SAINT VINCENT AND THE GRENADINES

FORM NO. ES1

Inland Revenue Department

ANNUAL ECONOMIC SUBSTANCE RETURN

For Assessment Period 20

(Form Approved by the Comptroller under section 29 International Tax Co-operation (Economic Substance) Act 2020

It is a serious offence to make a false return

FORM 1

(to be completed by every resident entity)

Note: Supporting documentation must be submitted with this return. Where additional explanations are required or would assist the Comptroller to make an assessment, these can be provided on a separate sheet.

| Rows | Rows 1 to 7: General Information | | | | |
|-------|--|--|--|--|--|
| To be | o be completed by all resident entities | | | | |
| 1. | Name of resident entity (in block letters): | | | | |
| 2. | Address in Saint Vincent and the Grenadines for service of documents: | | | | |
| | | | | | |
| | | | | | |
| | Telephone No: | | | | |
| | Email address: | | | | |
| 3. | Address of registered office (if company or business company) or principal office in Saint Vincent and the Grenadines (if external company): | | | | |
| | | | | | |
| | | | | | |
| | | | | | |
| 4 | - · · · · · · · · · · · · · · · · · · · | | | | |
| 4. | Type of entity: Company Business company | | | | |
| | External company | | | | |
| 5. | Assessment period: From: To: | | | | |
| | <u> </u> | | | | |
| 6. | Was the resident entity an excluded entity during the assessment period: Yes Go to row 8 | | | | |
| | No Go to row 7 | | | | |
| 7. | Did the resident entity (not being an excluded entity) ¹ undertake a relevant activity during the assessment period: | | | | |
| | Yes Go to Declaration and then to Form 2 | | | | |
| | No Go to Declaration | | | | |
| | If a resident entity claiming to be an excluded entity: Go to row 8 | | | | |

 $^{^{\}mathrm{1}}$ Section 2 of the Act defines a resident entity that is not an excluded entity as a "relevant entity"

| Row 8 | B: Excluded Entities |
|-------|---|
| To be | completed by resident entities claiming to be excluded entities |
| 8. | Basis for claim to be excluded entity in assessment period (tick one box only): |
| | Tax resident in country outside Saint Vincent and the Grenadines Complete rows 9 to 16 |
| | Locally controlled entity Go to row 17 |
| Rows | 9 to 17: Tax Residence Outside Saint Vincent and the Grenadines |
| | completed (as applicable) by excluded entities claiming tax residence outside Saint Vincent and the Grenadines, her or not the excluded entity undertook a relevant activity during the assessment period |
| 9. | Country in which the entity was tax resident during assessment period: |
| 10. | Tax identification number (TIN) or equivalent for country of tax residence: |
| 11. | Was the entity subject to corporate income tax on all of its income from relevant activities undertaken during the assessment by virtue of its tax residence in the country specified in row 9: Yes No |
| | If "No", provide a full explanation as to how the entity justifies its claim to be an excluded entity on the basis of tax residence outside Saint Vincent and the Grenadines: |
| | Attach a tax certificate, or equivalent document, issued by the tax authority in the country specified in row 9 concerned or, if not available, such other documents that the entity relies on to demonstrate its tax residency outside Saint Vincent and the Grenadines. Go to row 12 |
| 12. | Does the entity have any holding entities: Yes Go to row 13 |
| | No Go to row 14 |
| 13. | List all holding entities of the resident entity: Holding entity 1: Full legal name of holding entity: Former names (if any): Address of holding entity's principal place of business or principal office: |
| | Address of holding entity's registered office (if applicable): |
| | Legal form of holding entity: Country in which holding entity is constituted: Law by which holding entity is governed: The registration number or similar of the holding entity (if applicable): Country of tax residence of holding entity: TIN or equivalent of holding entity: Is the holding entity an ultimate holding entity: |

