

Substitute IRS Form W-8BEN-E

Do NOT use this form for:

- U.S. entity or U.S. citizen or resident W-9
- A foreign individual W-8BEN (Individual)
- A foreign individual or entity claiming that income is effectively connected with the conduct of trade or business within the U.S. W-8ECI

Instead use IRS Form:

Account holder information required for self-certification and substitute Form W-8BEN-E

| Part I Identification of Beneficial Owner | | |
|---|----------|---|
| 1. Name of Organization that is the beneficial owner | | 2. Country of incorporation or organization |
| 3. Permanent residence address (street, apt, or suite no., or rural route). Do not use a P.O. box or in-care-of address (other than a registered address) | | |
| City or town, state or province. Included postal code where appropriate | | Country |
| 4. Mailing address (if different from above) | | |
| City or town, state or province. Included postal code where appropriate | | Country |
| 5. U.S. taxpayer identification number (TIN) | 5a. GIIN | 5b. Non-US TIN |
| 6. Reference number(s) (see instructions) | | |

| Part II Chapter 3 Status (entity type) | | | |
|---|--|--|-----------------------------------|
| <input type="radio"/> Simple trust | <input type="radio"/> Grantor trust | <input type="radio"/> Corporation | <input type="radio"/> Partnership |
| <input type="radio"/> Central Bank of issue | <input type="radio"/> Tax-exempt organization | <input type="radio"/> Complex Trust | <input type="radio"/> Estate |
| <input type="radio"/> Private foundation | <input type="radio"/> International organization | <input type="radio"/> Disregarded entity | <input type="radio"/> Government |

Certification

Under penalties of perjury, I declare that I have examined the information on this form and to the best of my knowledge and belief it is true, correct, and complete. I further certify under penalties of perjury that:

- The entity identified on line 1 of this form is the beneficial owner of all the income to which this form relates, is using this form to certify its status for chapter 4 purposes, or is a merchant submitting this form for purposes of section 6050W;
- The entity identified on line 1 of this form is not a U.S. person;
- The income to which this form relates is: (a) not effectively connected with the conduct of a trade or business in the United States, (b) effectively connected but is not subject to tax under an income tax treaty, or (c) the partner's share of a partnership's effectively connected income; **and**
- For broker transactions or barter exchanges, the beneficial owner is an exempt foreign person as defined in the instructions.

Furthermore, I authorize this form to be provided to any withholding agent that has control, receipt, or custody of the income of which the entity on line 1 is the beneficial owner or any withholding agent that can disburse or make payments of the income of which the entity on line 1 is the beneficial owner.

I agree that I will submit a new form within 30 days if any certification on this form becomes incorrect.

Self-certification for FATCA purposes

1. If the entity is a registered financial institution, please tick one of the below categories, and provide the entity's FATCA GIIN below.

- IGA partner jurisdiction financial institution
- Registered-deemed compliant Foreign Financial Institution (FFI)
- Participating Foreign Financial Institution (FFI)

2. Please provide your Global Intermediary Identification Number (GIIN) if applicable: _____

3. If the entity is a financial institution but unable to provide a GIIN, please tick one of the below reasons:

- The entity is a non-participating FFI
- The entity is a certified deemed-compliant, or otherwise non-reporting, FFI (including a FFI deemed compliant under Annex II of an IGA, except for a trustee documented trust or sponsored FFI.). Indicate exemption: _____

4. If the entity is not an FFI, please confirm the entity's FATCA status below:

- The entity is an exempt beneficial owner. Indicate status: _____.
- The entity is an active non-financial foreign entity (NFFE) (including an exempted NFFE and publicly traded NFFE).
- The entity is a passive non-financial foreign entity.

For passive NFFE only: Provide U.S. controlling person/substantial U.S. owner information

| Name (First and Last) | Permanent residence address (include City and Country) | SSN/U.S. Tax Identification Number |
|-----------------------|--|------------------------------------|
| First: Last: | Address: City: Country: | |
| First: Last: | Address: City: Country: | |
| First: Last: | Address: City: Country: | |
| First: Last: | Address: City: Country: | |
| First: Last: | Address: City: Country: | |

Declaration of FATCA self-certification

I declare (as an authorized signatory of the entity) that the information provided in this form is, to the best of my/our knowledge and belief, accurate and complete. I undertake to advise the recipient promptly and provide an updated Self-Certification form within 30 days where any change in circumstances occurs, which causes any of the information contained in this form to be inaccurate or incomplete. Where legally obligated to do so, I hereby consent to the recipient sharing this information with the relevant tax information authorities.

I certify that I have the capacity to sign for the entity identified on line 1 of this form.

The Internal Revenue Service does not require your consent to any provisions of this document other than the certifications required to establish your status as a non-U.S. individual and, if applicable, obtain a reduced rate of withholding.

