



Invest Northern Ireland

Cost Based Claims Guidance Notes

Claims Guidance Notes		
Version: 3.9	Issue Date 13/05/20	Review Date:31/12/21

Contents

1. COMPLETING YOUR CLAIM	3
1.1 Invest NI Claim Pack	3
1.2 Step-By-Step Guide	4
2. THE CLAIM FORM	5
3. COST SCHEDULES	6
3.1 Data Fields / Cell Types.....	6
3.2 When to include an expenditure item in a claim.....	7
4. PROJECT COST SCHEDULE	8
4.1 Invoice Details	8
4.2 Expenditure Details.....	9
4.3 Payment Details.....	9
4.4 Expenditure (Sterling /Sterling Equivalent)	10
4.5 Non-Sterling Currency Transactions Only	10
5. LABOUR COST – FULL SALARY SCHEDULE	11
5.1 Eligible Costs	11
5.2 Completing the Schedule - Full Salary Cost	11
6. LABOUR COSTS – PROJECT HOURS.....	12
6.1 Project Labour Cost	12
6.2 Eligible Hours.....	12
6.3 Project Hourly Rate.....	12
6.4 Completing the Schedule - Project / Training Hours Cost.....	13
7. PHR Schedule.....	14
8. SUPPORTING & ADDITIONAL SCHEDULES.....	15
8.1 Additional Schedule – Employee Reference	15
8.2 Activity List (Skills Growth Claims only).....	15
8.3 Stores Issues* – (R&D Claims only).....	15
8.4 Depreciation* (R&D Claims Only).....	17
9. SUBMITTING YOUR CLAIM.....	18
9.1 Supporting Documentation	18
GLOSSARY	19

1. COMPLETING YOUR CLAIM

1.1 Invest NI Claim Pack

Invest NI Claim Pack

All claims must be completed using the Invest NI Claim Pack downloaded from our website. The Claim Pack is provided in MS Excel format – claims submitted in other formats cannot be processed and will not be logged onto our systems.

Commence completing your claim by entering the required data onto the Claim Form.

Cost Schedules and Supporting Schedules are then completed as required for the particular grant type as set out in the following table:

GRANT TYPE	COST SCHEDULES			SUPPORTING SCHEDULES				Additional Schedule*
	Project Costs	Labour Costs – Full Salary	Labour Costs – Project Hours	PHR	Activity List	Stores Issues	Depreciation	
Capital	●							
Capital - Tourism	●							
CDS	●							
Collaborative Network	●							
Collaborative Grant for R&D	●	●	●	●		●	●	●
Digital Selling Capability	●							
Technical & Commercial POC Development	●	●	●	●		●	●	●
E-Business Investment	●							
Grant for R&D	●	●	●	●		●	●	●
Key Worker		●						
Management Salary		●						
Micro Business E-Commerce	●							
Operating	●							
Productive Investment Capital	●							
Process & Organisational Improvement Grant	●		●	●				
Project Definition	●		●	●		●	●	●
Resource Efficiency Capital	●							
Skills Advancement	●				●			
Skills Growth	●		●	●	●			●
TDI	●							
Supply Chain Resilience & Development Framework		●						
Trade Accelerator	●							
Brexit	●	●						

* Note – The Employee Reference Schedule is separate from the Claim Pack and can be downloaded from our website when required to be included in support of a claim.

1.2 Step-By-Step Guide

Step 1 - Complete Section A & B of the Claim Form

Your Letter of Offer may contain a number of grant paragraphs offering different types of grant for separate activities (e.g. Key Worker Grant, Development Grant etc.)

 A **separate** claim must be completed for each grant **type** and **paragraph**.

Step 2 - Complete relevant COSTS schedules:

- ✓ Project Costs
- ✓ Labour Costs - Full Salary
- ✓ Labour Costs - Project Hours
- ✓ PHR

Step 3 - Complete relevant supporting schedules (where required)

- ✓ Activity List;
- ✓ Depreciation;
- ✓ Stores Issues

Step 4 - Review Section C of the Claim Form

An estimate of grant payable is shown in Section C based on information you have provided on supporting schedules. The estimate is illustrative only – a grant computation sheet will issue following processing of your claim confirming any grant payable.

Step 5 - Review & Agree Declaration of the Claim Form

Review all the statements in the Declaration of the Claim Form after completing the relevant schedules.

