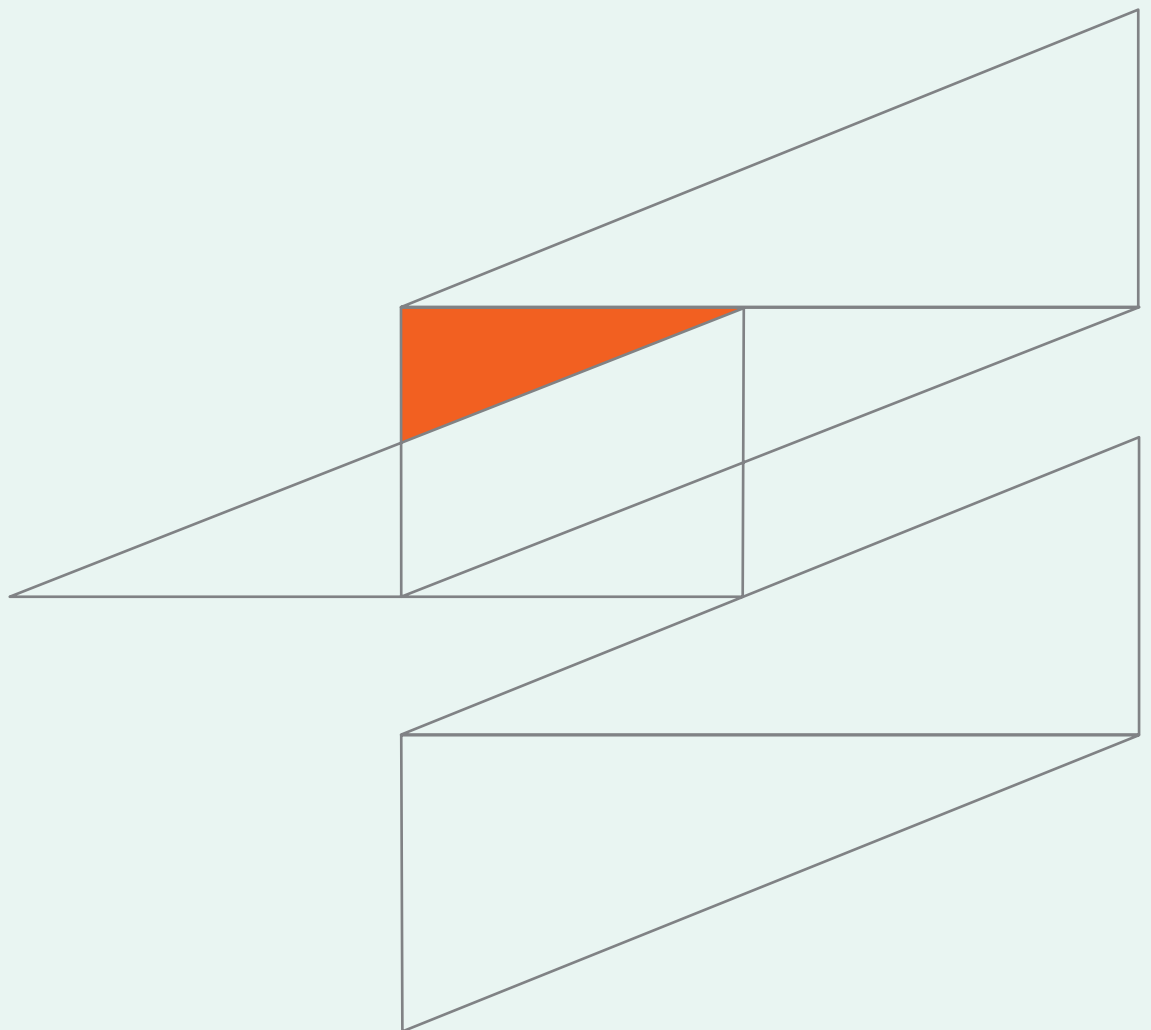


The Tax and Regulatory Universe 2020

AN OVERVIEW OF CURRENT AND
FUTURE TAXATION AND REGULATION

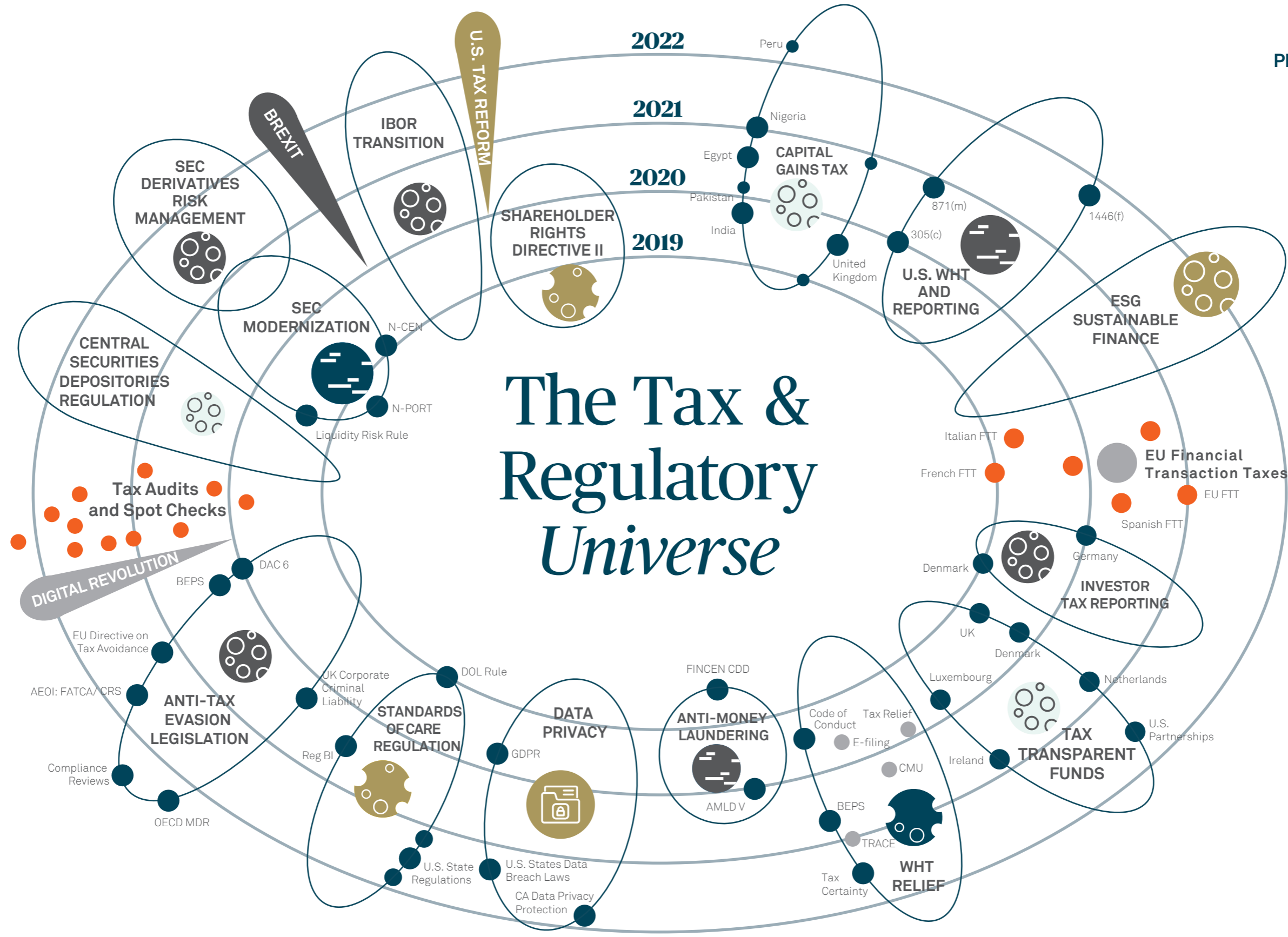




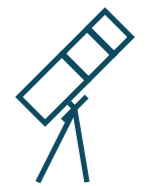
STRATEGY & OVERSIGHT



PEOPLE/EXPERIENCE



TECHNOLOGY



RISK MANAGEMENT

Tax and Regulatory Summaries

CAPITAL GAINS TAX (CGT)



Capital gains tax (CGT) is a tax on the increase in value of assets during the time they have been owned, and is typically due when the asset is disposed.

The process of calculating and levying CGT on foreign investors differs widely between jurisdictions. While historically CGT was not a significant concern for portfolio investments, the last decade has seen a significant increase in exposure to CGT for foreign investors (particularly emerging and frontier markets).

The method for calculating and/or collecting CGT differs from country to country, and can be extremely complex and/or uncertain in some markets. Due to these uncertainties, and the potential risks created by CGT, this has been a key area of focus for auditors and investors.

U.S. WITHHOLDING TAX AND REPORTING (U.S. WHT)



U.S. withholding tax involves the U.S. reporting of income and withholding (if applicable) to the U.S. and non-U.S. assets. The Internal Revenue Service (IRS) is seeking to expand withholding into derivative transactions.

IRC §871(m) impacts non-U.S. entities by imposing WHT on certain dividend equivalent payments generated by notional principal contracts, derivatives and other 'equity-linked investments' where the payments reference dividends on U.S. equity. IRC §305(c) requires U.S. withholding agents to withhold on deemed distributions associated with convertible debt instruments held by U.S. and non-U.S. entities, where an adjustment is made to the instrument when an underlying U.S. dividend is declared. IRC §1446(f) requires withholding on certain dispositions of partnerships, where the seller is non-U.S. and the partnership holds assets that generate Effectively Connected Income (ECI).

U.S. TAX REFORM

U.S. TAX REFORM

Following up on campaign promises, the current administration made tax reform a priority, and in November 2017 passed the Tax Cuts and Jobs Act of 2017 ('TCJA'). The TCJA reduced individual and corporate tax rates, and eliminated or limited many existing deductions. The

TCJA also moves the U.S. to a territorial tax system, and imposed a tax on existing repatriated earnings. While the bill passed in November 2017, additional guidance and fixes are still expected this year.

ESG SUSTAINABLE FINANCE



The ESG (Environmental, Social and Governance) revolution has begun, and its transformative effects have started to shape the way our clients approach investment decision-making and traditional financial models.