Sign
Here:

Signature of individual authorized to sign for beneficial owner

Print First and Last Name

Date



Appendix

List of Exempt Beneficial Owner statuses for Part 4 of the 'Self-Certification for FATCA purposes'

1. Governmental Entity
2. International Organization
3. Central Bank
4. Not for profit organization
5. Broad or Narrow Participation Retirement Fund
6. Pension Fund of an exempt beneficial owner
7. Investment Entity Wholly Owned by Exempt Beneficial Owners

Customer instructions for PayPal Substitute Form W-8BEN-E and FATCA Self Certification

The following provides direction for our customers in regard to completing PayPal’s substitute Form W-8BEN-E and FATCA self-certification. For additional guidance, please see the IRS Form W-8BEN-E instructions, [here](#).

Substitute Form W-8BEN-E Part 1

| Box Number | Required to be populated? <i>(Yes, No, Only When)</i> | Instructions | Example |
|--|--|--|--|
| Box 1 (Name of organization that is the beneficial owner) | Yes | <p>For Entities: Provide the full name of the entity that holds the account with PayPal. This name should be consistent with the account information for PayPal.</p> <p>Note: This substitute Form W-8BEN-E is <u>not</u> to be used by sole proprietorship or individual account holders. If you have been directed to complete a paper form on behalf of an individual or a sole proprietorship, please complete the current version of the IRS Form W-8BEN and upload or provide this file as required. The latest IRS Form W-8BEN can be found here. Please contact customer support if you need to provide a Form W-8BEN or different tax form.</p> | <p>CORRECT: The Alpha Corporation</p> <p>NOT CORRECT: Alpha (Not correct because the full name of the entity that holds the account with PayPal is not provided)</p> |
| Box 2 (Country of incorporation or organization) | Yes | <p>If you are a corporation, enter the full name of your country of incorporation. If you are another type of entity, enter the country under whose laws you are created, organized, or governed. For practical reasons an abbreviation of the jurisdiction is not be accepted, but an exception may be provided if other existing documentation available to PayPal can provide a clear conclusion of the actual country of incorporation.</p> | <p>CORRECT: United Kingdom, Luxembourg</p> <p>NOT CORRECT: UK, Lux (Not correct because the country of incorporation is abbreviated)</p> |
| Box 3 (Permanent residence address) | Yes | <p>Enter the permanent residence address of the entity identified on line 1. Your permanent address is the address in the country where you claim to be a resident for purposes of that country’s income tax. Do not show the address of a financial institution (unless you are a financial institution providing your own address), a post office box, or an address used solely for mailing purposes unless it is the only address you use and it appears in your organizational documents (that is, your registered address). If you do not have a tax residence in any country, the permanent residence address is where you maintain your principal office.</p> <p>If an entity’s permanent residence is located in the United States, normally the entity should not complete a Form W-8BEN-E and instead identify itself as a US entity and provide an IRS Form W-9 or equivalent. Please consult a tax advisor if you have questions.</p> | <p>CORRECT: The Alpha Corporation 14 Berkeley Street London, England W1T 1JY</p> <p>NOT CORRECT: The Alpha Corporation PO BOX 123 London, England W1T 1JY (not correct if a PO Box is used that is not the registered address)</p> <p style="margin-left: 200px;">The Alpha Corporation 2132, 33rd Ave New York, NY, 11101 (not correct because a US permanent address suggest the entity is a US entity. US entities should not use Forms W-8)</p> |

Substitute W-8BEN-E Part 1 (continued)

