

# IMPORTANT NOTICE

**The Depository Trust Company**



**#:** 5246-09  
**Date:** July 2, 2009  
**To:** All Participants  
**Category:** Dividends  
**From:** International Services  
**Attention:** Operations, Reorg & Dividend Managers, Partners & Cashiers  
**Subject:** Tax Relief – Country: Korea  
SK Telecom Co Ltd CUSIP: 78440P108  
Record Date: 06/30/09 Payable Date: TBA  
EDS Cut-Off: 07/09/09 Documentation Cut-Off: 07/09/09 5PM

As directed in the notice, participants that have qualified beneficial holders that expect to benefit from the procedure should secure the required documentation.

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Non-Confidential

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Citibank, N.A.  
c/o Globe Tax Services, Inc.  
90 Broad Street, 16th Floor  
New York, NY 10004-2205



TO: All DTC Participants

FROM: Citibank, N.A. ADR Department

SUBJECT: **SK Telecom Co Ltd** CUSIP: **78440P108**

RECORD DATE: **June 30, 2009**

PAYABLE DATE: **TBA**

**SK Telecom Co Ltd** has declared a taxable cash dividend subject to multiple tax rates depending on country of residence of the beneficial owners of the ADSs. In order for holders to qualify for a reduced rate of withholding tax pursuant to an applicable tax treaty, Participants must provide to **Citibank, N.A. / GlobeTax**, the attached withholding certification regarding the beneficial owner of the ADSs as the Korean Tax Authorities require such information in order to establish entitlement to the benefits of the applicable tax treaty. **Additionally, under the ruling KukSeChung Jae 85-18, Participants now need to provide two (2) original certificates of residency in English from beneficial owners domiciled in Belgium or the Netherlands in order to receive a reduced withholding rate.** In the absence of sufficient proof that the non-resident holder qualifies for the benefits of a tax treaty, withholding tax will be at a rate of **22%**.

**In order for a Korea domiciled ADS holder to receive the 15.4% (Individual) or 0.0% (Institution) withholding rate, a verifiable identification number is required:**

Individuals - Passport/ Tax ID/ Resident Registration # are acceptable  
Residence Registration # is a 13-digit number (6digits-7digits)

Institutions - Company Registration/ Tax ID #  
Tax ID # is a 10-digit number (3digits-2digits-5digits)

**A COPY OF THE FORM OF IDENTIFICATION MUST BE SUBMITTED ALONG WITH THE WITHHOLDING CERTIFICATION FORM.**

**Participants using the DTC EDS system agree that the following criteria have been met:**

1. The Participant has determined that the beneficial owner of the shares (individual or legal entity) is a resident of a country with a current double taxation treaty with Korea and is eligible for a reduced withholding tax rate.
2. The Participant hereby certifies that it will indemnify Citibank, N.A., (and its agents) for any liability Citibank, N.A. may incur as a result of reliance upon information provided by such Participant in connection with an EDS election, a claim for refund, or a failure to provide information requested by the Korean Tax Authorities as described in items 5 and 6 below. Citibank, N.A. shall not be liable for failure to secure the refund.

3. The Participant understands that Citibank, N.A. shall not be liable for any loss due to foreign exchange fluctuation.
4. The Participant agrees to immediately return to Citibank, N.A. any funds erroneously received as a result of an improper EDS election or refund claim. In addition, The Participant agrees to pay any interest, additions to tax or penalties thereon.
5. If requested by the Korean Tax authorities (directly or indirectly), the Participant agrees to provide Citibank, N.A. with beneficial ownership information regarding the depositary receipts such as the names, entire addresses, the countries of residence for tax purposes, their dates of birth, tax identification numbers or social security numbers, as well as the number of depositary receipts for which the reduced rate of withholding tax was certified, the rate that was applied, and any other information that may be reasonably requested. Such information will be provided within two weeks of the Participant being informed of the request.
6. Except for residents of Belgium and The Netherlands, Certificates of Residency are not required in advance of an EDS election. However, the Korean Tax Authorities reserve the right to request that a Certificate of Residency be produced to support the EDS election. The Participant agrees to provide any Certificates of Residency requested pursuant to item 5.

**Please note that Korean law does not permit a non-resident holder to recover withheld tax directly from the Korean government even if the non-resident holder subsequently produces evidence that it was entitled to have tax withheld at a lower rate. All tax reclaims must be processed through the appropriate tax withholding agent in Korea.**

Participants can use the following tax chart to determine the beneficial owner's applicable tax rate. In order to certify for the country of residence and to apply for a favorable withholding tax rate for the beneficial owner(s), please input your election via the "EDS" system at DTC. In addition, please complete and return the attached certification to Citibank, N.A. / GlobeTax as well as attach any required certification of residency documentation. A failure to return the attached certification (on company letter paper, with an original signature) and certificates of residency on a timely basis will cause the dividend to be paid less the maximum withholding rate.

## ESP Electronic Submission Portal

powered by **GLOBETAX**

**Citibank, N.A., now offers ESP powered by GlobeTax, an electronic withholding tax submission system. This system allows for the secure and simplified transfer of beneficial owner level data from the Participant to Citibank, N.A. and creates applicable documentation on the Participants behalf. Submit the data online through the web site below, print out the document on letterhead, sign, and mail to Citibank, N.A. / GlobeTax along with the additional documentation (necessary for World Exempt entities and residents of Belgium, Republic of Korea, and the Netherlands).**

**These claims should be submitted through the following web site. (Requires a one-time registration)**

<https://www.globetaxesp.com>

**Please contact Ms. Jeanny Yang at 1-800-628-4646 if you have any questions about this process.**

If completed certifications are not provided to Citibank, N.A. / GlobeTax on or prior to July 9, 2009, to support an “EDS” election, the dividend on your holdings will be paid at the maximum withholding rate.