EU policy is one of the main driving forces compelling change in the financial services industry, placing enhanced transparency on what is to be considered sustainable at the core of its regulatory focus.

Convergence of scientific evidence, standards, and methodologies on what activities are 'environmentally sustainable' constituted in itself a journey for EU co-legislators and Member States; a journey embarked on from the moment the European Commission released its Action Plan on Sustainable Finance in 2018. Fast-forward months of technical analysis, negotiation and input, we have now a near-final framework for an EU classification system for the identification of activities contributing to environmental objectives: the draft EU Taxonomy Regulation, expected to become law in 2020.

In addition, EU co-legislators created a new set of disclosure requirements for financial market participants and financial advisers on the integration of sustainability risks, the consideration of adverse sustainability impacts, and the provision of sustainability-related information with respect to financial products. While these disclosure requirements will not apply until March 10, 2021, implementation-planning kicks off now for in scope firms.

BNY Mellon welcomes these initiatives targeted at channeling the capital needed to finance the transition to a more sustainable economy, supporting investors making informed investment decisions.

BNY Mellon is well positioned to help our clients command the vast amount of data they require to align their investment portfolios to their needs and priorities, leveraging the wealth of information we process and store on their behalf.

EU FINANCIAL TRANSACTION TAXES (FTTs)



Following the 2008 financial crisis, the European Commission determined that an EU FTT would lead the financial sector to 'contribute more fairly to the costs of the crisis' and would help address the fiscal imbalance in Europe.

Broadly, the proposed EU FTT Directive introduces a tax on transactions involving a wide variety of financial instruments.

The Member States of the Enhanced Cooperation Procedure (Austria, Belgium, France, Germany, Greece, Italy, Portugal, Slovenia, Slovakia and Spain) are in continued discussions to refine the scope, implementation date and operational framework of the proposal. In June 2019, it was reported that this group agreed to broaden the terms of the FTT with a proposed implementation date of 2021.

France and Italy already have local FTTs and Spain, Portugal and Hungary are expected to enact their respective FTTs should the EU FTT not happen. FTTs are not new to markets globally and have been passed in various forms and countries.

INVESTOR TAX REPORTING



Within Europe, effective cross-border distribution of funds may require investor tax reporting in certain jurisdictions. With the number of jurisdictions within Europe imposing their own set of rules and restrictions on investments in UCITS and other vehicles the provision of investor tax reporting has become more in demand than ever. Austria, Belgium, Germany, Italy, Norway, Switzerland, and the United Kingdom, are countries where investor tax reporting is required.

In addition to European countries, the U.S. has K-1 and Passive Foreign Investment Company (PFIC) reporting regimes, and South Korea introduced its own investor tax reporting regime.

TAX TRANSPARENT FUNDS (TTFs)



Tax transparent funds (TTFs) combine the benefits of pooling with tax neutrality for the underlying investors. Pooling is the term used to describe the aggregation of various investors' assets into a single fund vehicle in order to benefit from a diversified portfolio, centralized administration, an enhanced governance structure as well as increased cost savings from economies of scale.

TTFs allow investors to access the same double taxation treaty benefits which would have resulted from investing directly in the fund's underlying assets, as well as benefit from the advantages listed above. A TTF may appeal to asset managers, pension funds, life companies, charities and sovereign wealth funds.

AUTOMATIC EXCHANGE OF INFORMATION (AEOI)



With the introduction of the U.S. Foreign Account Tax Compliance Act (FATCA) in 2010, the global tax community has transformed the way in which it exchanges information.

Today, in addition to U.S. FATCA, More than 100 countries have committed to information exchange of financial accounts by locally implementing the Organisation for Economic Co-operation and Development's (OECD) Common Reporting Standard (CRS).

Both FATCA and CRS intend to bring about greater tax transparency. Both regimes require financial institutions to identify and report on certain account holders who have U.S. citizenship and/or tax residency outside of the financial institution's jurisdiction of operation.

Governments will then exchange this information globally, giving tax authorities greater visibility into the location of their taxpayers' financial assets.

WHT RELIEF



When a government identifies an income event, the withholding tax is levied; in most cases the income event and associated taxation are domestic in nature. However, international withholding tax becomes relevant when the income event is paid to a ‘beneficiary’ who is not tax resident in the country where the income arises. For example, a UK investor investing in U.S. securities is subject to U.S. withholding tax on distributions made from these securities.

Double taxation treaties (DTT) are important to avoid or minimize double taxation and limit tax evasion. BNY Mellon offers custody services in more than 100 countries, and each of these countries implements the collection and corresponding relief from withholding tax differently. Understanding the application of withholding tax in each jurisdiction of investment is a key concern for our clients, and BNY Mellon strives to facilitate the collection and relief of withholding tax. Central to BNY Mellon’s service is monitoring and understanding the changes to governments’ policies and procedures for the collection and relief of withholding tax and the corresponding impact to our clients.