| Box Number | Required to be populated? (Yes, No, Only if) | Instructions | Example |
|---|--|--|--|
| Box 4 (Mailing address) | No | <p>Enter your mailing address only if it is different from the address on line 3.</p> <p>If the mailing address is in the U.S. you must also provide additional documentation to PayPal to demonstrate you are not a U.S. entity. If you provide a U.S. mailing address, please upload the entity's articles of incorporation, organizational or similar documents verifying the entity is incorporated or organized in a jurisdiction outside of the United States.</p> | <p>CORRECT: The Alpha Corporation PO BOX 123 London, England W1T 1JY</p> <p>NOT CORRECT: The Alpha Corporation (not correct unless additional documents are provided to show non-US organization or incorporation) 2132, 33rd Ave New York, NY, 11101</p> |
| Box 5 (U.S. Tax Identification Number) | No | Provide the Entity's US TIN if it has one. | <p>CORRECT Format for US TIN (example): 13-8908427 or 138908427 or</p> <p>NOT CORRECT: 1234VPO9W, 12345678, 123-45-678 (not correct because the TIN is not formatted like a US TIN)</p> |
| Box 5a. (GIIN) | Only to complete if the Account Holder identified in Line 1 of this form is registered as a financial Institution under FATCA | <p>Please provide your global intermediary identification number (GIIN) if you have one. You must provide a GIIN assigned to the entity by the IRS if the entity's FATCA classification is one of the following:</p> <ul style="list-style-type: none"> • IGA partner jurisdiction Financial Institution • Registered-deemed compliant Foreign Financial Institution • Participating Foreign Financial Institution (FFI) <p>Make sure the GIIN follows this format: XXXXX.XXXXX.XX.XXX</p> <p>If entity has applied for a GIIN but has not yet obtained one, it may write "applied for" in this box. A valid GIIN must be submitted by the account holder within 90 days of receiving the self-certification.</p> | <p>CORRECT: 1293FT.A0846.SP.109 OR Applied For</p> <p>NOT CORRECT: 14329570894 (not correct because the GIIN is not provided in the correct format as provided by the IRS)</p> |
| Box 5b. (Foreign TIN) | Not required for PayPal customers documenting their non-US status for 1099-K purposes. Only If the Account Holder is a Passive NFFE with US Substantial owners, and the Passive NFFE has a country of incorporation or organization of Canada or Brazil | <p>The entity's foreign (non-US) taxpayer identification number (TIN) should be provided if the entity's country of residence has issued the entity a Foreign TIN.</p> <p>The only instance when a Foreign TIN is required is if all the following circumstances apply:</p> <ul style="list-style-type: none"> • The entity claims a FATCA status of Passive Non-Financial Foreign Entity • The entity has provided a list of 1 more US controlling person in the Controlling Persons section of the Form • The entity has its country of incorporation or organization in Canada or Brazil, and • The foreign TIN has not already been collected by PayPal. | Foreign TIN formats vary by jurisdiction. |

Substitute W-8BEN-E Part 1 (continued)

| Box Number | Required to be populated? (Yes, No, Only if) | Instructions | Example |
|--|---|---|---------|
| Box 6 Reference Number(s) | No | Box 6 can be used by the customer to provide any information that may be useful to PayPal to document the account or to associate the Form Substitute W-8BEN-E with the PayPal account. | |

Substitute Form W-8BEN-E Part II – Chapter 3 Status

| | | | |
|----------------|-----------|---|--|
| Part II | No | <p>This field is optional and may be left blank. If you complete this field, check only one box indicating the type of entity that is listed on line 1 of the Form.</p> <p>If you are a disregarded entity for US tax purposes whose regarded owner is a US person or US entity, please provide an IRS Form W-9 for the US person or entity instead of this Form. Please contact customer support if you have questions.</p> | <p>CORRECT:</p> <p style="text-align: center;"> <input checked="" type="radio"/> Simple trust <input type="radio"/> Grantor trust <input type="radio"/> Corporation <input type="radio"/> Central Bank of Issue <input type="radio"/> Tax-exempt organization <input type="radio"/> Complex trust </p> <p>NOT CORRECT:</p> <p style="text-align: center;"> <input type="radio"/> Simple trust <input checked="" type="radio"/> Grantor trust <input checked="" type="radio"/> Corporation <input type="radio"/> Central Bank of Issue <input type="radio"/> Tax-exempt organization <input type="radio"/> Complex trust </p> <p style="text-align: center;">(Not correct because multiple entity types selected)</p> |
|----------------|-----------|---|--|

Self-Certification for FATCA purposes

| | | | |
|---------------|---|---|---|
| Line 1 | Only if the account holder is a registered Financial Institution | <p>Check only one box indicating the type of entity that is either a:</p> <ul style="list-style-type: none"> Intergovernmental Agreement (IGA) partner jurisdiction financial institution (such as a Reporting Model 1 or Reporting Model 2 FFI) Registered-deemed compliant Foreign Financial Institution Participating Foreign Financial Institution <p>Leave Line 1 blank if the entity is <u>not</u> a registered financial institution.</p> | <p>CORRECT for An IGA partner Jurisdiction Financial institution:</p> <p>1. If the entity is a registered financial institution, please tick one of the below categories, and provide the entity's FATCA GIN below.</p> <p style="text-align: center;"> <input checked="" type="radio"/> IGA partner jurisdiction financial institution <input type="radio"/> Registered-deemed compliant Foreign Financial Institution (FFI) <input type="radio"/> Participating Foreign Financial Institution (FFI) </p> <p>2. Please provide your Global Intermediary Identification Number (GIN) if applicable: _____</p> <p>3. If the entity is a financial institution but unable to provide a GIN, please tick one of the below reasons: <small>The entity is a certified deemed-compliant, or otherwise non-reporting, FFI (including a FFI deemed compliant under Annex II of an IGA, a documented trust or sponsored FFI.)</small></p> <p style="text-align: center;"> <input type="radio"/> Indicate exemption: _____ <input type="radio"/> The entity is a non-participating FFI. </p> <p>NOT CORRECT:</p> <p>1. If the entity is a registered financial institution, please tick one of the below categories, and provide the entity's FATCA GIN below.</p> <p style="text-align: center;"> <input type="radio"/> IGA partner jurisdiction financial institution <input type="radio"/> Registered-deemed compliant Foreign Financial Institution (FFI) <input checked="" type="radio"/> Participating Foreign Financial Institution (FFI) </p> <p>2. Please provide your Global Intermediary Identification Number (GIN) if applicable: _____</p> <p>3. If the entity is a financial institution but unable to provide a GIN, please tick one of the below reasons: <small>The entity is a certified deemed-compliant, or otherwise non-reporting, FFI (including a FFI deemed compliant under Annex II of an IGA, a documented trust or sponsored FFI.)</small></p> <p style="text-align: center;"> <input type="radio"/> Indicate exemption: _____ <input checked="" type="radio"/> The entity is a non-participating FFI. </p> <p style="text-align: center;">(Not correct because more than one box in Line 1, 3, and 4 is selected indicating a FATCA classification)</p> |
|---------------|---|---|---|

