or not any of them exercises control over the activities of the trust.

「控權人」指對該實體行使控制權的自然人。就合夥人而言，「控權人」指所有對其合夥行使控制權的個人，不論其有權享有或控制該合夥資本/利潤/表決權的程度。就信託而言，「控權人」指屬該信託的財產授予人、受託人、保護人或執行人（如有的話）、受益人或某類別受益人的成員的個人；或任何自然人對該信託的管理行使最終控制權（包括透過一連串的控制或擁有權）。財產授予人、受託人、保護人或執行人（如有的話）、受益人或某類別受益人的成員的個人會被視為信託的「控權人」，不論該等人士是否對該信託的活動行使控制權。

Where the settlor, trustee, protector or enforcer, or beneficiary of a trust are themselves Entities then the Controlling Persons of the settlor, trustee, protector or enforcer, or beneficiary must be treated as Controlling Persons of the trust.

如財產授予人、受託人、保護人或執行人、或受益人為實體，財產授予人、受託人、保護人或執行人、或受益人的「控權人」會被視為信託的「控權人」。

In the case of a legal arrangement other than a trust, “Controlling Person(s) means persons in equivalent or similar positions to those of a trust. 就並非信託的法律安排，「控權人」指相等於或處於一個相類於信託的人士。

### 5. “Custodial Institution” 「託管機構」

The term “Custodial Institution” means any Entity that holds, as a substantial portion of its business, financial assets for the account of others. This is where the Entity's gross income attributable to the holding of financial assets and related financial services equals or exceeds 20% of the Entity's gross income during the shorter of: (a) the three-year period that ends on 31 December (or the final day of a non-calendar year accounting period) prior to the year in which the determination is being made; or (b) the period during which the Entity has been in existence.

「託管機構」一詞指符合以下說明的實體：該實體為他人的帳戶持有財務資產，而如此持有該等財務資產，在其業務中佔相當大部分。在這情況下，該實體可歸因於持有財務資產及相關的財務服務的總收入，相等於或超過該實體在以下期間（兩者中以較短者為準）的總收入的20%：(a) 在斷定某實體是否託管機構的年份之前的、截至12月31日（或非公曆年會計期的最後一日）為止的3年期間；(b) 該實體存在的期間。

### 6. “Depository Institution” 「存款機構」

The term “Depository Institution” means an authorized institution as defined by section 2(1) of the Banking Ordinance (Cap. 155) or any Entity that accepts deposits in the ordinary course of a banking or similar business.

「存款機構」一詞指《銀行業條例》（第155章）第2(1)條所界定的認可機構；或在銀行業務或相類業務的通常運作中接受存款的實體。

### 7. “Entity” 「實體」

The term “Entity” means (a) an entity, other than a natural person, that can establish a permanent customer relationship with a Financial Institution or otherwise own property; or (b) a legal arrangement; and includes a corporation, partnership and any other body of persons (incorporated or unincorporated) and a trust.

「實體」一詞指 (a) 某並非自然人的實體，而該實體可與某財務機構建立永久的客戶關係，或該實體本身可擁有財產；或 (b) 某法律安排；及包括法團、合夥及任何其他團體（不論是否屬法團）及信託。

### 8. “Financial Institution” 「財務機構」

The term “Financial Institution” means a “Custodial Institution”, a “Depository Institution”, an “Investment Entity”, or a “Specified Insurance Company”.

「財務機構」一詞指「託管機構」、「存款機構」、「投資實體」或「指明保險公司」。



## 9. “Investment Entity” 「投資實體」

The term “Investment Entity” means:

「投資實體」一詞指：

- (a) a corporation licensed under the Securities and Futures Ordinance (Cap. 571) to carry out one or more of the following regulated activities – 根據《證券及期貨條例》(第571章)獲發牌進行一項或多於一項以下受規管活動的法團 –
- (i) dealing in securities; 證券交易;
  - (ii) trading in futures contracts; 期貨合約買賣;
  - (iii) leveraged foreign exchange trading; 槓桿式外匯交易;
  - (iv) asset management; 資產管理;
- (b) an institution registered under the Securities and Futures Ordinance (Cap. 571) to carry out one or more of the following regulated activities – 根據《證券及期貨條例》(第571章)獲註冊進行一項或多於一項以下受規管活動的機構 –
- (i) dealing in securities; 證券交易;
  - (ii) trading in futures contracts; 期貨合約買賣;
  - (iii) asset management; 資產管理;
- (c) a collective investment scheme authorized under the Securities and Futures Ordinance (Cap. 571); 根據《證券及期貨條例》(第571章)獲認可的集體投資計劃;
- (d) an Entity that primarily conducts as a business one or more of the following activities or operations for or on behalf of a customer: 符合以下說明的實體：主要為或代表其客戶從事一項或多於一項以下活動，或主要為或代表其客戶運作一項或多於一項以下項目，作為業務：
- (i) trading in money market instruments (cheques, bills, certificates of deposit, derivatives, etc.); foreign exchange; exchange, interest rate and index instruments; transferable securities; or commodity futures trading; 買賣貨幣市場工具(如支票、匯票、存款證及衍生工具等)、外匯、兌換、息率及指數工具、可轉讓證券及商品期貨;
  - (ii) individual and collective portfolio management; or 個人及集體投資組合管理;
  - (iii) otherwise investing, administering, or managing financial assets or money on behalf of other entity or individual. Such activities or operations do not include rendering non-binding investment advice to a customer. 以其他方式，代其他實體或個人投資、處理或管理財務資產或金錢。該等活動或運作並不包括向客戶提供非約束性投資諮詢。
- (e) the second type of “Investment Entity” (“Investment Entity managed by another Financial Institution”) is any Entity the gross income of which is primarily attributable to investing, reinvesting, or trading in financial assets where the Entity is managed by another Entity that is a Depository Institution, a Custodial Institution, a Specified Insurance Company, or an Investment Entity described in (a), (b), (c) or (d) above. 另一類投資實體(由另一財務機構管理的投資實體)是指其總收入主要可歸因於財務資產的投資、再投資或買賣並由另一存款機構、託管機構、指明保險公司或屬上述(a)、(b)、(c)及(d)項所述的投資實體管理的實體。

## 10. “Investment Entity managed by another Financial Institution and located in a non-Participating Jurisdiction”

「位於非參與稅務管轄區並由另一財務機構管理的投資實體」

The term “Investment Entity that is managed by another Financial Institution and located in a Non-Participating Jurisdiction” means any Entity the gross income of which is primarily attributable to investing, reinvesting, or trading in financial assets if the Entity is (a) managed by a Financial Institution and (b) not a Participating Jurisdiction Financial Institution.

「位於非參與稅務管轄區並由另一財務機構管理的投資實體」一詞指其總收入主要可歸因於財務資產的投資、再投資或買賣的實體且該實體是 (a) 由一個財務機構管理；及 (b) 非參與稅務管轄區財務機構。

## 11. “Investment Entity managed by another Financial Institution” 「由另一財務機構管理的投資實體」

An Entity is “managed by” another Entity if the managing Entity performs, either directly or through another service provider on behalf of the managed Entity, any of the activities or operations described in paragraph (d) above in the definition of “Investment Entity”.

如果一個實體直接或通過另一服務提供者代表另一實體進行任何上述投資實體的定義(d)項所述的活動或運作，則該另一實體會被視為由該管理實體所管理。

An Entity only manages another Entity if it has discretionary authority to manage the other Entity’s assets (either in whole or part). Where an Entity is managed by a mix of Financial Institutions, NFEs or individuals, the Entity is considered to be managed by another Entity that is a Depository Institution, a Custodial Institution, a Specified Insurance Company, or an Investment Entity described in (a), (b), (c) or (d) above, if any of the managing Entities is such another Entity.

一個實體只有在有權自行管理另一實體的部分或全部資產的情況下，才會被視為可管理該另一實體。當一個實體由財務機構、非財務實體或個人的組合管理時，如果某一管理實體為存款機構、託管機構、指明保險公司或屬上述(a)、(b)、(c)及(d)項所述的投資實體的實體，則該實體會被視為由另一實體管理。

## 12. “NFE” 「非財務實體」

An “NFE” is any Entity that is not a Financial Institution.

「非財務實體」指並非財務機構的實體。

## 13. “Participating Jurisdiction” 「參與稅務管轄區」

A “Participating Jurisdiction” means a jurisdiction outside Hong Kong that is specified in Part 2 of Schedule 17E of the Inland Revenue Ordinance (Cap. 112).

「參與稅務管轄區」指稅務條例(第112章)附表17E第2部所指明的、在香港以外的稅務管轄區。

#### 14. “Participating Jurisdiction Financial Institution” 「參與稅務管轄區財務機構」

The term “Participating Jurisdiction Financial Institution” means (a) any Financial Institution that is tax resident in a Participating Jurisdiction, but excludes any branch of that Financial Institution that is located outside of that jurisdiction, and (b) any branch of a Financial Institution that is not tax resident in a Participating Jurisdiction, if that branch is located in such Participating Jurisdiction.

「參與稅務管轄區財務機構」一詞指：(a) 任何居於某參與稅務管轄區的財務機構，但不包括有關財務機構位於該管轄區境外的分支機構；及 (b) 某財務機構位於某參與稅務管轄區的任何分支機構，而該財務機構並非居於該管轄區。

#### 15. “Passive NFE” 「被動非財務實體」

A “Passive NFE” means any: (a) NFE that is not an Active NFE; and (b) Investment Entity located in a non-Participating Jurisdiction and managed by another Financial Institution.