| | No |
|------------|---|
| | |
| | Holding entity 2 (if applicable): |
| | Full legal name of holding entity: |
| | Former names (if any): |
| | Address of holding entity's principal place of business or principal office: |
| | Address of holding entity's registered office (if applicable): |
| | Legal form of holding entity: |
| | Country in which holding entity is constituted: |
| | Law by which holding entity is governed: |
| | The registration number or similar of the holding entity (if applicable): |
| | Country of tax residence of holding entity: |
| | TIN or equivalent of holding entity: |
| | Is the holding entity an ultimate holding entity: Yes No |
| | |
| 14 | Go to row 14 |
| .4. | Does the entity have any ultimate beneficial owners who are individuals: |
| 4. | Does the entity have any ultimate beneficial owners who are individuals: Yes Go to row 15 |
| | Does the entity have any ultimate beneficial owners who are individuals: |
| | Does the entity have any ultimate beneficial owners who are individuals: Yes Go to row 15 No Go to row 16 |
| | Does the entity have any ultimate beneficial owners who are individuals: Yes Go to row 15 No Go to row 16 State the number of ultimate beneficial owners of the entity who are individuals: Provide the following information with respect to each ultimate beneficial owner of the entity who is an |
| | Does the entity have any ultimate beneficial owners who are individuals: Yes Go to row 15 No Go to row 16 State the number of ultimate beneficial owners of the entity who are individuals: Provide the following information with respect to each ultimate beneficial owner of the entity who is an individual: |
| | Does the entity have any ultimate beneficial owners who are individuals: Yes Go to row 15 No Go to row 16 State the number of ultimate beneficial owners of the entity who are individuals: Provide the following information with respect to each ultimate beneficial owner of the entity who is an individual: Ultimate beneficial owner (individual) 1: |
| | Does the entity have any ultimate beneficial owners who are individuals: Yes Go to row 15 No Go to row 16 State the number of ultimate beneficial owners of the entity who are individuals: Provide the following information with respect to each ultimate beneficial owner of the entity who is an individual: Ultimate beneficial owner (individual) 1: Full legal name: |
| | Does the entity have any ultimate beneficial owners who are individuals: Yes Go to row 15 No Go to row 16 State the number of ultimate beneficial owners of the entity who are individuals: Provide the following information with respect to each ultimate beneficial owner of the entity who is an individual: Ultimate beneficial owner (individual) 1: Full legal name: Former names (if any): |
| 14. | Does the entity have any ultimate beneficial owners who are individuals: Yes Go to row 15 No Go to row 16 State the number of ultimate beneficial owners of the entity who are individuals: Provide the following information with respect to each ultimate beneficial owner of the entity who is an individual: Ultimate beneficial owner (individual) 1: Full legal name: Former names (if any): Nationality: |
| | Does the entity have any ultimate beneficial owners who are individuals: Yes Go to row 15 No Go to row 16 State the number of ultimate beneficial owners of the entity who are individuals: Provide the following information with respect to each ultimate beneficial owner of the entity who is an individual: Ultimate beneficial owner (individual) 1: Full legal name: Former names (if any): Nationality: Country in which located: |
| | Does the entity have any ultimate beneficial owners who are individuals: Yes Go to row 15 No Go to row 16 State the number of ultimate beneficial owners of the entity who are individuals: Provide the following information with respect to each ultimate beneficial owner of the entity who is an individual: Ultimate beneficial owner (individual) 1: Full legal name: Former names (if any): Nationality: Country in which located: |
| | Does the entity have any ultimate beneficial owners who are individuals: Yes Go to row 15 No Go to row 16 State the number of ultimate beneficial owners of the entity who are individuals: Provide the following information with respect to each ultimate beneficial owner of the entity who is an individual: Ultimate beneficial owner (individual) 1: Full legal name: Former names (if any): Nationality: Country in which located: Usual residential address: |
| | Does the entity have any ultimate beneficial owners who are individuals: Yes Go to row 15 No Go to row 16 State the number of ultimate beneficial owners of the entity who are individuals: Provide the following information with respect to each ultimate beneficial owner of the entity who is an individual: Ultimate beneficial owner (individual) 1: Full legal name: Former names (if any): Nationality: Country in which located: Usual residential address: |

