# **DTCC** *Important Notice* The Depository Trust Company

B #:	0833-13		
Date:	May 23, 2013		
То:	All Participants		
Category:	Dividends		
From:	International Services		
Attention:	Operations, Reorg & Dividend Managers, Partners & Cashiers		
	**** <b>Revised</b> ****		
Subject:	<u><b>Tax Relief</b></u> – Country: Ireland		
Gubjeet.	Security: United Drug CUSIP: 910199108		
	<b><u>Record Date</u>: 05/20/2013 <u>Payable Date</u>: 07/31/2013</b>		

#### Relief at source will not be available for this dividend payment.

Participants can use DTC's Elective Dividend System (EDS) function over the Participant Terminal System (PTS) or TaxRelief option on the Participant Browser System (PBS) web site to certify all or a portion of their position entitled to the applicable withholding tax rate. Participants are urged to consult the PTS or PBS function TAXI or TaxInfo respectively before certifying their elections over PTS or PBS.

Important: Prior to certifying tax withholding elections, participants are urged to read, understand and comply with the information in the Legal Conditions category found on TAXI or TaxInfo in PTS or PBS respectively. Questions regarding this Important Notice may be directed to GlobeTax.

**Important Legal Information**: The Depository Trust Company ("DTC") does not represent or warrant the accuracy, adequacy, timeliness, completeness or fitness for any particular purpose of the information contained in this communication, which is based in part on information obtained from third parties and not independently verified by DTC and which is provided as is. The information contained in this communication is not intended to be a substitute for obtaining tax advice from an appropriate professional advisor. In providing this communication, DTC shall not be liable for (1) any loss resulting directly or indirectly from mistakes, errors, omissions, interruptions, delays or defects in such communication, unless caused directly by gross negligence or willful misconduct on the part of DTC, and (2) any special, consequential, exemplary, incidental or punitive damages.

To ensure compliance with Internal Revenue Service Circular 230, you are hereby notified that: (a) any discussion of federal tax issues contained or referred to herein is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties that may be imposed under the Internal Revenue Code; and (b) as a matter of policy, DTC does not provide tax, legal or accounting advice and accordingly, you should consult your own tax, legal and accounting advisor before engaging in any transaction. Non-Confidential

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**UNITED DRUG** has announced a cash dividend. BNY Mellon acts as the sole Depositary for the company's American Depositary Share ("DS") program.

On Depositary Share Pay Date, all holders will receive the dividend net of the full 20% Irish withholding tax with the ability to reclaim as outlined in the Long Form Eligibility Matrix.

\*\*Relief at source will not be available for this dividend payment.\*\*

## DIVIDEND EVENT DETAILS

COUNTRY OF ISSUANCE	IRELAND		
ISSUE	UNITED DRUG		
CUSIP#	910199108		
DEPOSITARY	BNY MELLON		
DEPOSITARY SHARE RECORD DATE	May 20, 2013		
DEPOSITARY SHARE PAY DATE	July 31, 2013		
DEPOSITARY SHARE GROSS DIVIDEND RATE ON PAY DATE	ТВА		
ORD GROSS DIVIDEND RATE ON PAY DATE	EUR 0.0261		
RATIO	2 ORD : 1 DS		
STATUTORY WHT RATE	20%		

CHARGES & DEADLINES					
FILING METHOD	BATCH	PAYMENT METHOD	DEPOSITARY SERVICE CHARGE	MINIMUM SERVICE CHARGE PER BENEFICIAL OWNER	EDS ELECTIONS MUST BE MADE BY (ALL TIMES EST)
RELIEF AT SOURCE	N/A	N/A	N/A	N/A	NO RELIEF AT SOURCE WILL BE OFFERED ON THIS DIVIDEND PAYMENT
LONG FORM	POST-EDS PROCESS; ONGOING	CHECK	Up to \$0.0075 per Depositary Share ("DS")	\$25.00	December 15, 2017; 5:00 P.M.