「被動非財務實體」指任何：(a) 不屬主動非財務實體的非財務實體；及 (b) 位於非參與稅務管轄區並由另一財務機構管理的投資實體。

#### 16. “Related Entity” 「有關連實體」

An Entity is a “Related Entity” of another Entity if (a) Entity controls the other Entity, or (b) the two Entities are under common control, or (c) the two Entities are investment entities as described in paragraph (e) of the definition of investment entity and the entities are under common management; and the management fulfils the due diligence requirements for the entities under Schedule 17D. For this purpose control includes direct or indirect ownership of more than 50% of the vote and value in an Entity.

若 (a) 某實體控制另一實體，或 (b) 兩個實體共同受同一人控制，或 (c) 兩個實體均屬上述投資實體的定義的(e)段所描述的投資實體，而它們共同受同一管理層所管理；及該管理層符合附表17D所指的關於該兩個實體的盡職審查規定，則該實體是另一實體的「有關連實體」。就此而言，控制可透過直接或間接持有某實體超過50%的表決權或股份的价值。

#### 17. “Resident for tax purposes” 「稅務居民」

Generally, an Entity will be resident for tax purposes in a jurisdiction if, under the laws of that jurisdiction (including tax conventions), it pays or should be paying tax therein by reason of his domicile, residence, place of management or incorporation, or any other criterion of a similar nature, and not only from sources in that jurisdiction. An Entity such as a partnership, limited liability partnership or similar legal arrangement that has no residence for tax purposes shall be treated as resident in the jurisdiction in which its place of effective management is situated. A trust is treated as resident where one or more of its trustees is resident. For additional information on tax residence, please talk to your tax adviser or refer to the OECD Automatic Exchange Portal at the following link: <http://www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/>

一般而言，如根據某個稅務管轄區的規定(包括稅收協定)，任何實體不僅就以有關稅務管轄區為來源的收入，亦因其居籍、居所、管理工作地點、成立為法團地點，或任何性質類似的其他準則，在有關稅務管轄區需要繳稅或有繳稅責任，便會成為該稅務管轄區的稅務居民。沒有稅務居民身份的實體，例如：合夥、有限法律責任合夥或類似的法律安排，應被視為其實際管理地點所在稅務管轄區的稅務居民。一個信託應被視為一個或多於一個受託人居住的稅務管轄區的居民。有關稅務居民身分的更多資訊，請聯絡閣下的稅務顧問或瀏覽經濟合作與發展組織的自動交換資料網站：<http://www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/>

#### 18. “Specified Insurance Company” 「指明保險公司」

The term “Specified Insurance Company” means any Entity that is an insurance company (or the holding company of an insurance company) that issues, or is obliged to make payments with respect to, a cash value insurance contract or an annuity contract.

「指明保險公司」一詞指任何屬保險公司的實體，或屬某保險公司的控股公司的實體，而該實體發出現金價值保險合約或年金合約，或有責任就現金價值保險合約或年金合約付款。

#### 19. “TIN” (including “functional equivalent”) 「稅務編號」(包括具有等同功能的識辨編號)

The term “TIN” means Taxpayer Identification Number or a functional equivalent in the absence of a TIN. A TIN is a unique combination of letters or numbers assigned by a jurisdiction to an individual or an Entity and used to identify the individual or Entity for the purposes of administering the tax laws of such jurisdiction. Further details of acceptable TINs can be found at the OECD Automatic Exchange Portal at the following link: <http://www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/>

「稅務編號」一詞指納稅人的識辨編號或具有等同功能的識辨編號(如無納稅人的識辨編號)。稅務編號是稅務管轄區向個人或實體分配獨有的字母與數字組合，用於識別個人或實體的身分，以便實施該稅務管轄區的稅務法律。有關可接受的稅務編號的更多詳細資訊刊載於經濟合作與發展組織的自動交換資料網站：<http://www.oecd.org/tax/automatic-exchange/crs-implementation-and-assistance/>

Some jurisdictions do not issue a TIN. However, these jurisdictions often utilise some other high integrity number with an equivalent level of identification (a “functional equivalent”). Examples of that type of number include –

某些稅務管轄區不發出稅務編號。但是，這些稅務管轄區通常使用具有等同識辨功能的其他完整號碼(「具有等同功能的識辨號碼」)。此類號碼的例子包括：

- (a) (for individuals) a social security/insurance number, citizen/personal identification/service code/number, and resident registration number.  
就個人而言，社會安全號碼/保險號碼、公民/個人身份/服務代碼/號碼，以及居民登記號碼。
- (b) (for Entities) a business/company registration code/number.  
就實體而言，商業/公司登記代碼/號碼。