| • | | |
|---|--|---------------------------|
| Ultimate beneficial owner (individual) 2 | : | |
| Full legal name: | | |
| Former names (if any): | | |
| Nationality: | | |
| Country in which located: | | |
| Usual residential address: | | |
| | | |
| Basis for beneficial ownership: | Issued shares | |
| | Voting rights | |
| | Right to appoint/remove director | |
| | Significant influence or control | Ш |
| through another person, provide full o | | |
| owner Go to row 16 | additional ultimate beneficial owner who | s an maividual belletilda |
| Does the entity have any (non-individual) |) ultimate beneficial owners: | |
| | Yes Go to row 17 | |
| | | |
| | No Go to Declarat | ion |
| State the number of ultimate beneficial o | No Go to Declarat | |
| | | o are not individuals: |
| Provide the following information with re | owners of the entity which are persons who | o are not individuals: |
| Provide the following information with reother than an individual: | owners of the entity which are persons who | o are not individuals: |
| Provide the following information with reother than an individual: Ultimate (non-individual) beneficial own | owners of the entity which are persons who | o are not individuals: |
| Provide the following information with reother than an individual: Ultimate (non-individual) beneficial own Type of person and legal form: | owners of the entity which are persons who | o are not individuals: |
| Provide the following information with reother than an individual: Ultimate (non-individual) beneficial own Type of person and legal form: Full legal name: | owners of the entity which are persons who | o are not individuals: |
| Provide the following information with reother than an individual: Ultimate (non-individual) beneficial own Type of person and legal form: Full legal name: Country in which located: Address: | owners of the entity which are persons who | o are not individuals: |
| Provide the following information with reother than an individual: Ultimate (non-individual) beneficial own Type of person and legal form: Full legal name: Country in which located: | owners of the entity which are persons who | o are not individuals: |

| | Country of tax residence of entity: | |
|------|---|---|
| | TIN or equivalent of entity: | |
| | Basis for beneficial ownership: | Issued shares |
| | | Voting rights |
| | | Right to appoint/remove director |
| | | Significant influence or control |
| | If the shares, voting or other rights or through another person, provide full d | the significant influence or control are held or exercised indirectly or etails: |
| | Ultimate (non-individual) beneficial own | er 2: |
| | Type of person and legal form: | |
| | Full legal name: | |
| | Country in which located: | |
| | Address: | |
| | | |
| | Registered office (if applicable): | |
| | | |
| | The registration number or similar of t | he entity (if applicable): |
| | Country of tax residence of entity: | |
| | TIN or equivalent of entity: | |
| | Basis for beneficial ownership: | Issued shares |
| | | Voting rights |
| | | Right to appoint/remove director |
| | | Significant influence or control |
| | If the shares, voting or other rights or through another person, provide full d | the significant influence or control are held or exercised indirectly or etails: |
| | | |
| | | neficial owners who are not individuals, continue on separate sheet additional ultimate beneficial owner who is an individual |
| Rows | : 18 to 30: Locally Controlled Entities | |
| | | entity claiming to be a locally controlled entity |
| 18. | Did the excluded entity undertake a relev | ant activity during the assessment period: Yes Complete rows 19 to 30 (as applicable) No Go to Declaration |
| 19. | Tax identification number of the entity in | Saint Vincent and the Grenadines: |
| 20. | · | |
| | Description of the activities and business | undertaken by the entity. |