LONG FORM ELIGIBILITY MATRIX				
RATE DESCRIPTION	RECLAIM RATE	ELIGIBLE RESIDENTS	DOCUMENTATION REQUIRED	
EXEMPT U.S. 0%	20%		1. COVER LETTER 2. DTC PARTICIPANT POWER OF ATTORNEY	
EXEMPT NON-U.S.** 0% 20% BAHRAIN, BELARUS, BELGIUM, BOSH HERZEGOVINA, BULGARIA, CANADA CHINA, CROATIA, CYPRUS, CZECH R DENMARK, EGYPT, ESTONIA, FINLAN GEORGIA, GERMANY, GREECE, HON HUNGARY, ICELAND, INDIA, ISRAEL, JAPAN, KOREA, KUWAIT, LATVIA, LIT LUXEMBOURG, MACEDONIA, MALAY MEXICO, MOLDOVA, MONTENEGRO, THE NETHERLANDS, NEW ZEALAND, PAKISTAN, PANAMA, POLAND, PORT QATAR, ROMANIA, RUSSIA, SAUDI AF SERBIA, SINGAPORE, SLOVAK REPU SLOVENIA, SOUTH AFRICA, SPAIN, S SWITZERLAND, THE REPUBLIC OF TU UKRAINE, UNITED ARAB EMIRATES,		ALBANIA, ARMENIA, AUSTRALIA, AUSTRIA, BAHRAIN, BELARUS, BELGIUM, BOSNIA & HERZEGOVINA, BULGARIA, CANADA, CHILE, CHINA, CROATIA, CYPRUS, CZECH REPUBLIC, DENMARK, EGYPT, ESTONIA, FINLAND, FRANCE, GEORGIA, GERMANY, GREECE, HONG KONG, HUNGARY, ICELAND, INDIA, ISRAEL, ITALY, JAPAN, KOREA, KUWAIT, LATVIA, LITHUANIA, LUXEMBOURG, MACEDONIA, MALAYSIA, MALTA, MEXICO, MOLDOVA, MONTENEGRO, MORROCO, THE NETHERLANDS, NEW ZEALAND, NORWAY, PAKISTAN, PANAMA, POLAND, PORTUGAL, QATAR, ROMANIA, RUSSIA, SAUDI ARABIA, SERBIA, SINGAPORE, SLOVAK REPUBLIC, SLOVENIA, SOUTH AFRICA, SPAIN, SWEDEN, SWITZERLAND, THE REPUBLIC OF TURKEY, UKRAINE, UNITED ARAB EMIRATES, UNITED KINGDOM, UZBEKISTAN, VIETNAM, ZAMBIA	<ol> <li>COVER LETTER</li> <li>DTC PARTICIPANT POWER OF ATTORNEY</li> <li>BENEFICIAL OWNER POWER OF ATTORNEY</li> <li>DIVIDEND WITHHOLDING TAX REFUND CLAIM FORM</li> <li>COMPOSITE NON- RESIDENT V2 FORM</li> </ol>	
EXEMPT ELIGIBLE IRISH ENTITIES 0%	20%	IRISH RESIDENT COMPANIES, PENSION SCHEMES, QUALIFYING EMPLOYEE SHARE OWNERSHIP TRUSTS, COLLECTIVE INVESTMENT UNDERTAKINGS OR CHARITIES	<ol> <li>COVER LETTER</li> <li>DTC PARTICIPANT POWER OF ATTORNEY</li> <li>BENEFICIAL OWNER POWER OF ATTORNEY</li> <li>DIVIDEND WITHHOLDING TAX REFUND CLAIM FORM</li> <li>COMPOSITE RESIDENT V3 FORM</li> </ol>	

DESCRIPTION OF VARIOUS LONG FORM DOCUMENTATION
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DOCUMENT NAME	CUMENT NAME DESCRIPTION		SIGNATURE REQUIREMENT
COVER LETTER (APPENDIX A)	Cover letter required for all long form claims	ORIGINAL	DTC PARTICPANT
DWT REFUND CLAIM FORM	Claim for repayment of Irish tax on dividends form.	ORIGINAL	DTC PARTICPANT OR FINAL BENEFICIAL OWNER
NON-RESIDENT V2 FORM	Irish dividend withholding tax exemption declaration form for non-U.S relevant territory beneficial owners. This form needs to be certified by the beneficial owner's local tax office for non-U.S. entities.	ORIGINAL	DTC PARTICPANT OR FINAL BENEFICIAL OWNER
COMPOSITE RESIDENT V3 FORM	Irish dividend withholding tax exemption declaration form for eligible Irish beneficial owners.	ORIGINAL	DTC PARTICPANT OR FINAL BENEFICIAL OWNER
BENEFICIAL OWNER POWER OF ATTORNEY	A document issued by the beneficial owner to the DTC Participant if the Participant is signing the Dividend Withholding Tax Refund Claim Form or Composite Non-Resident V2 form on behalf of the beneficial owner. This document must be on the beneficial owner's letterhead.	COPY	FINAL BENEFICIAL OWNER
DTC PARTICIPANT POWER OF ATTORNEY (APPENDIX B)	A document issued by the DTC Participant to the Depositary authorizing the Depositary to file the long form reclaim and receive payment on the Participant's behalf. This document must be on the DTC Participant's letterhead.	COPY	DTC PARTICIPANT