You must let us know when you are unable to agree to any part of the declaration.

Step 6 - Complete Section D of the Claim Form


Step 7 - Submit your claim by email to claims@investni.com.

2. THE CLAIM FORM

The claim pack is protected to ensure the integrity of formulas. Unprotecting the claim form and/or individual schedules may compromise the integrity of computations and result in the claim being returned.

Complete Sections A, B and D.

Section C will auto populate following completion of all relevant cost schedules.

Section A	Guidance
A1. Claimant Name	The name of the legal entity submitting the claim.
A2. Project Title (if applicable)	The Project Title is provided on Page 1 of your letter of offer.
A3. Offer Reference (LoO)	The Letter of Offer (LoO) reference number can be found on Page 1 of your letter of offer.
A4. Grant Paragraph No	<p>Your Letter of Offer may contain a number of grant paragraphs offering different types of grant for separate activities (e.g. Key Worker Grant, Development Grant, Employment Grant etc.).</p> <p>Enter the paragraph number corresponding to the grant being claimed.</p> <p> A separate claim must be completed and submitted for each grant type and paragraph.</p>
A5. Grant % Rate	Enter the Grant % rate from your letter offer

Section B	Guidance
B1. Headcount	This information is requested for monitoring purposes only. The figure should include all current NI based employees of your business at the date of preparing / submitting your claim
B2. Date	Enter the date corresponding to the headcount figure at B1

Section C	This section will auto populate from information provided elsewhere on the Claim Pack
Section D	Provide contact details of a relevant person in your business who we can contact regarding the claim

3. COST SCHEDULES

3.1 Data Fields / Cell Types

Cost Schedules should be completed by entering data into all required fields against individual transactions.

- Mandatory Fields: data must be entered for each individual transaction.
- Conditional Fields: Data fields that are not mandatory (for example they relate to a specific grant type or a foreign currency transaction) should only be completed as required.
- Auto Populated Fields: auto populated from information provided elsewhere in your claim.

Mandatory, conditional and auto populated fields are colour coded on the Cost Schedules contained in the Claim Pack as follows

<p>AUTO-POPULATED</p> <p>No input required – Fields will auto-populate.</p>
<p>CONDITIONAL</p> <p>Input only as required – See guidance.</p>
<p>MANDATORY</p> <p>Input Compulsory – Data must be input into cells for each transaction item. Your Claim may not be processed if data has not been entered.</p>

Example – Project Costs Schedule

In the extract below, Columns I – N must be completed for every expenditure line claimed. Column H is only required for expenditure claimed under R&D grants. Columns O & P are only required when the claimed invoice has been issued in a foreign currency.

H	I	K	L	M	N	O	P
EXPENDITURE DETAILS		PAYMENT DETAILS		EXPENDITURE (STERLING / STERLING EQUIVALENT)		NON-STERLING CURRENCY TRANS	
SUBHEADING (R&D GRANTS ONLY)	DESCRIPTION OF EXPENDITURE TRAVEL: PURPOSE OF TRAVEL & DATES OF TRAVEL, NUMBER OF EMPLOYEES ATTENDING EVENT/ACTIVITY TRAINING: TRAINING DATES	PAID DATE	LAST 4 DIGITS OF ACCOUNT FROM WHICH PAYMENT HAS BEEN MADE	GROSS INVOICE AMOUNT(£)	CLAIMED EXPENDITURE (£)	CURRENCY OF INVOICE	GROSS INVOICE AMOUNT
Materials	Example Description of Expenditure	01/11/2020	1234	£1,120.00	£930.00	Euro	1,200.00

3.2 When to include an expenditure item in a claim

Project Costs relating to **eligible** project activity (i.e. those activities required to deliver the Project as outlined in the approved funding submission) may be claimed when the expenditure has been:

- **incurred** in the grant earning period.

The grant earning period can be found in Clause 2.1 within the Grant Annex of your Letter of Offer. Expenditure is typically incurred at the point in time when the goods / services have been delivered / consumed (e.g. when the labour is completed / consultancy work is provided / tangible goods have been delivered).

- **paid** before the end of the claim period.

“Paid” means that expenditure has been settled from a payment account under the control of the Letter of Offer holder or any other legal entity permitted in the Letter of Offer.

The date of payment is as per the payment account statement.