Self-Certification for FATCA purposes

| Box Number | Required to be populated? <i>(Yes, No, Only if)</i> | Directions | Example |
|---------------|--|--|--|
| Line 2 | <p>Only if the Account that is identified in Line 1 of the Self-Certification Holder is registered as a financial Institution for FATCA purposes.</p> | <p>A GIIN must be provided for any of these types of entity FATCA classifications provided on the PayPal self-certification:</p> <ul style="list-style-type: none"> • IGA partner jurisdiction Financial Institution • Registered-deemed compliant Foreign Financial Institution • Participating Foreign Financial Institution (FFI) <p>Make sure the GIIN follows this format: XXXXX.XXXXX.XX.XXX</p> <p>If you have applied for a GIIN but have not yet obtained one, you may write “applied for” in this box. A valid GIIN must be provided to PayPal within 90 days of providing this self-certification. If a GIIN is provided on Line 2 of the Self-certification, it should match the GIIN on Part 1, Line 5a. of the Substitute W-8BEN-E.</p> | <p>CORRECT (assuming the entity was issued a GIIN by the IRS or has applied for a GIIN): 1293FT.A0846.SP.109 OR Applied For</p> <p>NOT CORRECT: 14329570894 (not correct because the GIIN is not provided in the correct format as provided by the IRS, if required)</p> |
| Line 3 | <p>Only if the Account Holder is a financial Institution unable to provide a GIIN</p> | <p>Check only one box indicating the type of entity that is either a:</p> <ul style="list-style-type: none"> • Financial Institution exempt from having to provide a GIN • Non-participating FFI <p>If you checked the box that certifying the Financial Institution is exempt from having to provide a GIIN, the entity must indicate its exemption status on the line to the right. The exemption status are provided in the main body of line 3. Please refer to the FATCA instructions and definitions or local IGA guidance for more information on exemptions.</p> <p>Leave Line 3 blank if the entity is <u>not</u> a financial institution that is unable to provide a GIIN.</p> | <p>CORRECT (assuming the entity is a Certified Deemed Compliant FFI under an applicable IGA):</p> <p><small>3. If the entity is a financial institution but unable to provide a GIIN, please tick one of the below reasons: The entity is a certified deemed-compliant, or otherwise non-reporting, FFI (including a FFI deemed compliant under Annex II of an IGA, except for a trustee-documented trust or sponsored FFI.)</small></p> <p><input checked="" type="radio"/> Indicate exemption: <u>Certified Deemed Compliant FFI</u></p> <p><input type="radio"/> The entity is a non-participating FFI.</p> <p>NOT CORRECT:</p> <p><small>3. If the entity is a financial institution but unable to provide a GIIN, please tick one of the below reasons: The entity is a certified deemed-compliant, or otherwise non-reporting, FFI (including a FFI deemed compliant under Annex II of an IGA, except for a trustee-documented trust or sponsored FFI.)</small></p> <p><input checked="" type="radio"/> Indicate exemption: _____</p> <p><input type="radio"/> The entity is a non-participating FFI.</p> <p>(Not correct because an exemption is indicated, but an exemption explanation is not provided)</p> |