CONTACT DETAILS			
PRIMARY CONTACT	APRIL RICHLAND		
DOMESTIC PHONE (U.S.)	1-800-915-3536		
DOMESTIC FAX (U.S.)	1-800-985-3536		
INTERNATIONAL PHONE	1-212-747-9100		
INTERNATIONAL FAX	1-212-747-0029		
EMAIL ADDRESS	APRIL_RICHLAND@GLOBETAX.COM		
COMPANY	BNY MELLON in C/O GLOBETAX SERVICES		
STREET ADDRESS	90 BROAD STREET, 16 <sup>TH</sup> FLOOR ATTN: APRIL RICHLAND		
CITY/STATE/ZIP	NEW YORK, NY 10004		
ADDITIONAL CONTACTS	GINA SERODA		
	DANIELA NINOV		

FREQUENTLY ASKED QUESTIONS (FAQs)				
QUESTION	ANSWER			
WHAT IS THE DIFFERENCE BETWEEN THE V2 FORMS A, B, AND C AND WHICH ONE NEEDS TO BE COMPLETED?	THE V2 FORMS A, B, AND C EACH PERTAIN TO DIFFERENT ENTITY TYPES AND SHOULD BE SELECTED BASED ON THE STRUCTURE OF THE FINAL BENEFICIARY. QUALIFYING NON-RESIDENT INDIVIDUALS MUST USE THE V2A, QUALIFYING NON-RESIDENT COMPANIES MUST USE THE V2B, AND ALL OTHER QUALIFYING NON-RESIDENT PERSONS (NOT BEING AN INDIVIDUAL OR A COMPANY) MUST USE THE V2C.			
CAN I SUBMIT A TRUST AGREEMENT IN LIEU OF A POA SIGNED BY THE BENEFICIAL OWNER?	YES, BUT A LIMITED POA SIGNED BY THE PARTICIPANT MUST BE ACCOMPANIED BY THE TRUST AGREEMENT			
HOW LONG DOES IT TAKE FOR LONG FORM CLAIMS TO BE PAID?	WE ESTIMATE IT TAKES 4 MONTHS FOR LONG FORM CLAIMS TO BE PAID			
DOES THE LONG FORM PROCESS HAVE A MINIMUM POSITION REQUIRMENT PER BENEFICIAL OWNER?	NO, THERE IS A MINIMUM FEE OF \$25 PER BENEFICIAL OWNER WHICH MAY BE WAIVED ON AN EXCEPTIONAL BASIS FOR CLIENTS RECLAIMING LESS THAN \$50. IN SUCH INSTANCES A FEE OF 50% OF THE RECLAIMED AMOUNT WILL BE APPLIED.			
WHAT IS THE STATUTE OF LIMITATIONS FOR FILING IRISH RECLAIMS?	IT IS 4 YEARS FROM ORDINARY PAY DATE. CLAIMS RECEIVED AFTER OUR SUBMISSION DEADLINE WILL BE FILED ON A BEST EFFORT BASIS.			