The introduction by the Organisation for Economic Co-operation and Development (OECD) of the Base Erosion and Profit Shifting (BEPS) project, which consisted of 15 actions to combat international tax avoidance, is rapidly transforming withholding tax procedures globally. Action 15 introduced a new model Multilateral Tax Convention, or ‘Instrument’ (MLI). The MLI, which entered into force on July 1, 2018, is designed as an efficient method to incorporate the majority of BEPS measures quickly into existing bilateral tax treaties, with the remainder to be implemented into a source country’s domestic law. As a result of BEPS, industry must be increasingly vigilant to the changes occurring to reduce the uncertainty that such rapid change creates, and to ensure a quick response to allow clients to continue to obtain relief from withholding tax to avoid double taxation.

ANTI-MONEY LAUNDERING



Anti-money laundering refers to a set of laws, regulations, and procedures intended to prevent criminals from disguising illegally obtained funds as legitimate income. Though anti-money laundering laws cover a relatively limited range of transactions and criminal behaviors, their implications are far-reaching.

Anti-money laundering laws and regulations target criminal activities including market manipulation, trade in illegal goods, corruption of public funds and tax evasion, as well as the methods that are used to conceal these crimes and the money derived from them.

The Fifth Anti-Money Laundering Directive (5AMLD)

5AMLD makes enhancements to the Fourth Anti-Money Laundering Directive (4AMLD), which necessitated a change in how regulated entities approach money laundering preventative measures. The main changes focus on EU Member State authorities receiving additional powers for direct access to information and increased transparency around beneficial ownership. 5AMLD required Member States to enact its requirements by January 2020.

Member States are at different stages of implementing central beneficial ownership registers, with some already having these registers in place and others having not yet implemented them. As 5AMLD is enacted into legislation across the EU, BNY Mellon will have an obligation to confirm the beneficial ownership registration information held in the central beneficial ownership register, a country specific central register that lists the ultimate beneficial ownership (UBO) of companies registered in that jurisdiction. In addition, in certain situations, where BNY Mellon identifies discrepancies between the beneficial ownership information available in the register and the beneficial ownership BNY Mellon obtains as part of Know Your Customer (KYC) review, we may have an obligation to report this to the authorities maintaining the UBO register. Similar arrangements will apply to trusts whereby BNY Mellon will have an obligation to confirm the beneficial ownership information held in the jurisdiction central trust beneficial ownership register and discrepancies may need to be reported.

STANDARDS OF CARE LEGISLATION



On June 5, 2019, the Securities and Exchange Commission (SEC) adopted a new rule (Regulation BI), a new form (Form CRS) and interpretive guidance that together is intended to “enhance the quality and transparency of retail investors’ relationships with investment advisers and broker-dealers, bringing the legal requirements and mandated disclosures in line with reasonable investor expectations, while preserving access (in terms of choice and cost) to a variety of investment services and products.” By June 30, 2020, registered broker-dealers must begin complying with Regulation BI and broker-dealers and investment advisers registered with the Commission will be required to prepare, deliver to retail investors, and file a Form CRS relationship summary.

This package of regulation has been criticized for not going far enough to protect investors. Seven states and the District of Columbia are challenging the regulation in federal court, because it fails to protect investors and contradicts Congress’ express intent in implementing a 2010 Dodd-Frank Directive.

Meanwhile, a number of states are considering the adoption of legislation that would impose more aggressive standard of care obligations on broker-dealers and/or financial advisors.

DATA PRIVACY



As a leading financial institution, BNY Mellon monitors privacy developments facing our industry and adjusts its privacy strategy and controls in response. Clients and employee trust are at the heart of our privacy strategy. Meeting the requirements of the EU General Data Protection Regulation (GDPR) creates value for clients and employees by:

- Providing a better understanding of why and how we process personal information, as well as comfort around our privacy controls
- Offering a consistent privacy experience across products and services (“Privacy by Design”)
- Enabling business and technology innovation in a compliant manner

BNY Mellon employs multiple layers of controls (people, process, technology) to uphold individuals’ privacy rights and protect their information. We continuously evaluate our enterprise for opportunities to enhance controls and mitigate privacy risks, investigate concerns and monitor systems and processes for privacy-related incidents.

Our privacy management framework is aligned with international standards.

There are many laws and regulations governing the collection, use, storage, deletion or any other ‘processing’ of personal information across the globe, with which BNY Mellon, as a financial institution with a multi-national presence, must comply. With the rapid emergence of new technologies and an increased spotlight on privacy, we are observing the ongoing development of more robust privacy laws and regulations to keep pace with evolving technology, digital and business models.

The new California Consumer Privacy Act of 2018, has been compared to the European Union’s General Data Protection Regulation (GDPR), and comes into effect in 2020. While the California Consumer Privacy Act of 2018 does not have the exact same provisions as GDPR, it is close in many respects. That includes giving consumers the right to know how their data is used, why it is being collected, and also to bar companies from selling the data. In addition, legislation has been enacted by all U.S. states that requires private entities or government agencies to notify individuals who have been impacted by security breaches that may compromise their personally identifiable information. Therefore, entities that conduct business in any state must be familiar with not only federal regulations, but also individual state laws that apply to any agency or entity that collects, stores, or processes data pertaining to residents in that state. While the laws in many states share some core similarities, state legislators have worked to pass laws that best protect the interests of consumers in their respective states.

ANTI-TAX EVASION LEGISLATION



Governments continue to fight Tax Evasion through the introduction of new and stronger measures.