Expenditure should only be claimed when the expenditure has been incurred and paid

Example

ABC Ltd is in receipt of a development Letter of Offer issued 1 February 2019 providing assistance on eligible project activity for a period of 3 years from the date of issue until 31 January 2021 (the grant earning period).

ABC Ltd booked accommodation and flights in June 2020 relating to eligible project activity scheduled for later that year in November 2020. The flights were paid in full at the time of booking in June 2020. A deposit in respect of the accommodation was charged to the company credit card in July 2020 and the balance was paid directly to the hotel at the end of the hotel stay in November 2020. The business submits quarterly claims on calendar year basis.

The above expenditure should be included in the claim submitted for the quarter ended 31st December 2020 as this is the quarter when all the expenditure has been paid and incurred. Claims cannot be submitted in earlier quarters because the services (flight and accommodation) had not been delivered / completed (incurred).

4. PROJECT COST SCHEDULE

4.1 Invoice Details

Section	Guidance
Supplier Details	Enter details sufficient to identify the legal entity / supplier
Related Party	Use drop down [Y/N]. a related party is: <ol style="list-style-type: none">a. A person or other entity that has control or significant influence, directly or indirectly through one or more intermediaries, over the reporting entity;b. Another entity over which the reporting entity has control or significant influence, directly or indirectly through one or more intermediaries; orc. Another entity that is under common control with the reporting entity through:<ol style="list-style-type: none">I. Common controlling ownership;II. Owners who are close family members; orIII. Common key management.
Internal Reference Number	Internal reference number - The unique code/reference used in your accounting system to identify the invoice. If no internal reference used enter 'N/A'
Invoice Number	The invoice number as it appears on the invoice.
Invoice Date	The invoice date as it appears on the invoice.

4.2 Expenditure Details

Section	Guidance
Cost Category/Activity Code/Fixed Asset Reference Number (not applicable for R&D)	<p>Skills Growth and Advancement Offers: Enter the relevant Training Activity Codes from your training plan.</p> <p>Other grant types: the relevant Cost Category against each line item where identified on the Letter of offer Annex.</p> <p>Capital Grants: The unique fixed asset register reference number allocated to the piece of equipment on the asset register</p>
Subhead (R&D Grants Only)	Please select the relevant Subhead from the dropdown menu as referenced in your Letter of Offer Annex.
Description of Expenditure: (Goods & Services)	A brief description of the expenditure as per the narrative on the suppliers invoice sufficient to confirm the nature & eligibility of the cost
(Travel & Accommodation)	<ol style="list-style-type: none"> 1. Name of employee(s) travelling 2. Date(s) of Travel 3. From / To 4. Purpose of Travel (Sufficient Narrative to confirm eligibility) 5. Name(s) of persons / organisations being visited
(Training Grant)	A brief description and the training course and the date it was undertaken
(Capital Grants)	Description as per invoice - Exact location must be identified where asset register number has not been provided

4.3 Payment Details

Section	Guidance
Paid Date	The date that the payment cleared as evidenced on the relevant statement. (Please note this is <u>not</u> the BACS listing / authorisation date.)
Last 4 Digits of Account form which payment has been made	The last 4 digits of the relevant payment account

4.4 Expenditure (Sterling /Sterling Equivalent)

Section	Guidance
£ Gross Invoice Amount	The total invoice amount paid. (i.e the invoice amount less any discounts etc.) (Enter the Invoice Amount converted into GBP £ Sterling for amounts invoiced in a foreign currency (non-sterling))
£ Claimed Expenditure	The eligible project expenditure excluding VAT and any other costs not eligible under the terms of the Letter of Offer.

4.5 Non-Sterling Currency Transactions Only

Section	Guidance
Currency of Invoice	For non-Sterling invoices, enter the currency in which the invoice was issued.
Gross Invoice Amount	The gross amount (in currency of invoice) as stated on the invoice including tax.
Exchange rate (£1=)	The actual exchange rate applicable to the amount ultimately settled in a Sterling Account. Transactions settled from non-sterling financial accounts should be translated by using the HMRC Monthly Exchange Rates .

5. LABOUR COST – FULL SALARY SCHEDULE

5.1 Eligible Costs

Invest Northern Ireland grant supports the following two labour cost types:

- Full Salary - where the employee works exclusively on the project.
- Project Hours - where the employee does not work exclusively on the project

The eligible salary costs of a Full Salary supported worker is the basic gross pay paid before deductions but excluding:

- Employers National Insurance,
- Employers pension contributions and
- any other employer costs other than basic gross pay.