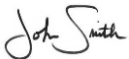
Self-Certification for FATCA purposes

| Box Number | Required to be populated? <i>(Yes, No, Only if)</i> | Directions | Example |
|---------------|---|---|--|
| Line 4 | Only if the Account Holder is an entity other than a Financial Institution | <p>Check only one box indicating the type of entity that is either a:</p> <ul style="list-style-type: none"> • Exempt Beneficial Owner • Active non-financial Foreign entity • Passive non-financial Foreign entity <p>Leave Line 4 blank if one of the entity types listed on line 4 does not apply. Please consult the FATCA definitions for more information.</p> <p>If you checked the line 4 box certifying that the entity is an exempt beneficial owner, you must indicate its exemption status from the list of exempt entities provided in the appendix to the self-certification. For more information on exempt beneficial owner status, see the FATCA definitions in these instructions or refer to the local guidance under the relevant IGAs noted in these instructions or consult a tax advisor.</p> <p>If you checked the box certifying that the entity is a Passive non-financial foreign entity, you must list its U.S. Controlling Persons / Substantial U.S. Owner information in the applicable section of the self-certification. For more information, see the FATCA definitions in these instructions or consult a tax advisor.</p> <p>You may only certify that the entity is a publicly traded entity or an affiliate of a publicly traded entity if the entity is traded on a qualified stock exchange.</p> <p>Please note: If the Self-certification does not provide a FATCA status by selecting one and only one box from lines 1, 3, or 4, the Self-certification for FATCA purposes will not be valid. Further, if more than one box is selected from lines 1, 3, or 4, the Self-certification for FATCA purposes will also not be valid.</p> | <p>CORRECT (assuming the account holder is Broad Participation Retirement Fund under an applicable IGA):</p> <p>4. If the entity is not an FFI, please confirm the entity's FATCA status below:</p> <ul style="list-style-type: none"> <input checked="" type="radio"/> The entity is an exempt beneficial owner. Indicate status: Broad Participation Retirement Fund <input type="radio"/> The entity is an active non-financial foreign entity (including an exempted NFFE and publicly traded NFFE). <input type="radio"/> The entity is a passive non-financial foreign entity. <p>4. If the entity is not an FFI, please confirm the entity's FATCA status below:</p> <ul style="list-style-type: none"> <input checked="" type="radio"/> The entity is an exempt beneficial owner. Indicate status: <input type="radio"/> The entity is an active non-financial foreign entity (including an exempted NFFE and publicly traded NFFE). <input type="radio"/> The entity is a passive non-financial foreign entity. <p>(Not correct because the “exempt beneficial owner” status was selected, but an exempt beneficial owner status is not provided)</p> |

For Passive NFFE Only: U.S. controlling person / substantial U.S. owner information

| Box Number | Required to be populated? <i>(Yes, No, Only if)</i> | Directions | Example |
|--|--|---|--|
| U.S. controlling persons/substantial U.S. owner information | Only if the Line 4 “passive non-financial foreign entity” is checked and the entity has Substantial US Owners or US Controlling Persons | <p>Leave blank if the account holder is either not a passive non-financial foreign entity OR the entity is a passive non-financial foreign entity and does not have any US Controlling Persons or Substantial US Owners as required. Please see the FATCA definitions for more information or consult with a tax advisor.</p> <p>Otherwise, if the entity is a passive non-financial foreign entity and has Substantial US Owners or US Controlling Persons:</p> <ul style="list-style-type: none"> List the First and Last name of each Substantial US Owner or US Controlling Person in the space provided. If providing this self certification to a PayPal entity in a jurisdiction governed by an IGA listed in Appendix 2 of these instructions, than US Controlling Persons must be provided. US Controlling Persons can only be a natural persons and cannot be an entity. Make sure a 9-digit US TIN is provided for each US Controlling Person or Substantial US Owner. The TIN format should be in the format of XXX-XX-XXXX. Make sure the City and Country in which the Controlling Person or Substantial US Owner resides is provided. | <p>CORRECT (assuming the entity is a passive NFFE with a US Controlling Person or Substantial US owner): John Smith 123 5th Ave New York, NY 138-90-8427</p> <p>NOT CORRECT: John 123 5th Ave New York, NY (Not correct because the US Controlling Person’s or Substantial US Owner’s TIN is not provided)</p> |

Declaration, Signature, Printed Name, Date and Certification of Capacity to sign

| | | | |
|----------------------|------------|--|--|
| Signature Box | Yes | <p>Make sure the form is signed and dated. It is required that in addition to the signature you print your name. Do not alter or delete any of the certifications.</p> | <p>CORRECT:  John Smith 7/7/17</p> <p>NOT CORRECT: John Smith 7/7/17 (Not correct because a signature must be provided)</p> |
|----------------------|------------|--|--|

Appendix 1 | Glossary: *The below provides general definitions to the terms used in the certification.*

For detailed definitions, please refer to an Intergovernmental Agreement (“IGA”) applicable to the jurisdiction where the PayPal account is maintained as noted in Appendix 2, or to Chapter 4 of the United States Internal Revenue Code, associated US Treasury Regulations, and other IRS Guidance.