/ILL BNY MELLON ACCEPT CLAIMS FILED DIRECTLY O THEM BY THE BENEFICIAL OWNERS?	BNY MELLON ONLY ACCEPTS CLAIMS FILED BY THE DTC PARTICIPANT WHO WAS HOLDING THE SECURITIES THROUGH DTC AND ONLY TO THE EXTENT THAT DTC HAS REPORTED THESE HOLDINGS TO US AS VALID RECORD DATE HOLDINGS. BENEFICIAL OWNERS ARE REQUIRED TO FILE THEIR CLAIMS THROUGH THE CUSTODY CHAIN TO THE DTC PARTICIPANT OF RECORD. ALL CLAIMS NOT RECEIVED DIRECTLY FROM THE DTC PARTICIPANT WILL BE RETURNED TO THE BENEFICIAL OWNER.
S THE PROCESS FOR TAX RELIEF OFFERED BY NY MELLON AN OPTIONAL PROCESS?	YES, THIS IS A DISCRETIONARY, OPTIONAL SERVICE, HOWEVER, IN THE IRISH MARKET; THE IRISH REVENUE COMMISSIONERS WILL NOT ACCEPT CLAIMS FROM ANYONE EXCEPT BNY MELLON WITHOUT A PROPER CERTIFICATION OF PAYMENT ISSUED BY BNY MELLON WHICH VALIDATES THE RECORD DATE POSITIONS CLAIMED. CLAIMS SUCH AS CLAIMS FILED UNDER A EUROPEAN COURT OF JUSTICE ("ECJ") RULING MAY BE FILED DIRECTLY TO THE IRISH REVENUE COMMISSIONERS WITH A PROPER TAX VOUCHER/CERTIFICATION OF PAYMENT ISSUED BY BNY MELLON. THESE FORMS ALSO MUST BE SECURED BY BNY MELLON AND ARE SUBJECT TO A FEE OF UP TO \$0.0075 PER DEPOSTARY SHARE
S THIS LONG FORM PROCESS FREE OF HARGE?	NO. THIS TAX RECLAIM ASSISTANCE SERVICE IS WHOLLY VOLUNTARY AND DISCRETIONARY AND OUTSIDE THE TERMS AND CONDITIONS OF ANY APPLICABLE DEPOSIT AGREEMENT. FEES WILL BE CHARGED FOR THIS ASSISTANCE SERVICE OF UP TO \$0.0075 PER DEPOSITARY SHARE WITH A MINIMUM OF \$25.00. RECLAIMS RECEIVED POST DEADLINE CANNOT BE ASSURED AND MAY BE SUBJECT TO A CUSTODIAL FEE AND ANY OTHER CHARGES, FEES OR EXPENSES PAYABLE BY OR DUE TO BNY MELLON OR ITS AGENTS, INCLUDING THE CUSTODIAN OR AUTHORITIES. IN ADDITION, CHARGES MAY APPLY TO ANY LONG FORM CLAIMS REJECTED OR NOT ACCEPTED BY THE IRISH REVENUE COMMISSIONERS. FEES PAID TO BNY MELLON MAY BE SHARED WITH ITS AGENTS.

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

- 1. The Participant has determined that the direct beneficial owner of the shares (individual or legal entity) is a resident of the United States who is eligible for the 0% Irish withholding tax rate. The direct beneficial owner of the shares to be paid at the exempt rate has a U.S. address on the participant's books and records. (For these beneficial owners, supporting documentation for EDS certification of the exempt rate consists of the books and records of the participant, showing a U.S. address for the direct beneficial owner, and need not be supported by a certificate of U.S. tax residence or by an application for exemption from Irish dividend withholding tax.) This is not tax advice. Please consult your tax advisor.
- 2. The Participant hereby certifies that it will indemnify BNY Mellon (and its agents) for any liability it 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 Irish Tax Authorities. BNY Mellon shall not be liable for any failure to secure a refund.
- 3. The Participant shall be liable for any loss due to foreign exchange fluctuations.
- 4. The Participant agrees to immediately return to BNY Mellon 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.

#### Warning and Disclaimer:

BNY Mellon will not be responsible for the truth or accuracy of any submissions received by it and, by following the procedures set forth herein or otherwise submitting any information, all submitting holders of DSs, and their agents, shall be agreeing to indemnify and hold harmless BNY Mellon and its agents for any and all losses, liabilities, fees and expenses (including reasonable fees and expenses of counsel) incurred by any of them in connection therewith or arising there from. BNY Mellon and its agents will be relying upon the truth and accuracy of any and all submissions received by them in connection with the tax relief process and shall hold submitting holders of DSs and their agents, liable and responsible for any losses incurred in connection therewith or arising there from. There is no guarantee that the applicable tax authorities or the applicable issuer will accept submissions for relief. Neither BNY Mellon nor its agents shall be responsible or liable to any holders of DSs in connection with any matters related to, arising from, or in connection with the tax relief process described herein.