A worker must be a PAYE employee as evidenced by payroll records and a signed contract of employment.

5.2 Completing the Schedule - Full Salary Cost

Section	Guidance
Job Title	The employee's job title as per the contract of employment.
Employee Reference / Number	Enter the payroll reference number as per your payroll records*. Do not enter employee names. <i>* In cases where a payroll reference number does not exist, create a unique employee reference number by using the separately available "Employee Reference Schedule"</i>
Pay Period Ending	The end date of the pay period claimed (dd/mm/yyyy).
Basic Gross Salary	The basic gross pay paid to the employee before deductions but excluding Employers National Insurance, Employers pension contributions and any other employer costs other than basic gross pay.

6. LABOUR COSTS – PROJECT HOURS

6.1 Project Labour Cost

The cost of labour spent on eligible project activity by employees who do not work exclusively on the project is determined by:

Project Labour Cost = Eligible Hours x Project Hourly Rate

6.2 Eligible Hours

Hours spent by employees on eligible project activity and are:

- Capped to a maximum of 8 standard hours per day (unless expressly agreed otherwise in the Letter of Offer)
- Supported by a signed attendance record that includes as a minimum:
 1. Description of activity/training undertaken (and activity code if applicable)
 2. Date of activity/training
 3. Hours Spent on the activity/training
 4. Signature of Employee who undertook activity/training
 5. Signature of Appropriate Authoriser / Approver

6.3 Project Hourly Rate

The Project Hourly Rate is determined either as:

- A standard rate for all employees expressly stated in the letter of offer (R&D offers)

OR

- An employee-specific Project Hourly Rate (PHR) as calculated in the PHR schedule of the claim pack*

Please refer to your Project Owner or Client Executive in the event of any query.

6.4 Completing the Schedule - Project / Training Hours Cost

Expenditure is claimed for eligible hours spent on project / training activities on a daily basis for each employee.



Cols B-D : Skills Growth only.

Section	Guidance
Col B: Activity Code	The Activity Code must correspond to the Training Plan and a narrative provided on the Activity List.
Col C: CTP %	The Contribution To Production (CTP) % rate as per the agreed Training Plan if applicable. CPT% is <u>not</u> applicable to Trainers and should be left blank if claiming for Trainer costs (unless otherwise specified in the Letter of Offer)
Col D: Trainer	Select 'Trainer' from the drop-down list where the employee has acted in the capacity of trainer.



Cols E: G to be completed for ALL Project Hours claims

Section	Guidance
Col E: Date	The date on which the project activity took place. Hours spent on eligible project activity must be claimed daily – i.e a separate line item is required for daily hours for each employee claimed,
Col F: Daily Training/Project Hours	The total actual hours engaged on the activity / project on the day claimed (capped to 8 hours per day)
Col G: Employee Number	Labour Cost Schedules are be completed with employee numbers and not names in the interests of Data Protection. Enter the unique employee reference number (usually a payroll number) that identifies the employee in your records. Individual employees are identified against Unique Employee Reference Numbers in an Additional Schedule – “Employee Reference”
Cols H; J; K Day; Eligible Cost; Eligible Hours	Automatically calculated from information entered
Col I: Project Hourly Rate	Automatically populated from information provided in the PHR Schedule. (it is important to ensure that relevant information has been entered on the Employee Reference Schedule for all workers claimed)

7. PHR Schedule

The schedule calculates an employee-specific Project Hourly Rate (PHR).

- This schedule determines the Project Hourly Rate that will be used to calculate the eligible cost of time spent on eligible project activity by employees.
- The PHR schedule may be copied onto subsequent Claim Packs so that the schedule needs only to be updated with new employees working on the project.
- The PHR for employees on the “Labour Costs – Project Hours” cost schedule is updated automatically from the PHR schedule
- The PHR schedule must include all employees engaged in Project Activity.