Automatic Exchange of Information (AEOI) has transformed the way the global tax community exchanges information. The introduction of the U.S. Foreign Account Tax Compliance Act (FATCA) in 2010 accelerated that transformation and today, in addition to U.S. FATCA, over 100 countries have committed to information exchange of financial accounts by locally implementing the Organisation for Economic Co-operation and Development’s (OECD) Common Reporting Standard (CRS). The FATCA and CRS regulations both aim to bring about greater tax transparency. These regulations require financial institutions to identify and report on certain Account Holders who have U.S. citizenship and/or tax

residency outside of the financial institutions jurisdiction of operation. Governments will then exchange this information globally, giving tax authorities greater visibility into the location of their taxpayers' financial assets.

The OECD introduced Mandatory Disclosure Rules to address CRS avoidance arrangements and opaque offshore structures, to ensure the efficacy of the CRS regime. The European Union introduced even broader rules as part of a reform package to address CRS avoidance arrangements, as well as, cross-border tax avoidance schemes. DAC 6, a new EU mandatory disclosure regime, requires 'intermediaries,' those who design, market, organize, manage, aid, assist, or advise on tax arrangements to disclose the arrangement with characteristics that are prevalent in arrangements to avoid tax. Any transaction conducted post June 25, 2018 is in-scope with the first reporting in August 2020. Reporting is ad-hoc and must be completed 30 days within identification of the transaction. Although jurisdictions were required to incorporate the Directive into their local laws by December 31, 2019, many have missed this deadline and actions in this respect are continuing throughout 2020.

The UK in the Criminal Finances Act 2017 introduced two new strict liability corporate criminal offenses for a corporation's failure to prevent the facilitation of tax evasion. This has resulted in firms worldwide reviewing their existing financial crime control framework to ensure appropriate controls are in place. While UK legislation, the rules have a very broad territorial reach capturing both the evasion of UK and non-UK taxes.

DIGITAL REVOLUTION

DIGITAL REVOLUTION

The impacts of the fourth industrial revolution are being felt in the Tax and Regulatory arena, and BNY Mellon has put Digital Transformation at the core of our strategy.

Digital approaches enable us to become even more relevant to our clients – removing unnecessary complexity and processes to become more nimble and able to rethink how we help our clients deliver and maximize value.

Our approach embeds the client experience into everything we do, so that we are easy to do business with. FinTechs and large technology firms present opportunities for us to quickly bring solutions to our clients, and we are very open to engaging on partnership opportunities where they make sense to our client proposition. We are embracing cutting-edge technology, such as machine learning and artificial intelligence to simplify processes and deliver additional insights to clients. And lastly we see data as a foundational service that drives data-driven decision making, business growth and innovation.

CENTRAL SECURITIES DEPOSITARIES REGULATION (CSDR)



On September 13, 2018 the last remaining piece of CSDR, a Delegated Regulation setting out Regulatory Technical Standards (RTS) on Settlement Discipline, was published in the Official Journal of the EU. The RTS were due to enter into force on September 13, 2020, however the European Securities and Markets Authority (ESMA) recently proposed to delay this until February 1, 2021.

All parties in the settlement chain involved in transactions in European markets will be impacted by the settlement discipline regime, including where trading counterparties are located outside of the European Economic Area (EEA). The regulatory obligations will affect both the receiving and delivering parties in a failing transaction.

The Delegated Regulation introduces two main objectives to be implemented through three sets of measures:

1. A set of measures to prevent settlement fails by improving matching and settlement rates
2. Two sets of discipline measures to address settlement fails: cash penalties and mandatory buy-ins

Information on each, including client impacts and BNY Mellon products and services, can be found here: <https://www.bnymellon.com/emea/en/our-thinking/central-securities-depositaries-regulation.jsp>

SEC DERIVATIVES RISK MANAGEMENT



On November 25, 2019, the SEC re-proposed rule 18f-4, a new exemptive rule designed to provide an updated and more comprehensive approach to the regulation of funds' use of derivatives and certain other transaction types. If adopted as proposed, the rule would apply to mutual funds (other than money market funds), exchange traded funds ("ETFs"), registered closed-end funds, and companies that have elected to be treated as business development companies ("BDCs") under the Investment Company Act (collectively, "funds"). It would permit these funds to enter into derivatives transactions and certain other transactions, provided that the funds comply with the conditions of the rule.

In addition, the SEC Commission proposed new reporting requirements and amendments to Form NPORT, Form N-LIQUID (which they propose to be re-titled as "Form N-RN"), and Form N-CEN, which are designed to enhance the SEC Commission's ability to effectively oversee funds' use of and compliance with the proposed rules, and for the SEC Commission and the public to have greater insight into the impact that funds' use of derivatives would have on their portfolios.

The SEC Commission also proposed an amendment to rule 6c-11 under the Investment Company Act to allow certain leveraged/inverse ETFs that satisfy the rule's conditions to operate without the expense and delay of obtaining an exemptive order.

TAX AUDITS AND SPOT CHECKS



In recent years, tax authorities worldwide have and continue to strengthen their enforcement provisions, including increasing focus on transparency, disclosure and imposing more onerous requirements in connection with administering their tax systems.

