

FATCA

NN Investment Partners Belgium & Belgian domiciled funds

NN Investment Partners Belgium and the Belgian based funds for which it has been appointed as Management Company are to be considered as “Non-Reporting Financial Institution”.

A Non-Reporting Financial Institution will not need to obtain a Global Intermediary Identification Number (“GIIN”).

Entity NN Investment Partners	Category of Non-Reporting Financial Institution
NN Investment Partners Belgium NV/SA <i>Avenue Marnix 23, 1000 Brussels, Belgium</i> <i>RPM Brussels BE0403.241.371</i>	Investment advisors and investment managers, Deemed Compliant FFI
NN (B) Invest <i>Avenue Marnix 23, 1000 Brussels, Belgium</i> <i>RPM Brussels BE0466.252.472</i>	Collective investment vehicle held by certain owners, Deemed Compliant FFI
ING (B) Collect Portfolio <i>Avenue Marnix 23, 1000 Brussels, Belgium</i> <i>RPM Brussels BE0444.774.494</i>	Collective investment vehicle held by certain owners, Deemed Compliant FFI
Star Fund	Belgian Savings Fund, Exempt Beneficial Owner

BACKGROUND

The US Foreign Account Tax Compliance provisions (“**FATCA**”) are contained in the HIRE Act 2010. These provisions are U.S. legislation aimed at reducing tax evasion by U.S. citizens.

It requires Financial Institutions outside the U.S. to pass information about their U.S. customers to the U.S. tax authorities, the Internal Revenue Service (“**IRS**”). A 30% withholding tax is imposed on the U.S. source income of any Financial Institution that fails to comply with this requirement.

BELGIUM

On 23 April 2014 the Kingdom of Belgium and the U.S. signed an Agreement to implement FATCA in Belgium (“The Belgian-U.S. Agreement to Improve International Tax Compliance and to Implement FATCA”) referred to hereafter as “**the Agreement**”.

FATCA introduces through the U.S. Regulations the concept of a Foreign Financial Institution (“**FFI**”). This term applies to non-U.S. entities that meet the definition of a Financial Institution.

Under the Agreement, Belgian Financial Institutions will be classified either as a Reporting Belgian Financial Institution or as a Non-Reporting Belgian Financial Institution. As long as Belgian Financial Institutions are in compliance with the Belgian FATCA legislation they will not be subject to any withholding tax on their U.S. source income under Section 1471 of the U.S. Internal Revenue Code.

Under the Agreement Non-Reporting Financial Institutions qualify either as Exempt Beneficial Owners or Deemed Compliant Financial Institutions.

Non-Reporting Financial Institutions: Exempt Beneficial Owners and Deemed Compliant Financial Institutions

A Non-Reporting Belgian Financial Institution is any Financial Institution specifically described or identified as such in Annex II of the Agreement, or one which otherwise qualifies under Article 1. 1. q) of the Agreement as a Deemed Compliant Foreign Financial Institution or an Exempt Beneficial Owner under the relevant U.S. Treasury regulations in effect at the time of the signing of the Agreement.

A Non-Reporting Financial Institution will not need to obtain a Global Intermediary Identification Number (“GIIN”). Such entities do not have any reporting or registration requirements in relation to any Financial Accounts that they maintain. Reporting Belgian Financial Institutions will not be required to review or report on accounts held by Exempt Beneficial Owners and Deemed Compliant Financial Institutions. However, such entities are required to meet the specific conditions of the relevant Deemed Compliant Foreign Financial Institution or Exempt Beneficial Owner status, which might require, among other things, to identify the FATCA status of their account holders,

To the extent that any Entity qualifies as a Deemed Compliant Foreign Financial Institution under relevant U.S. Treasury regulations, whether as a registered or a certified Deemed Compliant Foreign Financial Institution, such institution would be treated as a Non-reporting Belgian Financial Institution. Such entities will not be required to register with the IRS or obtain the GIIN.

However there are two scenarios in which an entity which is treated as Deemed Compliant or Exempt Beneficial Owner under Annex II to the Agreement could still have some reporting obligations.

- That is where an entity meets the criteria of a Financial Institution with a Local Client Base, and has U.S. Reportable Accounts, or
- If an Exempt Beneficial Owner other than a Fund makes or receives a payment that is derived from an obligation held in connection with a commercial financial activity of the type engaged in by a Specified Insurance Company, Custodial Institution or Depository Institution.

Exempt Beneficial Owners and Deemed Compliant Financial Institutions are non-reporting entities that fall within the categories described in Annex II of the Agreement.

Investment Entities that qualify as “Deemed Compliant FFIs”

Investment advisors and investment managers are Non-Reporting Belgian Financial Institutions treated as Deemed Compliant Financial Institutions for purposes of sections 1741 of the U.S. Internal Revenue Code.

Investment advisors and investment managers are to be understood as an Investment Entity established in Belgium that is a Financial Institution solely because it (1) renders investment advice to, and acts on behalf of, or (2) manages portfolios for, and acts on behalf of, a customer for the purposes of investing, managing, or administering funds deposited in the name of the customer with a Financial Institution other than a Nonparticipating Financial Institution.

Collective investment vehicle held by certain owners are Non-Reporting Belgian Financial Institutions treated as Deemed Compliant Financial Institutions for purposes of sections 1741 of the U.S. Internal Revenue Code.

Collective investment vehicle held by certain owners is to be understood as an Investment Entity established in Belgium that is regulated as a collective investment vehicle, provided that all of the interests in the collective investment vehicle (including debt interests in excess of \$50,000) are held by or through one or more exempt beneficial owners, Active NFFEs described in Section 3.1., U.S. Persons that are not Specified U.S. Persons, or Financial Institutions that are not Nonparticipating Financial Institutions.

Funds that qualify as “Exempt Beneficial Owners”

Belgian Savings Funds are Non-Reporting Belgian Financial Institutions treated as Exempt Beneficial Owners for purposes of sections 1741 and 1742 of the U.S. Internal Revenue Code.

A Belgian Savings Funds are to be understood as a collective investment fund contemplated by Article 145/16 of the Income Tax Code 1992 (Code des impôts sur les revenus 1992), established for the investment of monies through a so-called collective savings account as part of a tax-favored pension savings scheme.

DISCLAIMER

The elements in this document have been prepared solely for the purpose of information and do not constitute an offer or an invitation to buy or sell any security or investment instrument or to participate in any trading strategy.

The information in this document may not be understood as an investment service of NN Investment Partners in the meaning of the law of August 2, 2002.

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For further details on the funds, we refer to the prospectus, the KIID and the periodic reports, that mention all the needed information on the product, its costs and its risks. The prospectus, the KIID and the periodic reports are available on the following website: www.nnip.be.

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