| 21. | I/we confirm thatentity): | | | | | | (full na | ime of |
|-----|--|-------------------------------|------------|-----------|------------------|-----------|----------------------|----------|
| | 1. Conducts its activities exclusively in Sa | aint Vincent and | I the Gr | enadine | 5 | | | |
| | 2. Is not part of a multinational enterpri | | | | | | | |
| 22. | Individual shareholding owners/vote co | ntrollers | | | | | | |
| | Does the excluded entity have any share | | and/or | vote cot | rollers w | ho are | individuals | s: |
| | | Yes | | | | | n request | |
| | | No | | Go to r | | | | |
| | Provide details of each individual shareh | olding owner or | vote co | ontroller | of the ex | cluded | entity: | |
| | Individual shareholding owner and/or v | ote controller 1 | . : | | | | | |
| | Full legal name: | | | | | | | |
| | Former names (if any): | | | | | | | |
| | Nationality: | | | | | | | |
| | Is the individual shareholding owner/ | vote controller | a local p | erson (a | s defined | d in sec | tion 6 of th | ne Act): |
| | | Yes | | | | | | |
| | | No | | | | | | |
| | If a local person, basis for right to resi | de in Saint Vinc | ent and | the Gre | nadines: | | | |
| | Usual residential address: | | | | | | | |
| | The individual is: | Shareholding Vote controll | | | Direct Direct | | Indirect Indirect | |
| | Percentage of issued shares owned: | | | | | | | |
| | Percentage of voting rights held: | | | | | | | |
| | If the individual owns isssued shares, below or on a separate sheet | or exercises vot | ing righ | ts indire | ctly, full (| details | must be pr | rovided |
| | Individual shareholding owner and/or v | ote controller 2 | !: | | | | | |
| | Full legal name: | | | | | | | |
| | Former names (if any): | | | | | | | |
| | Nationality: | | | | | | | |
| | Is the shareholding owner/vote contr | oller a local pers Yes | son (as | defined | n sectior | n 6 of th | ne Act): | |
| | | No | | | | | | |
| | Basis for right to reside in Saint Vince. Usual residential address: | nt and the Gren | adines: | | | | | |
| | The local person is: | Shareholding Vote controll | | | Direct Direct | | Indirect Indirect | |
| | | | | | | | | |

| | Percentage of issued shares owned | : |
|-----|--|--|
| | Percentage of voting rights held: | |
| | If the local person owns isssued sha below or on a separate sheet | ares, or exercises voting rights indirectly, full details must be provided |
| | 1 | ding owners/vote controllers who are individual local persons, continue information as above for each additional shareholding owner/vote |
| | Go to row 23 | |
| 23. | Government shareholding owner/vot | e controller |
| | Is the Government a shareholding own | ner and/or a vote controller of the excluded entity: |
| | | Yes Provide the information requested below |
| | | No Go to row 24 |
| | Responsible Ministry or Departmen | nt: |
| | The Government is: | Shareholding owner Direct Indirect |
| | | Vote controller Direct Indirect |
| | Percentage of issued shares owned | : |
| | Percentage of voting rights held: | |
| | If the Government owns isssued sha | ares and/or exercises voting rights indirectly, full details must be |
| | provided below or on a separate sh | eet |
| | Co to row 24 | |
| | Go to row 24 | |
| 24. | Local authority shareholding owners/ | vote controllers |
| | Are any local authorities shareholding | owners and/or vote controllers of the excluded entity: |
| | | Yes Provide the information requested below |
| | | No Go to row 25 |
| | State for each local authority that is | s a shareholding owner and/or vote controller: |
| | Name of local authority: | |
| | Responsible Department: | |
| | Contact telephone number: | |
| | The local authority is: | Shareholding owner Direct Indirect |
| | | Vote controller Direct Indirect |
| | Percentage of issued shares owned | ; |
| | Percentage of voting rights held: | |
| | If the local authority owns isssued s below or on a separate sheet | shares, or exercises voting rights, indirectly, full details must be provided |
| | Provide details of any other local au sheet | uthorities who are shareholding owners/vote controllers on a separate |
| | | |
| | Go to row 25 | |
| 25. | Go to row 25 Publicly owned entity shareholding ov | wners/vote controllers |
| 25. | Publicly owned entity shareholding ov | wners/vote controllers nolding owners and/or vote controllers of the excluded entity: |