| Term | Definition |
|--|--|
| Account Holder | <p>The named owner of the account that is listed or identified as the holder of a the account by the PayPal entity that maintains the account. PayPal’s policy’s and user agreements require that the named owner of a PayPal account be the owner of the account and that the named owner of a PayPal account is <u>not</u> holding the account for the benefit of another person unless an exception has been approved by PayPal. If the entity listed on line 1 of this Form is <u>not</u> the owner of the account or the PayPal account is being held for the benefit of someone other than the named owner on the account, this Substitute Form W-8BEN-E may not be appropriate for the account. Please contact PayPal customer service if you believe it is the case.</p> |
| Active Non-Financial Foreign Entity (Active NFFE) | <p>Any NFFE which is a Non U.S. entity that meets any of the following criteria:</p> <ul style="list-style-type: none"> a) Less than 50 percent of the NFFE’s gross income for the preceding calendar year or other appropriate reporting period is passive income and less than 50 percent of the assets held by the NFFE during the preceding calendar year or other appropriate reporting period are assets that produce or are held for the production of passive income; b) The stock of the NFFE is regularly traded on an established securities market or the NFFE is a Related Entity of an Entity the stock of which is traded on an established securities market; c) The NFFE is organized in a U.S. Territory and all of the owners of the payee are bona fide residents of that U.S. Territory; d) The NFFE is a non-U.S. government, a government of a U.S. Territory, an international organization, a non-U.S. central bank of issue, or an Entity wholly owned by one or more of the foregoing; e) Substantially all of the activities of the NFFE consist of holding (in whole or in part) the outstanding stock of, and 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 NFFE shall not qualify for this status if the NFFE 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; f) The NFFE is not yet operating a business and has no prior operating history, but is investing capital into assets with the intent to operate a business other than that of a Financial Institution; provided, that the NFFE shall not qualify for this exception after the date that is 24 months after the date of the initial organization of the NFFE; g) The NFFE was not a Financial Institution in the past five years, and is in the process of liquidating its assets or is reorganizing with the intent to continue or recommence operations in a business other than that of a Financial Institution; h) The NFFE 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 i) The NFFE is an “excepted NFFE” as described in relevant U.S. Treasury Regulations; or j) The NFFE meets all of the following requirements: <ul style="list-style-type: none"> i. It is established and maintained in its country 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 organization, business league, chamber of commerce, labor organization, agricultural or horticultural organization, civic league or an organization operated exclusively for the promotion of social welfare; ii. It is exempt from income tax in its country of residence; iii. It has no shareholders or members who have a proprietary or beneficial interest in its income or assets; iv. The applicable laws of the Entity’s country of residence or the Entity’s formation documents do not permit any income or assets of the Entity 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 Entity’s charitable activities, or as payment of reasonable compensation for services rendered, or as payment representing the fair market value of property which the Entity has purchased; and v. The applicable laws of the Entity’s country of residence or the Entity’s formation documents require that, upon the Entity’s liquidation or dissolution, all of its assets be distributed to a governmental entity or other non-profit organization, or escheat to the government of the Entity’s jurisdiction of residence or any political subdivision thereof. |

Appendix 1 | Glossary: *The below provides general definitions to the terms used in the certification.*

For detailed definitions, please refer to an Intergovernmental Agreement (“IGA”) applicable to the jurisdiction where the PayPal account is maintained as noted in Appendix 2, or to Chapter 4 of the United States Internal Revenue Code, associated US Treasury Regulations, and other IRS Guidance.

| Term | Definition |
|---------------------------------|---|
| Code | The U.S Internal Revenue Code of 1986, as amended. |
| Controlling Person | The natural persons who exercise direct or indirect control over an entity. In the case of a trust, such term means the settlor, the trustees, the protector (if any), the beneficiaries or class of beneficiaries, and any other natural person exercising ultimate effective control over the trust, and in the case of a legal arrangement other than a trust, such term means persons in equivalent or similar positions. The term 'Controlling Persons' shall be interpreted in a manner consistent with the Financial Action Task Force Recommendations (“FATF”). Please see the definition of Substantial US Owner below, also. |
| Entity | A legal person or a legal arrangement such as a trust. |
| Exempt Beneficial Owners | Includes Government entities, International Organisations, Central Bank, Broad Participation Retirement Funds, Narrow Participation Retirement Funds, Pension Funds of an Exempt Beneficial Owner, and Investment Entities wholly owned by Exempt Beneficial Owners under an applicable Intergovernmental Agreement (“IGA”) or under the US Treasury Regulations. Please refer to the IGA or US Treasury Regulations under Chapter 4 of the Code, as applicable, for detailed definitions. |
| Financial Institution | <p>A Custodial Institution, a Depository Institution, an Investment Entity, or a Specified Insurance Company, where:</p> <ul style="list-style-type: none"> a) <i>Custodial Institution</i> means any entity that holds, as a substantial portion of its business, financial assets for the account of others. An entity holds financial assets for the account of others as a substantial portion of its business if the entity’s gross income attributable to the holding of financial assets and related financial services equals or exceeds 20 percent of the Entity’s gross income during the shorter of: (i) 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 (ii) the period during which the entity has been in existence; b) <i>Depository Institution</i> means any entity that accepts deposits in the ordinary course of a banking or similar business; c) <i>Investment Entity</i> means any entity that conducts as a business (or is managed by an entity that conducts as a business) one or more of the following activities or operations for or on behalf of a customer: (1) 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; (2) individual and collective portfolio management; or (3) otherwise investing, administering, or managing funds or money on behalf of other persons. The term Investment entity shall be interpreted in a manner consistent with similar language set forth in the definition of “financial institution” in the Financial Action Task Force Recommendations; and d) <i>Specified Insurance Company</i> means any entity that is an insurance company (or the holding company of an insurance company) that issues, or is obligated to make payments with respect to, a Cash Value Insurance Contract or an Annuity Contract. |