As tax authorities focus on tackling perceived abuse of tax rules, the result has been an increase in the number of both formal tax audits and spot checks on relief arrangements by many jurisdictions. In many instances spot checks focus on confirming the beneficial ownership of the recipient of the income. Tax audits can result in significant tax penalties and interest, reputational damage as well as time costs associated in responding to them. Appropriate controls, procedures and training with the implementation of an effective tax risk management programme reduce the risk of an audit, and the risk of adverse audit findings.

BREXIT

BREXIT

The UK left the European Union on January 31, 2020 with a withdrawal deal agreed with the EU.

Following this departure there will be a transitional period through to December 31, 2020. During this transitional period most EU law will continue to apply to the UK and the UK will continue to participate in the EU Customs Union and the single market. However, during this period, the UK and EU will negotiate an agreement in respect of future relations between each other.

A number of tax implications are likely to arise out of the negotiations between the UK and the EU related to both cross-border relationships between the UK and the EU and UK domestic tax policy.

IBOR TRANSITION



IBORs are unsecured interest rates published for periods ranging from overnight to 12 months. These rates are used for a vast number of financial instruments and products, including products that you may have entered into or may be considering entering into with BNY Mellon.

One of the most widely used IBORs is LIBOR, which is quoted in GBP, USD, EUR, CHF and JPY. These rates are derived from quotes submitted by a group of panel banks that represent each panel bank's cost of obtaining a loan from another member bank in the London interbank market for each of the published tenors.

Amid the financial crisis of 2008, The Wall Street Journal began reporting on a long-running scheme where employees at certain banks were attempting to manipulate the LIBOR, by coordinating their submission of the interest rate quotations that underpin the rate.

Multiple investigations by national regulators and central banks were launched, resulting in billions of dollars in fines, and dozens of lawsuits and settlements. As a result, panel banks became reluctant to continue making LIBOR submissions, prompting the Financial Conduct Authority (FCA) to examine alternative rates that banks could utilize in lieu of LIBOR.

Given the structural weaknesses of LIBOR identified during these investigations, various regulatory authorities have announced support for a reduced reliance on IBORs in favor of alternative reference rates based on actual underlying transaction rates. In particular, LIBOR is expected to be phased out as early as the end of 2021.

Regulators around the globe have initiated forums for market participants to identify alternative reference rates.

These forums were tasked with three primary objectives:

- Identify a rate that was more firmly based on transactions from a robust underlying market and aligned with the International Organization of Securities Commissions (IOSCO) principles
- Develop a plan to facilitate the acceptance and use of selected alternative rates by market participants
- Consider best practices in contract design that would ensure resiliency in the event of possible cessation or material alteration to the selected alternative rate or any subsequent reference rate

SHAREHOLDER RIGHTS DIRECTIVE (SRD II)



The SRD II regulation amends SRD I, which came into effect in 2007 with the objective of improving corporate governance in companies whose securities are traded on the EU's regulated markets. As an amending Directive, it will require transposition into each Member State's national law and enters into force on September 3, 2020. SRD II establishes requirements in relation to the exercise of certain shareholder rights attached to voting shares in general meetings of companies. It also establishes specific requirements to encourage long-term shareholder engagement.

SEC MODERNIZATION



The SEC adopted new rules and amended existing rules intended to enhance transparency and modernize the reporting of information by registered investment companies ("funds") on October 13, 2016. The reporting rules require each management investment company (except for money market funds and small business investment companies) and each ETF structured as a unit investment trust to provide additional and more frequent reports of portfolio holdings and other data monthly on new Form N-PORT. The reporting rules also require most funds to file census information annually on new Form N-CEN. That same day, the SEC unanimously adopted a liquidity risk management program rule and new disclosure requirements for mutual funds and open-end exchange-traded funds ("ETFs"). The SEC's adoption of these liquidity requirements comprises new rules, rule amendments, form amendments, and new forms that collectively require funds to establish liquidity risk management programs under new Rule 22e-4 (the "liquidity rule"), and require funds to provide additional disclosures about redemptions, swing pricing (if applicable), and liquidity on Form N-1A, Form N-PORT, Form N-CEN, and Form N-LIQUID.

BNY MELLON GLOBAL TAX AND REGULATORY SERVICES

BNY Mellon's Global Tax and Regulatory Services team provides support to navigate the global tax and regulatory environment throughout the investment lifecycle. Our team of professionals monitor and research tax and regulatory developments impacting BNY Mellon Asset Servicing clients, working proactively to support them through the development and enhancement of tax and regulatory products and services. Our engagement with regulators and tax authorities around the world, and our active participation in industry associations, gives us early insight into developing legislation and enables us to directly advocate for clients' best interests. We share these insights with clients through frequent thought leadership papers, tax and regulatory forums, communications and events.

LEARN MORE

If you would like to receive further information, please contact your Relationship Manager or a member of the Global Tax and Regulatory Services team.