| | | No | | | | | | |
|---|---|---|---|---------|---|-------------|-----------|---------|
| State for each publicly owned entity that is a shareholding owner and/or vote controller: | | | | | | | | |
| | Name of publicly owned entity: | | | | | | | |
| | Act under which entity constituted: | | | | | | | |
| | The publicly owned entity is: | Shareholding o | wner | П | Direct [| Indi | rect | |
| | , , | Vote controller | | | Direct [| ⊐ □ Indi | | |
| | | | | ш | | | | |
| | Percentage of issued shares owned: | | | | | | | |
| | Percentage of voting rights held: | | | | | | | |
| | If the publicly owned entity owns issues be provided below or on a separate s | | r exercis | ses vo | ting rights, | indirectly, | full det | ails mu |
| | Provide details of any other publicly ow separate sheet Go to row 26 | ned entities who a | re share | eholdii | ng owners/ | vote contr | ollers c | on a |
| | Other entity or person shareholding ov | vners/vote contro | llers (ca | nnot l | be local pe | rsons) | | |
| | Are any entities or persons shareholding | | | | - | | ty: | |
| | · | Yes | | | vide the in | | | ited be |
| | | No [| _ | | to row 27 | | • | |
| | | _ | | | | | | |
| | State for each other entity/person that Full legal name: Former names (if any): | is a shareholding o | wner ar | nd/or v | vote contro | oller: | | |
| | | te controller: | | | | | l office) | : |
| | Full legal name: Former names (if any): Legal form of shareholding entity/vo | te controller: controller (eg. prii | ncipal pl | lace of | f business c | or principa | l office) | : |
| | Full legal name: Former names (if any): Legal form of shareholding entity/vo Address of shareholding owner/vote Address of shareholding owner/vote Country in which shareholding owner | te controller: controller (eg. printer) controller's register | ncipal pl ered off | lace of | f business c | or principa | l office) | : |
| | Full legal name: Former names (if any): Legal form of shareholding entity/vo Address of shareholding owner/vote Address of shareholding owner/vote Country in which shareholding owner/vote Law by which shareholding owner/vote | te controller: controller (eg. printer) controller's register r/vote controller is go | ncipal pl ered off s constit verned: | lace of | f business o | or principa | l office) | |
| | Full legal name: Former names (if any): Legal form of shareholding entity/vo Address of shareholding owner/vote Address of shareholding owner/vote Country in which shareholding owner | te controller: controller (eg. printed) controller's register r/vote controller is go | ncipal pl ered off s constit verned: | lace of | f business o | or principa | l office) | |
| | Full legal name: Former names (if any): Legal form of shareholding entity/vo Address of shareholding owner/vote Address of shareholding owner/vote Country in which shareholding owner/vote Law by which shareholding owner/vote The registration number or similar of | te controller: controller (eg. print) controller's register r/vote controller is poster controller is go f the holding entity | ncipal pl ered off constit verned: | lace of | f business of applicable) | or principa | | : |
| | Full legal name: Former names (if any): Legal form of shareholding entity/vo Address of shareholding owner/vote Address of shareholding owner/vote Country in which shareholding owner/vote Law by which shareholding owner/vote | te controller: controller (eg. printer) controller's register r/vote controller is pote controller is go f the holding entity Shareholding or | ncipal pl ered off constit verned: v (if appl | lace of | f business of applicable) | or principa | rect | |
| | Full legal name: Former names (if any): Legal form of shareholding entity/vo Address of shareholding owner/vote Address of shareholding owner/vote Country in which shareholding owner/vote Law by which shareholding owner/vote The registration number or similar of | te controller: controller (eg. print) controller's register r/vote controller is poster controller is go f the holding entity | ncipal pl ered off constit verned: v (if appl | lace of | f business of applicable) | or principa | rect | |
| | Full legal name: Former names (if any): Legal form of shareholding entity/vo Address of shareholding owner/vote Address of shareholding owner/vote Country in which shareholding owner/vote Law by which shareholding owner/vote The registration number or similar of The entity or other person is: | te controller: controller (eg. printer) controller's register r/vote controller is pote controller is go f the holding entity Shareholding or | ncipal pl ered off constit verned: v (if appl | lace of | f business of applicable) | or principa | rect | |
| | Full legal name: Former names (if any): Legal form of shareholding entity/vo Address of shareholding owner/vote Address of shareholding owner/vote Country in which shareholding owner/vote Law by which shareholding owner/vote The registration number or similar of The entity or other person is: Percentage of issued shares owned: | te controller: controller (eg. printer) controller's register r/vote controller is pote controller is go f the holding entity Shareholding or | ncipal pl ered off constit verned: v (if appl | lace of | f business of applicable) | or principa | rect | |
| | Full legal name: Former names (if any): Legal form of shareholding entity/vo Address of shareholding owner/vote Address of shareholding owner/vote Country in which shareholding owner/vote Law by which shareholding owner/vote The registration number or similar of The entity or other person is: | te controller: controller (eg. printed) controller's register r/vote controller is go f the holding entity Shareholding or Vote controller | ered off constituerned: (if appl | lace of | f business of applicable) Direct Direct | or principa | rect | |