Appendix 1 | Glossary: *The below provides general definitions to the terms used in the certification.*

For detailed definitions, please refer to an Intergovernmental Agreement (“IGA”) applicable to the jurisdiction where the PayPal account is maintained as noted in Appendix 2, or to Chapter 4 of the United States Internal Revenue Code, associated US Treasury Regulations, and other IRS Guidance.

| Term | Definition |
|--|---|
| <i>NFFE</i> | Any Non-U.S. Entity that is not a Financial Institution under FATCA as explained above under an applicable IGA or US Treasury Regulations. |
| <i>Non-U.S. Entity</i> | An Entity that is not a U.S. Person. |
| <i>Passive Non-Financial Foreign Entity</i> | Any NFFE that is not an Active Non-Financial Foreign Entity. |
| <i>Related Entity</i> | An entity is a Related Entity of another entity if either entity controls the other entity, or the two entities are under common control. For this purpose control includes direct or indirect ownership of more than 50 percent of the vote or value in an entity. Notwithstanding the foregoing, either Party may treat an entity as not a related entity if the two entities are not members of the same affiliated group, as defined in Section 1471(e)(2) of the Code. |
| <i>Specified U.S. Person</i> | <p>A U.S. Person other than:</p> <ul style="list-style-type: none"> a) a corporation the stock of which is regularly traded on established securities markets; b) any corporation that is a member of the same expanded affiliated group; c) the United States or any wholly owned agency or instrumentality thereof; d) any State of the United States, any U.S. Territory, any political subdivision or wholly owned agency or instrumentality of any one or more of the foregoing; e) any organization exempt from taxation under section 501 (a) of the Internal Revenue Code (the “Code”) or certain individual retirement plans defined in section 7701(a)(37) of the Code ; f) any bank as defined in section 581 of the Code; g) any real estate investment trust as defined in section 856 of the Code; h) any regulated investment company defined in section 851 of the Code or any entity registered with the U.S. Securities and Exchange Commission under the Investment Company Act of 1940; i) any common trust fund as defined in section 584(a) of the Code; j) any trust that is exempt from tax under section 664(c) of the Code or that is described in 4947(a)(1) of the Code; k) a dealer in securities, commodities, or derivative financial instruments that is registered as such under the laws of the United States or any State; l) a broker as defined in section 6045(c) of the Code; or m) any tax-exempt trust under a plan that is described in section 403(b) or section 457(g) of the Code |

Appendix 1 | Glossary: *The below provides general definitions to the terms used in the certification.*

For detailed definitions, please refer to an Intergovernmental Agreement (“IGA”) applicable to the jurisdiction where the PayPal account is maintained as noted in Appendix 2, or to Chapter 4 of the United States Internal Revenue Code, associated US Treasury Regulations, and other IRS Guidance.

| Term | Definition |
|---|--|
| U.S. Person | A U.S. citizen or resident individual, a partnership or corporation organized in the United States or under the laws of the United States or any State thereof, a trust if (i) a court within the United States would have authority under applicable law to render orders or judgments concerning substantially all issues regarding administration of the trust, and (ii) one or more U.S. persons have the authority to control all substantial decisions of the trust, or an estate of a decedent that is a citizen or resident of the United States. Refer to the U.S. Internal Revenue Code for further interpretation. |
| Disregarded Entity | A business entity that has a single owner and is not a corporation under Regulations section 301.7701-2(b) is disregarded as an entity separate from its owner. Generally, a disregarded entity does not submit this substitute Form W-8BEN-E to a withholding agent. An example of a disregarded entity can be considered a single-member LLC or a sole proprietorship. The IRS disregards the company as being separate from its owner for tax purposes. The company’s income, expenses, losses, gains, deductions and credits are reported on the owner’s IRS income tax return. |
| Global Intermediary Identification Number (GIIN) | A GIIN is a Global Intermediary Identification Number issued by the IRS that is assigned to a Financial Institution that enters into an FFI agreement with the IRS, or is in a participating Model 1 IGA jurisdiction. The GIIN is a 19-character identification number that is a composite of several other identifiers in the following format: XXXXXX.XXXXX.XX.XXX |
| Chapter 3 | Chapter 3 means chapter 3 of the Internal Revenue Code (Withholding of Tax on Nonresident Aliens and Foreign Corporations). Chapter 3 contains sections 1441 through 1464. |
| Chapter 4 | Chapter 4 means chapter 4 of the Internal Revenue Code (the “Foreign Account Tax Compliance Act” or “FATCA”). Chapter 4 contains sections 1471 through 1474 of the Code. |
| Substantial U.S. Owner | <p>A Substantial U.S. Owner (as defined in Regulations section 1.1473-1(b)) means any specified U.S. person that:</p> <ul style="list-style-type: none"> • Owns, directly or indirectly, more than 10 percent (by vote or value) of the stock of any foreign corporation; • Owns, directly or indirectly, more than 10 percent of the profits or capital interests in a foreign partnership; • Is treated as an owner of any portion of a foreign trust under sections 671 through 679; or • Holds, directly or indirectly, more than a 10 percent beneficial interest in a trust. <p>Note: Customers of PayPal Russia that are Passive NFFEs that have Substantial U.S. Owners must identify any Substantial U.S. Owners on the self-certification provided to PayPal. Customers of other PayPal entities should identify only Controlling U.S. persons, if any.</p> |