BNY MELLON GLOBAL TAX AND REGULATORY SERVICES CONTACTS

Mariano Giralt
Head of Global Tax and Regulatory Services
Tel: +44 207 163 6463
E: mariano.giralt@bnymellon.com

Jan Becher
Head of German Tax Services
Tel: +49 69 12014 1435
E: jan.becher@bnymellon.com

Conor Begley
Head of Ireland Tax Services
Tel: +353 1 900 8143
E: conor.begley@bnymellon.com

Charles Hawkins
Vice President, Tax and Regulatory Services
Tel: +1 302-791-1322
E: charles.hawkins@bnymellon.com

Jas Hayre
Global Head of Tax Risk and Financial Markets
Tel: +44 207 163 7488
E: jas.hayre@bnymellon.com

Christopher Mitchell
Head of UK Tax Services
Tel: +44 207 163 3016
E: christopher.mitchell@bnymellon.com

Gerard Rose
Head of U.S. Tax Services
Tel: +1 212 815 2087
E: gerard.rose@bnymellon.com

Colin Ware
Regulatory Product Manager
Tel: +44 20 7163 4675
E: colin.ware@bnymellon.com

Lorraine White
Global Head of Securities Tax Research and Client Tax Solutions
Tel: +44 207 163 3029
E: lorraine.white@bnymellon.com

Pilar Espejo
Global Head of Tax and Regulatory Research
Tel: +44.207.163.3036
E: pilar.espejo@bnymellon.com

Sophie Wong
Head of Tax and Regulatory Affairs, APAC
Tel: +852.2840.9762
E: sophie.wong@bnymellon.com

bnymellon.com

BNY Mellon is the corporate brand of The Bank of New York Mellon Corporation and may be used as a generic term to reference the corporation as a whole and/or its various group entities. This material and any products and services may be issued or provided under various brand names of BNY Mellon in various countries by duly authorized and regulated subsidiaries, affiliates, and joint ventures of BNY Mellon, which may include any of those listed below:

The Bank of New York Mellon, a banking corporation organized pursuant to the laws of the State of New York, whose registered office is at 240 Greenwich St, NY, NY 10286, USA. The Bank of New York Mellon is supervised and regulated by the New York State Department of Financial Services and the US Federal Reserve and is authorized by the Prudential Regulation Authority (PRA).

The Bank of New York Mellon operates in the UK through its London branch (UK companies house numbers FC005522 and BR000818) at One Canada Square, London E14 5AL and is subject to regulation by the Financial Conduct Authority (FCA) at 12 Endeavour Square, London, E20 1JN, UK and limited regulation by the Prudential Regulation Authority at Bank of England, Threadneedle St, London, EC2R 8AH, UK. Details about the extent of our regulation by the Prudential Regulation Authority are available from us on request.

The Bank of New York Mellon SA/NV, a Belgian limited liability company, registered in the RPM Brussels with company number 0806.743.159, whose registered office is at 46 Rue Montoyerstraat, B-1000 Brussels, Belgium, authorized and regulated as a significant credit institution by the European Central Bank (ECB) at Sonnemannstrasse 20, 60314 Frankfurt am Main, Germany, and the National Bank of Belgium (NBB) at Boulevard de Berlaimont/de Berlaimontlaan 14, 1000 Brussels, Belgium, under the Single Supervisory Mechanism and by the Belgian Financial Services and Markets Authority (FSMA) at Rue du Congrès/Congresstraat 12-14, 1000 Brussels, Belgium for conduct of business rules, and is a subsidiary of The Bank of New York Mellon.

The Bank of New York Mellon SA/NV operates in Ireland through its Dublin branch at Riverside II, Sir John Rogerson's Quay Grand Canal Dock, Dublin 2, D02KV60, Ireland and is registered with the Companies Registration Office in Ireland No. 907126 & with VAT No. IE 9578054E. The Bank of New York Mellon SA/NV, Dublin Branch is subject to limited additional regulation by the Central Bank of Ireland at New Wapping Street, North Wall Quay, Dublin 1, D01 F7X3, Ireland for conduct of business rules and registered with the Companies Registration Office in Ireland No. 907126 & with VAT No. IE 9578054E.

The Bank of New York Mellon SA/NV is trading in Germany as The Bank of New York Mellon SA/NV, Asset Servicing, Niederlassung Frankfurt am Main, and has its registered office at MesseTurm, Friedrich-Ebert-Anlage 49, 60327 Frankfurt am Main, Germany. It is subject to limited additional regulation by the Federal Financial Supervisory Authority (Bundesanstalt für Finanzdienstleistungsaufsicht, Marie-Curie-Str. 24-28, 60439 Frankfurt, Germany) under registration number 122721.

The Bank of New York Mellon SA/NV operates in the Netherlands through its Amsterdam branch at Strawinskylaan 337, WTC Building, Amsterdam, 1077 XX, the Netherlands. The Bank of New York Mellon SA/NV, Amsterdam Branch is subject to limited additional supervision by the Dutch Central Bank ('De Nederlandsche Bank' or 'DNB') on integrity issues only (registration number 34363596). DNB holds office at Westeinde 1, 1017 ZN Amsterdam, the Netherlands.

The Bank of New York Mellon SA/NV operates in Luxembourg through its Luxembourg branch at 2-4 rue Eugene Ruppert, Vertigo Building – Polaris, L- 2453, Luxembourg. The Bank of New York Mellon SA/NV, Luxembourg Branch is subject to limited additional regulation by the Commission de Surveillance du Secteur Financier at 283, route d'Arlon, L-1150 Luxembourg for conduct of business rules, and in its role as UCITS/AIF depositary and central administration agent.