| | Provide details of any other entities or persons who are share sheet | eholding owners/vote controllers on a separate |
|-----|--|---|
| | Go to row 27 | |
| 27. | 7. Qualifying share ownership/vote holders | |
| | Total percentage of issued shares of resident entity owned di | rectly or indirectly by local persons: |
| | Total percentage voting rights controlled directly or indirectly | |
| | Go to row 28 | |
| 28. | B. Directors | |
| | Provide list of directors who are local persons (as defined in s | section 6 of the Act): |
| | <u>Full Name</u> | <u>Director type (eg individual/corporate)</u> |
| | 1. | · · · · · · · · · · · · · · · · · · · |
| | 2. | |
| | 3. | |
| | 4. | |
| | 5. | |
| | 6. | |
| | 7. | |
| | 8. | |
| | | |
| | Provide list of directors who are not local persons: | |
| | <u>Full Name</u> | Director type (eg individual/corporate) |
| | 1. | |
| | 2. | |
| | 3. | |
| | 4. | |
| | 5. | |
| | 6. | |
| | 7. | |
| | 8. | |
| | | |
| | Go to row 29 | |
| 29. | 9. Individual directors | |
| | Provide the following information with respect to each direct | or of the excluded entity who is an individual: |
| | Director (individual) 1: | |
| | Full legal name: | |
| | Former names (if any): | |
| | Nationality: | |
| | Country in which located: | |
| | Usual residential address: | |
| | Director (individual) 2: | |
| | Full legal name: | |
| | Former names (if any): | |
| | Nationality: | |
| | Country in which located: | |
| | Usual residential address: | |

| Director (individual) 3: | |
|--|---|
| Full legal name: | |
| Former names (if any): | |
| Nationality: | |
| Country in which located: | |
| Usual residential address: | |
| If more than 3 directors who are individuals, provide details on a separate sheet. | |
| Go to row 30 | |
| Corporate directors | _ |
| Director (corporate) 1: | |
| Full legal name of corporate director: | |
| Former names (if any): | |
| Address of director's principal place of business or principal office: | |
| | |
| Address of director's registered office (if applicable): | |
| | |
| Legal form of director: | |
| Country in which director is constituted: | |
| Law by which director is governed: | |
| The registration number or similar of the director (if applicable): | |
| Director (corporate) 2: | |
| Full legal name of corporate director: | |
| Former names (if any): | |
| Address of director's principal place of business or principal office: | |
| | |
| Address of director's registered office (if applicable): | |
| Legal form of director: | |
| Country in which director is constituted: | |
| Law by which director is governed: | |
| The registration number or similar of the director (if applicable): | |
| Director (corporate) 3: | |
| Full legal name of corporate director: | |
| Former names (if any): | |
| Address of director's principal place of business or principal office: | |

| Address of director's registered office (if applicable): |
|--|
| Address of director's registered office (if applicable). |
| |
| Legal form of director: |
| Country in which director is constituted: |
| Law by which director is governed: |
| The registration number or similar of the director (if applicable): |
| If more than 3 directors who are companies or other entities, provide details on a separate sheet. |
| Go to Declaration |

| Declaration: | |
|--|---|
| accurate and I understand that under section 2 | declare that all information in this Return is 7 of the International Tax Co-operation (Economic Substance) Act 2020, it also or misleading information to the Controller, including by the omission am authorised to sign this Return. |
| Signed under my hand this | day of |
| Signature | Director or other Officer |

Note:

Form 2 must be completed by every relevant entity (i.e. a resident entity that is not an excluded entity) that undertook a relevant activity during the assessment period.