**NOTE: THE DEADLINE FOR CERTIFYING VIA “EDS” IS JULY 9, 2009.**  
**ORIGINAL CERTIFICATIONS MUST ARRIVE IN OUR OFFICES BY JULY 9, 2009.**

**RELIEF AT SOURCE PROCESSING IS SUBJECT TO A TAX RECLAIM PROCESSING FEE OF \$0.005 PER ADS.**

**POST PAY-DATE TAX RECLAIM PROCESSING IS SUBJECT TO A TAX RECLAIM PROCESSING FEE OF \$0.0075 PER ADS WITH A MINIMUM CHARGE OF \$25.**

For additional information on the certification process, please contact Jeanny Yang at Citibank, N.A./GlobeTax at 1-800-628-4646, and send the original certification to: Citibank, N.A./ GlobeTax, 90 Broad Street - 16th floor, New York, New York 10004.

( YOUR COMPANY LETTER HEAD )

To: Citibank, N.A. / Globe Tax Services
90 Broad Street 16th Floor
New York, New York 10004-2205
Phone: 1-800-628-4646 Fax: 1-800-633-4646

Re: Withholding Certification for SK Telecom Co Ltd Cusip: 78440P108

I / We the undersigned
(contact name)
authorized representative of
(DTC Participant name) holding ADRs at
of SK Telecom Co Ltd Cusip: 78440P108, request
(DTC PTS number)

that the upcoming cash dividend payable to holders as of June 30, 2009, be paid at the preferential rate(s) indicated below or as provided on the attached shareholders listing.

Table with 5 columns: Name of Beneficial Owner, Country of Residence, ADRs Held, Tax Rate, ID Number. Includes a row for 'FOR KOREAN RESIDENTS AND INSTITUTIONS ONLY' and a summary row 'PLEASE SEE ATTACHED (more than 7 Beneficial Holders)'.

TWO (2) ORIGINAL CERTIFICATES OF RESIDENCY IN ENGLISH ARE REQUIRED FOR BENEFICIAL OWNERS DOMICILED IN BELGIUM, OR THE NETHERLANDS.

PLEASE ACCOUNT FOR ALL SHARES INCLUDING UNCERTIFIED / INELIGIBLE BENEFICIARIES AT 22% WITHHOLDING RATE.

IF THERE ARE MORE THAN 7 BENEFICIAL OWNERS PLEASE CALL JEANNY YANG AT THE NUMBER ABOVE FOR A PRE-FORMATTED SPREADSHEET. PLEASE RETURN THE DISK AND THIS COVER LETTER ON LETTERHEAD WITH THE REQUIRED AUTHORIZED SIGNATURES TO THE ADDRESS ABOVE.

I/We have determined that the beneficial owner(s) of the shares (individual or legal entity) is eligible for the preferential rates as stated herein and I declare that I have performed all the necessary due diligence to satisfy myself as to the accuracy of the information submitted to me by these beneficial owners.

I/ We hereby certify that I/We will indemnify Citibank, N.A., (and its agents) for any liability Citibank, N.A. may incur as a result of reliance upon information provided by such Participant in connection with an EDS election, a claim for refund, or a failure to provide information requested by the Korean Tax Authorities.

TEL :
FAX:
X
Authorized Signature of Representative
Print Name of Signatory
Position of Signatory

PLEASE INCLUDE YOUR PHONE AND FAX NUMBER SO THAT WE CAN CONTACT YOU WITH ANY QUESTIONS THAT WE MIGHT HAVE.

**RECORD DATE: JUNE 30, 2009**

**Please refer to the following chart to determine withholding tax on dividend payments on Korean issues:**

<b>COUNTRY</b>		<b>TOTAL TAX RATE (%)</b>
Republic of Korea	Institutions	0.00
	Individuals	15.40
Mongolia		5.00
Azerbaijan		7.00
Albania, Brazil, Bulgaria, Chile, China, Croatia, Czech, Hungary, Jordan, Kuwait, Lao, Lithuania, Morocco, Myanmar, Oman, Poland, Romania, Russia, Saudi Arabia, Slovakia, Thailand, Vietnam, United Arab Emirates		10.00
Venezuela		11.00
Pakistan		12.50
Algeria, Australia, Austria, Bangladesh, Belarus, Belgium, Canada, Denmark, Egypt, Fiji, Finland, France, Germany, Greece, Iceland, Indonesia, Ireland, Israel, Italy, Japan, Kazakhstan, Luxembourg, Malta, Mexico, Netherlands, Nepal, New Zealand, Norway, Papua New Guinea, Portugal, Singapore, Slovenia, Spain, Sri Lanka, Sweden, Switzerland, Tunisia, Ukraine, United Kingdom, Uzbekistan		15.00
South Africa, USA		16.50
India, Turkey		20.00
Philippines		22.00
Malaysia	Labuan	22.00
	Others	15.00
Other Countries, Non-Certified holders		22.00

**PLEASE NOTE: TAX RATES ARE SUBJECT TO CHANGE**