## \*IRISH INDIVIDUALS <u>**DO NOT**</u> QUALIFY FOR 20% REFUND.

### <u>\*\*THE BENEFICIAL OWNER MUST NOT BE CONTROLLED OR OWNED BY IRISH</u> <u>RESIDENTS</u>

## **APPENDIX A – COVER LETTER**

#### (DTC Participant's Letterhead)

GlobeTax as agent for BNY Mellon 90 Broad Street, 16th Floor New York, New York 10004-2205 Phone: 1-800-915-3536 Fax: 1-800-985-3536 ATTN: Irish Reclaims

### Re: Withholding Certification for UNITED DRUG ; CUSIP# 910199108

We, **<DTC Participant Name>**, a Specified Intermediary (SI) by virtue of our agreement with DTC, also known under DTC participant number **0000**, acting on behalf of the beneficial owners of the DS income specified below claim repayment of **XXX EUR**. This repayment is in respect of DWT deducted from a relevant distribution made by **UNITED DRUG (Cusip: 910199108)** on the record date of **May 20, 2013** We declare that the beneficial owners of the dividends to which this repayment claim relates are entitled to receive the distribution without the deduction of DWT in accordance with Chapter 8A, Part 6 of the Taxes Consolidation Act, 1997 due to **<Beneficial Owners Country of Residence>** membership in the EU or because of an existing Double Taxation Treaty between **<Beneficial Owners' Country of Residence>** and Ireland. In addition, we hereby state that these shares are held in a nominee capacity only and we therefore receive no beneficial interest from them; all monies repaid by Revenue will be paid to the underlying beneficial owners.

Below is the list of beneficial owners and their respective holdings, which total <u><Number of DSs held></u> DSs. *Please note the ratio for this dividend of Ordinary shares to DSs is 2 : 1.* The information is as follows:

Beneficial Owner Name	Address	Taxpayer I.D. Number	<u># of DS(s)</u>	# of Ordinary Shares
1)				
2)				
3)				
4)				
5)				

We ask that BNY Mellon apply to the Irish Revenue Commissioners for the reduced withholding tax rate on the above beneficial owners' behalf. Please contact the undersig  $\pm 7$ 

We certify that to the best of our knowledge that each of the beneficial owners identified above are eligible for the preferential rates as stated herein and we declare that we have performed all the necessary due diligence to satisfy ourselves as to the accuracy of the information submitted to us by these beneficial owners.

We will be fully liable for any and all claims, penalties and / or interest, including without limitation, any foreign exchange fluctuations associated therewith. BNY Mellon shall not be liable for the failure to secure any refund. In consideration of the assistance of BNY Mellon and the custodian in processing such claims, we expressly agree that BNY Mellon and its agents or affiliates shall not have any liability for, and we shall indemnify, defend and hold each of BNY Mellon and its agents and affiliates harmless from and against, any and all loss, liability, damage, judgment, settlement, fine, penalty, demand, claim, cost or expense (including without limitation fees and expenses of defending itself or enforcing this agreement) arising out of or in connection herewith.

Sincerely,

[Signature of authorized signatory for DTC Participant]

#### [NAME AND TITLE OF AUTHORIZED OFFICER FOR DTC PARTICIPANT]

PAYMENT ADDRESS: \_\_\_\_\_

\_\_\_\_\_

## **APPENDIX B**

#### \*\*\*THIS DOCUMENT MUST BE PREPARED ON COMPANY LETTERHEAD\*\*\*

Power of Attorney

(Name of Broker), with address in (City, State, Country) hereby appoints <u>BNY Mellon ("Bank")</u> and/or the Bank's designated standing proxy(ies) as its true and lawful attorney with full Power of Attorney to do all or any of the following acts with respect to the American Depository Receipts representing shares in

("Securities") that the Bank holds in its safe custody on behalf of the Undersigned broker/agent.

- i) To file required forms with competent tax authorities in order to secure any tax privileges and benefits such as tax reduction or tax-exemption at source.
- ii) To receive on behalf of the Undersigned tax repayments made by competent tax authorities as a result of lodging reclaim forms.

The Undersigned also authorizes the Bank and/or the Bank's designated standing proxy(ies) to submit this power of attorney or a photocopy of it to competent tax authorities.

(the Name of the broker representative)

\_<Place and Date>\_
Place and Date

<Signature of broker representative>\_

Authorized Signature(s)/Title(s)