Appendix 2 | IGA Jurisdiction References:

The following provides references to intergovernmental agreements (IGAs) and FATCA guidance issued by jurisdictions where PayPal operates legal entities. Please consult your user agreement for your PayPal account to determine the IGA applicable to your PayPal account's FATCA classification and FATCA compliance obligations. If your account is not maintained in a jurisdiction that has entered an IGA, please refer to the IRS Form W-8BEN-E instructions located [here](#) or to Chapter 4 of the Code, associated US Treasury Regulations, and other IRS guidance for more information and guidance.

| Jurisdiction | Link to Jurisdiction IGA | Link to other jurisdiction references |
|-------------------|---|--|
| Australia | https://www.treasury.gov/resource-center/tax-policy/treaties/Documents/FATCA-Agreement-Australia-4-28-2014.pdf | Guidance notes: https://www.ato.gov.au/General/International-tax-agreements/In-detail/International-arrangements/Automatic-exchange-of-information---guidance-material/ Tax Authority Website: https://www.ato.gov.au/ |
| Brazil | https://www.treasury.gov/resource-center/tax-policy/treaties/Documents/FATCA-Agreement-Brazil-9-23-2014.pdf | Tax Authority Website: http://idg.receita.fazenda.gov.br/acesso-rapido/legislacao/legislacao-por-assunto/e-financeira |
| Canada | https://www.treasury.gov/resource-center/tax-policy/treaties/Documents/FATCA-Agreement-Canada-2-5-2014.pdf | Guidance notes: https://www.canada.ca/en/revenue-agency/services/tax/international-non-residents/enhanced-financial-account-information-reporting/reporting-sharing-financial-account-information-united-states/guidance-on-canada-s-enhanced-tax-information-exchange-agreement.html FAQs: http://www.fin.gc.ca/afc/faq/fatca-eng.asp Tax Authority Website: https://www.canada.ca/en/revenue-agency.html |
| Hong Kong | https://www.treasury.gov/resource-center/tax-policy/treaties/Documents/FATCA-Agreement-Hong%20Kong-11-13-2014.pdf | FAQs: http://www.fstb.gov.hk/fsb/topical/doc/fatca-faq2_e.pdf Tax Authority Website: http://www.ird.gov.hk/eng/welcome.htm |
| Luxembourg | https://www.treasury.gov/resource-center/tax-policy/treaties/Documents/FATCA-Agreement-Luxembourg-3-28-2014.pdf | Tax Authority Website: http://www.impotsdirects.public.lu/fr/echanges_electroniques/FATCA.html |

Appendix 2 | Jurisdiction References:

| Jurisdiction | Link to Jurisdiction IGA | Link to other jurisdiction references |
|------------------|---|--|
| <i>Mexico</i> | https://www.treasury.gov/resource-center/tax-policy/treaties/Documents/FATCA-Agreement-Mexico-4-17-2014.pdf | Tax Authority Website: http://www.sat.gob.mx/informacion_fiscal/normatividad/Documents/Compilacion_Anexo25_RMF.pdf |
| <i>Singapore</i> | https://www.treasury.gov/resource-center/tax-policy/treaties/Documents/FATCA-Agreement-Singapore-12-9-2014.pdf | Guidance notes: https://www.iras.gov.sg/irashome/uploadedFiles/IRASHome/Quick_Links/International_Tax/e-Tax%20Guide-Compliance%20Requirements%20of%20SG-US%20IGA%20on%20FATCA.pdf FAQs: https://www.iras.gov.sg/irashome/uploadedFiles/IRASHome/Quick_Links/International_Tax/FAQs%20-%20FATCA%20Filing%20Process_Jul%202017.pdf Tax Authority Website: https://www.iras.gov.sg/ |