Section	Guidance
Col B: Employee Number	The unique payroll reference number for the employee
Col C: Labour Cost Type	Select appropriate type from drop down menu: <ul style="list-style-type: none"> - Salaried; - Hourly Paid; - R&D Unit Cost (select relevant rate as per letter of offer); - Agency Staff
Col D: Basic Salary / Basic Hourly Rate Amount	All payroll information must relate to the first payroll period immediately preceding: <ul style="list-style-type: none"> • the project start date; or • the first claim submitted for the project using the PHR schedule; or • the employee start date (if later than periods above) <p>Basic Salary – enter the gross salary payable for the salary frequency selected (see below). For example, James is employed at an annual salary of £24,000 paid monthly. This can be entered as Basic Salary = £24,000, Frequency = Annual or Salary = £2,000, Frequency = Monthly</p> <p>Hourly Paid - the gross hourly rate as shown on payslip R&D Unit Cost - actual salary / wage of worker Agency Staff - hourly rate as invoiced from agency</p>
Col E: (Salaried Only) Salary Frequency (Salaried Employees Only)	Note: Salaried employee ONLY Select relevant option from the drop down menu: <ul style="list-style-type: none"> - Monthly - 4-Weekly - Fortnightly - Weekly
Col F: Contracted Weekly Hours	The contracted weekly hours as per contract
Col G: Standard Full-time Weekly Hours	Defaults to Contracted Weekly Hours for Full Time employees. <u>For Part Time salaried Employees only:</u> Enter the contracted weekly hours worked by a full time employee in an equivalent job
PHR	This will automatically calculate from data entered

8. SUPPORTING & ADDITIONAL SCHEDULES

8.1 Additional Schedule – Employee Reference

This is a separate document from the Claim Pack, can be downloaded from our website, and should be provided separately in the interests of Data Protection.

Labour Cost Schedules are completed with employee numbers and not names in the interests of Data Protection.

The Employee Reference schedule listing the name of the relevant individual and the Unique Employee Reference Number (usually payroll number) used on the claim pack must accompany the claim.

For R&D claims, you must also provide the Job Title in respect of all claimed workers.

8.2 Activity List (Skills Growth Claims only).

Enter the Activity Code and Activity Description as per your daily training record for all activities claimed.

8.3 Stores Issues* – (R&D Claims only).

*This schedule is hidden within the Claim Pack. If required please unlock it by right clicking on the tabs, clicking 'Unhide' and selecting it from the list.

The stocks and stores schedule is designed to collate the information relating to expenditure for items taken from internal stores.

If you have taken any materials from internal stores, enter the total amount of each stores requisition form as a single line on the Project Cost Schedule. The details of the individual items on each form should be entered onto the supporting Stores Issues Schedule.

The cost of items used from internal stores can only be reimbursed if a signed stores requisition form is available that clearly identifies the project.

The basis of determining unit costs must be as per normal and usual business practice – methodologies constructed exclusively for the purpose of drawing down grant are not eligible.

Additional costs such as overheads included in Unit Costs are not eligible.

A separate line for each material type should be entered.

Section	Guidance
Col B: Stores Requisition / Materials Issue Number	The unique number on the document that identifies the materials taken for use on the project.
Col C: Issue Date	The date that the requisition was signed or the date the materials were issued.
Col D: Material	A description of the materials taken from Stores.
Col E: Unit Cost	The cost per item that has been charged to the project.
Col F: Basis of Cost	The calculation methodology used to determine a unit cost e.g. <ul style="list-style-type: none"> • Average – Costs for set period (usually annual) averaged • FIFO – First In First Out – cost charged based on price on earliest invoice • LIFO • Current • Other
Col G: Quantity	The number of units of material taken from stores.
Col H: Claimed Cost [TRANSFER TOTAL AMOUNT TO PROJECT COST SCHEDULE]	This will automatically calculate from data entered. Transfer this amount onto the Project Costs Schedule – insert “STORES ISSUES – see schedule” as the narrative in Col I of the Project Costs Schedule

8.4 Depreciation* (R&D Claims Only)

*This schedule is hidden within the Claim Pack. If required please unlock it by right clicking on the tabs, clicking 'Unhide' and selecting it from the list.

The Depreciation Schedule is designed to collate the information relating to the costs for project equipment usage.

The Depreciation Schedule has to be completed to determine expenditure claimed for equipment which will not be fully utilised during the life of the project (i.e. equipment which will exist beyond the life of the project).

The total Depreciation Charge as per the Depreciation Schedule has to be entered into the Project Cost Schedule in one line under Depreciation Costs.

