

SCHEDULE THREE - SERVICES

We set out below the FATCA and CRS services that we will provide to the Serviced Entities.

Our Service	Client Responsibility
Onboarding	
Nominate a point of contact from each party	
Review existing Risk Matrix and KYC templates, identify and discuss any material differences vs. The ID Register.	Record the profile ID of each investor against an internal record and adapt existing processes to update TIDR for transfers and new funds.
Migrate profiles into TIDR using our standard upload template, de-duplicate pre-existing profiles and provide an extract to demonstrate faithful data transfer.	Provide fund and investor profile information, ideally in excel, together with associated contacts for each profile.
Migrate documents into TIDR using our standard upload template, de-duplicate pre-existing documents and provide an extract to demonstrate faithful data transfer.	Provide documents, ideally in PDF and with a logical structure or naming convention that can be mapped to each profile.
Provide comprehensive training materials and introductory assistance where required leading up to a defined Go-Live date.	Review the training material, attend training sessions, adapt existing processes where necessary and agree a Go-Live date.
KYC	
Provide draft Investor Introduction Email	Introduce Investors by email to TIDR and provide contact details at the Client for confirmation if required.
Contact every investor by email in order to request their due diligence.	
Issue up to two reminders by email and contact the investor by telephone or by email where these details are available.	Follow-up with investors who have not responded to these reminders.
Provide a telephone number and email address for investors to contact us with any questions. An answering message will be available outside normal UK business hours and we will endeavour to respond to all queries within one working day.	Direct any questions to TIDR.
Obtain CDD from each investor in line with all applicable standards via a personalised profile on www.theIDregister.com or in hard copy if necessary.	Review each profile and encourage investors to complete any gaps where they have not already done so when reminded by TIDR.
Obtain a due diligence profile from each investor in line with the indicia specified within the FATCA and Common Reporting Standard legislation on www.theIDregister.com or in hard copy if necessary.	

Assist with the risk assessment of each profile and follow up any queries directly with the investor.	MLRO review of TIDR's moderated risk assessment and determine client-specific rating.
Screen all investors and their connected parties, where disclosed, every day against the main global sanctions lists including OFAC and HM Treasury and provide a report to the MLRO of each fund.	Receive sanction hit alerts and action according to Client's internal process.
Provide a full online CDD pack for each investor which will include their profile, risk assessment, evidence of identity and sanctions screening results for final review by the MLRO of each fund. The pack will also contain an assessment of the reporting status of each investor under FATCA, UK FATCA and CRS.	Review profile data using "Download My Profiles" and by viewing and/or downloading the investor PDF packs online.
Maintain triggers in the ID Register that require the Investor to maintain an up to date profile of a frequency of at least 1 to 4 years depending on our assessment of the investor's risk, the type of evidence documents and also on any trigger events that may occur, such as transfers of investment or updates to the investor's online profile	Review last modification date for all profiles on "Download My Profiles", together with the expiry date and status of the evidence documents and encourage investors to update their profile where they have not already done so for TIDR.
FATCA & CRS	
FATCA and CRS Classification of all Serviced Entities.	Review and adopt classifications.
FATCA and CRS Registration of all Serviced Entities as required.	
Assess the reporting status of each account-holder profile against the indicia specified within the FATCA, UK FATCA and Common Reporting Standard legislation and report to the board of each fund.	Review the status of each account holder through the FATCA Investigation Summary report and FATCA Dashboard screens.
Produce and submit FATCA and CRS XML reports across all relevant jurisdictions.	Provide account balance and payments during the year for each account holder in a format compatible with the import/export function on TIDR.
Annual Review of all FATCA/CRS Classifications and Reporting by KPMG.	