ATTACHMENT FOR COOK ISLANDS
(Rev. October 2026)

1. QI is subject to the following legislation, regulations, and official KYC guidance governing the requirements of QI to obtain documentation confirming the identity of QI's account holders.

   - Financial Transactions Reporting Act 2017, as amended, including the Financial Transactions Reporting Amendment Act 2017 and the Financial Transactions Reporting Amendment Act 2024 (2024, No. 10);
   - Financial Transactions Reporting Regulations 2017, as amended, including the Financial Transactions Reporting Amendment Act 2024 (2024, No. 10); and
   - Financial Transactions Reporting Practice Guidelines issued by the Financial Intelligence Unit in conjunction with the Financial Supervisory Commission pursuant to section 65 of the Financial Transactions Reporting Act 2017, to the extent relevant to customer identification and verification.

2. QI represents that the legislation, regulations, and KYC requirements identified above are administered, supervised, and enforced, as applicable, by the following bodies, and QI shall provide the IRS with an English copy of any relevant report or other documentation issued by those bodies that relates to QI's functions as a qualified intermediary.

   - Cook Islands Financial Intelligence Unit (CIFIU)
   - Cook Islands Financial Supervisory Commission (CIFSC)

3. QI represents that the following penalties apply to failure to obtain, maintain, or evaluate documentation as required under the laws and regulations identified in item 1 above.

   - For an individual, a fine not exceeding NZD 250,000, or imprisonment for a term not exceeding 5 years, or both.
   - In any other case, a fine not exceeding NZD 1,000,000.

4. QI shall use the following specific documentary evidence (and any specific documentation added by an amendment to this item 4 as agreed to by the IRS) to comply with section 5 of this Agreement, provided that the documentary evidence satisfies the requirements of the laws and regulations identified in item 1 above. In the case of a foreign person, QI may instead use an applicable Form W-8 in accordance with section 5 of this Agreement. Either QI, or a banking or securities association in the Cook Islands, may request an amendment of this item 4.

   For a natural person:
   - A certified copy of a valid and current government-issued photographic identification document, limited to a passport, driving licence, national identity card, or Military Forces identity card; and
   - A copy of a recent rates, tax, or utility bill (except a mobile telephone bill) showing the person's name and permanent residential address; or
   - A copy of a bank statement showing the person's name and address where the customer has

maintained a relationship for at least 12 months; or
- A copy of another independent-source document showing the person's name and residential address.

For a legal person:
- A certified copy of the certificate of incorporation, registration or organisation, or other similar document;
- A copy of the register of directors, council members, members, or partners;
- A copy of the memorandum and articles of association, articles of organisation, limited liability company reports, partnership agreement, or other similar constitutional or governing document;
- A copy of a recent rates, tax, or utility bill showing the legal person's name, mailing address, and place of business, or the most recent annual return, or audited financial statements showing the legal person's name, directors, and registered address;
- Ownership, voting, and control information sufficient to identify the ultimate principal or principals in accordance with section 8 of the Financial Transactions Reporting Act 2017 and Regulation 6 of the Financial Transactions Reporting Regulations 2017 as replaced in 2024, including the 25% ownership or voting-rights route, control by other means, and the senior-managing-official fallback, as applicable; and
- For each ultimate principal and each natural person acting on behalf of the legal person, the natural person identification and verification evidence specified above, to the extent required by Cook Islands law and the QI Agreement.

For trust or other legal arrangement:
- A certified copy of the trust deed or relevant extracts, registration record, or other instrument by which the trust or legal arrangement was established and that evidences the appointment and powers of the trustees or equivalent persons;
- Records sufficient to identify each constituent or settlor, each trustee, each protector (if any), each beneficiary required to be identified under Regulation 6, and any other natural person exercising ultimate effective control; where a relevant function is performed by a legal person or legal arrangement, records sufficient to identify the ultimate principals of that person or arrangement;
- Natural-person verification evidence specified above for each ultimate principal required to be identified and verified;
- For a discretionary or charitable legal arrangement, or one with more than 10 beneficiaries, sufficient information about the characteristics of the beneficiaries or class to permit identification and verification of a beneficiary before a distribution, together with a description of the objects of the arrangement; and
- A certified copy of a recent bank statement showing the trustees' mailing address, if applicable.

For a foundation:
- A certified copy of the certificate of registration, the register of foundation board or council members, the register or other record of ultimate principals, the foundation instrument and foundation rules;
- Records sufficient to identify each founder, each member of the foundation board or council, each beneficiary required to be identified under Regulation 6, and any other natural person exercising ultimate effective control; where a relevant function is performed by a legal

person or legal arrangement, records sufficient to identify the ultimate principals of that person or arrangement;

- Natural-person verification evidence specified above for each ultimate principal required to be identified and verified; and
- For a discretionary or charitable foundation, or one with more than 10 beneficiaries, sufficient information about the characteristics of the beneficiaries or class to permit identification and verification of a beneficiary before a distribution, together with a description of the objects of the foundation.

5. QI shall follow the procedures set forth below (and any procedures added by an amendment to this item 5 as agreed to by the IRS) to confirm the identity of account holders that do not open accounts in person or who provide new documentation for existing accounts other than in person. In the case of a foreign person, QI may instead use an applicable Form W-8 in accordance with section 5 of this Agreement. Either QI, or a banking or securities association in the Cook Islands, may request an amendment to this item 5.

   (i) QI shall not open an account by any means other than by establishing in person the identity of a customer through the account holder's own identity documents, except as permitted in paragraphs (ii) through (vi) below.

   (ii) QI may obtain by mail or otherwise a copy that is an exact reproduction of the specific documentary evidence listed in item 4 above from another person that is subject to know-your-customer rules approved by the IRS for purposes of qualified intermediary agreements, provided that Cook Islands law permits QI to rely on the other person to identify the account holder.

   (iii) QI may obtain remotely from the account holder or a person acting on behalf of the account holder a photocopy or scanned copy of the specific documentary evidence listed in item 4, provided that the document has first been certified as a true and correct copy by a person whose authority to make the certification appears on the copy and Cook Islands law permits QI to rely on the certified copy. Where a hard-copy certified document is scanned and transmitted electronically, QI shall apply risk-based checks to the authenticity of the document and transmission, including appropriate consideration of file integrity or tamper resistance and the apparent legitimacy and customer connection of the sending source.

   (iv) QI may obtain by mail or otherwise a copy that is an exact reproduction of the specific documentary evidence listed in item 4 from an affiliate of QI or a correspondent bank of QI, provided that the affiliate or correspondent bank has established in person the identity of the account holder and Cook Islands law permits QI to rely on documentation provided by that affiliate or correspondent bank.

   (v) QI may use independent electronic data sources to authenticate or corroborate documentary evidence and customer identity or address information, including appropriate official registries, passport and driving-licence issuing authorities, companies registries, electoral rolls, and other electronic databases where QI has assessed the depth, breadth, and quality of the data and can determine the checks performed and their results. Electronic-source checking does not by itself dispense with QI's obligation to be satisfied that the account holder is the person identified by the

evidence and to comply with the QI Agreement.

(vi) For accounts opened prior to 1 January 2001, if QI was not required under its know-your-customer rules to maintain originals or copies of documentation, QI may rely on its account information if it has complied with all other aspects of its know-your-customer rules regarding establishment of an account holder's identity, it has a record that the documentation required under those rules was actually examined by an employee of QI, or an employee of an affiliate of QI or a correspondent bank of QI, in accordance with those rules, and QI has no information in its possession that would require it to treat the documentation as invalid under section 5.10(B) of the QI Agreement.