Section	Guidance
Description of Equipment	A brief description of the expenditure as per the narrative on the suppliers invoice. The description must be sufficient to identify the cost for the equipment as being eligible under the Letter of Offer.
Location	The location at which the equipment is kept.
Supplier Name & Address	The name and address of the supplier.
Invoice Number	The invoice number as it appears on the invoice.
Invoice Date	The invoice date as it appears on the invoice.
Gross Invoice Amount	The sterling equivalent of the total invoice amount paid.
Net Invoice Amount	The actual eligible claimed expenditure. This will exclude VAT and any other costs not eligible under the terms of the Letter of Offer. Where an invoice includes items/elements which are not eligible, the description of expenditure should be sufficiently detailed to facilitate the identification of the expenditure which is being claimed.
Paid Date	The date that the payment was cleared through the Payment Account. Please note, this is not the date a cheque was written or a payment approved but the date on which the payment left the Payment Account controlled by the Claimant.
Fixed Asset Register Reference	The unique reference number allocated to the piece of equipment.
Number of Months Claimed	The number of months included in the claim.
Monthly Depreciation Charge	The monthly depreciation charge for the piece of equipment.
Depreciation Charge for Period TRANSFER TOTAL AMOUNT TO PROJECT COST SCHEDULE	This will automatically calculate from data entered Transfer this amount onto the Project Costs Schedule – insert “DEPRECIATION – see schedule” as the narrative in Col I of the Project Costs Schedule

9. SUBMITTING YOUR CLAIM

All Cost Based claims must be completed using MS Excel. The Claim Pack is provided in MS Excel format – claims submitted in other formats cannot be processed and will not be logged onto our systems.

Please submit claims electronically via email to: claims@investni.com

Please include a subject title in the email when submitting your claim using the following naming convention:

Example:

Subject: **Claimant Name**/Letter of Offer Ref/**Claim Sequence Number**

Subject: **Business Ltd**/1345-101213456/**Claim No. 5**

9.1 Supporting Documentation

It is not necessary to include supporting documentation (e.g. Invoices, bank statements) when submitting the claim. A request for a sample of supporting documentation will be issued as part of the vouching process.

However, if you wish to send documentation with the claim, all papers must be:

- Sent electronically (do not send paper copies);
- Referenced with the relevant Line number and cost schedule type;
- Appropriately redacted;
- Sufficient to prove the cost(s) claimed has been incurred and paid.

GLOSSARY

Claimant – the legal entity named on the Letter of Offer.

Cost Schedule – fully itemised list of all expenditure being claimed.

Expenditure Incurred: expenditure against goods / services that have been delivered / consumed. E.g. when the labour is completed; consultancy work is provided; tangible goods delivered etc.

Paid Expenditure The settlement of a transaction discharged by a transfer of monies, via a bank account held by, or under the control of, the holder of the letter of offer or any legal entity identified in the letter of offer

Payment Account – all expenditure claimed must have ultimately been paid from a payment account held under the control of the legal entity to which the Letter of Offer is issued. Examples of payment accounts include Current and Deposit Bank Accounts, Credit Card Account, PayPal (or other online payment) Account etc. Note that where the letter of offer has been issued to an incorporated company, evidence of payment through personal director or employee accounts or personal credit cards is not sufficient. Payment must ultimately be paid from a payment account held under the control of the legal entity.

Earning Period – the time period in which allowable expenditure must be incurred and paid to be eligible under the Letter of Offer. This is stipulated in the Letter of Offer.

Supporting Schedule – schedule providing further information in support of particular expenditure claimed on Cost Schedules.

Grant Paragraph Number – the grant paragraph under which the expenditure is claimed (as per your Letter of Offer).

Funding Submission – the business plan or the application form (as appropriate) submitted to Invest NI by the Client and approved by Invest NI in support of the Client's application for the Financial Assistance setting out details of the Project and its implementation and completion. This includes any variations or amendments approved by Invest NI.

Related Party – a related party is:

- a. A person or other entity that has control or significant influence, directly or indirectly through one or more intermediaries, over the reporting entity;
- b. Another entity over which the reporting entity has control or significant influence, directly or indirectly through one or more intermediaries; or
- c. Another entity that is under common control with the reporting entity through:
 - i. Common controlling ownership;
 - ii. Owners who are close family members; or
 - iii. Common key management.