The Bank of New York Mellon SA/NV operates in France through its Paris branch at 7 Rue Scribe, Paris, Paris 75009, France. The Bank of New York Mellon SA/NV, Paris Branch is subject to limited additional regulation by Secrétariat Général de l'Autorité de Contrôle Prudentiel et Première Direction du Contrôle de Banques (DCB 1), Service 2, 61, Rue Taitbout, 75436 Paris Cedex 09, France (registration number (SIREN) Nr. 538 228 420 RCS Paris – CIB 13733).

The Bank of New York Mellon SA/NV operates in Italy through its Milan branch at Via Mike Bongiorno no. 13, Diamantino building, 5th floor, Milan, 20124, Italy. The Bank of New York Mellon SA/NV, Milan Branch is subject to limited additional regulation by Banca d'Italia - Sede di Milano at Divisione Supervisione Banche, Via Cordusio no. 5, 20123 Milano, Italy (registration number 03351).

The Bank of New York Mellon (International) Limited is registered in England & Wales with Company No. 03236121 with its Registered Office at One Canada Square, London E14 5AL. The Bank of New York Mellon (International) Limited is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

Regulatory information in relation to the above BNY Mellon entities operating out of Europe can be accessed at the following website: <https://www.bnymellon.com/RID>.

The Bank of New York Mellon has various subsidiaries, affiliates, branches and representative offices in the Asia-Pacific Region which are subject to regulation by the relevant local regulator in that jurisdiction. Details about the extent of our regulation and applicable regulators in the Asia-Pacific Region are available from us on request. Among others, The Bank of New York Mellon, Singapore Branch is subject to regulation by the Monetary Authority of Singapore. The Bank of New York Mellon, Hong Kong Branch (a banking corporation organized and existing under the laws of the State of New York with limited liability) is subject to regulation by the Hong Kong Monetary Authority and the Securities & Futures Commission of Hong Kong. The Bank of New York Mellon, Seoul Branch is subject to regulation by the Financial Services Commission, the Financial Supervisory

Whilst The Bank of New York Mellon (BNY Mellon) is authorised to provide financial services in Australia, it is exempt from the requirement to hold, and does not hold, an Australian financial services license as issued by the Australian Securities and Investments Commission under the Corporations Act 2001 (Cth) in respect of the financial services provided by it to persons in Australia. BNY Mellon is regulated by the New York State Department of Financial Services and the US Federal Reserve under Chapter 2 of the Consolidated Laws, The Banking Law enacted April 16, 1914 in the State of New York, which differs from Australian laws.

The Bank of New York Mellon Securities Company Japan Ltd, subject to supervision by the Financial Services Agency of Japan, acts as intermediary in Japan for The Bank of New York Mellon and its affiliates, with its registered office at Marunouchi Trust Tower Main, 1-8-3 Marunouchi, Chiyoda-ku, Tokyo 100-1005, Japan.

If this material is distributed in, or from, the Dubai International Financial Centre ("DIFC"), it is communicated by The Bank of New York Mellon, DIFC Branch, regulated by the DFSA and located at DIFC, The Exchange Building 5 North, Level 6, Room 601, P.O. Box 506723, Dubai, UAE, on behalf of The Bank of New York Mellon, which is a wholly-owned subsidiary of The Bank of New York Mellon Corporation. This material is intended for Professional Clients and Market Counterparties only and no other person should act upon it.

Past performance is not a guide to future performance of any instrument, transaction or financial structure and a loss of original capital may occur. Calls and communications with BNY Mellon may be recorded, for regulatory and other reasons.

Disclosures in relation to certain other BNY Mellon group entities can be accessed at the following website: <http://disclaimer.bnymellon.com/eu.htm>.

This material is intended for wholesale/professional clients (or the equivalent only), is not intended for use by retail clients and no other person should act upon it. Persons who do not have professional experience in matters relating to investments should not rely on this material. BNY Mellon will only provide the relevant investment services to investment professionals.

Not all products and services are offered in all countries.

If distributed in the UK, this material is a financial promotion. If distributed in the EU, this material is a marketing communication.

This material, which may be considered advertising, is for general information purposes only and is not intended to provide legal, tax, accounting, investment, financial or other professional advice on any matter. This material does not constitute a recommendation or advice by BNY Mellon of any kind. Use of our products and services is subject to various regulations and regulatory oversight. You should discuss this material with appropriate advisors in the context of your circumstances before acting in any manner on this material or agreeing to use any of the referenced products or services and make your own independent assessment (based on such advice) as to whether the referenced products or services are appropriate or suitable for you. This material may not be comprehensive or up to date and there is no undertaking as to the accuracy, timeliness, completeness or fitness for a particular purpose of information given. BNY Mellon will not be responsible for updating any information contained within this material and opinions and information contained herein are subject to change without notice. BNY Mellon assumes no direct or consequential liability for any errors in or reliance upon this material.

This material may not be distributed or used for the purpose of providing any referenced products or services or making any offers or solicitations in any jurisdiction or in any circumstances in which such products, services, offers or solicitations are unlawful or not authorized, or where there would be, by virtue of such distribution, new or additional registration requirements.

© 2020 The Bank of New York Mellon Corporation. All rights reserved.