



Important Notice
The Depository Trust Company

B #:	0987-13
Date:	June 13, 2013
To:	All Participants
Category:	Dividends
From:	International Services
Attention:	Operations, Reorg & Dividend Managers, Partners & Cashiers
Subject:	<u>Tax Relief</u> – Country: Russia OAO TMK 144A CUSIP: 87260R102 <u>Record Date: 05/21/2013 Payable Date: TBA</u> <u>EDS Cut-Off: 07/26/2013 8:00 P.M.</u>

Participants can use DTC’s Elective Dividend System (EDS) function over the Participant Terminal System (PTS) or Tax Relief 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.

Questions regarding this Important Notice may be directed to GlobeTax 212-747-9100.

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.

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Non-Confidential



BNY MELLON

OAO TMK- 144A (Cusip# 87260R102) has announced a dividend. BNY Mellon acts as Depositary (the "Depositary") for the company's Depositary Share (DS) program.

The Depositary has been informed that the dividend distribution would be subject to Russian withholding tax and, as a result, where a non-Russian resident holder of the DS receives Russian sourced income, Russian withholding tax may be reduced or eliminated in accordance with the provisions of an applicable double taxation treaty ("DTT"); residents of territories that have signed a DTT with the Russian Federation may be entitled to a reduced tax treaty rate of 0%¹, 5%, 10%, or 12% rather than the Russian statutory withholding tax rate of 15%. The Depositary has further been informed that treaty relief may be available for those eligible, subject to the requirements of the laws of the Russian Federation and that in order for the non-resident holder to qualify for the benefits of an applicable DTT, documentary evidence is required to confirm the applicability of a DTT for which benefits are claimed (see below for detailed information).

DIVIDEND EVENT DETAILS	
COUNTRY OF ISSUANCE	RUSSIAN FEDERATION
ISSUE	OAO TMK-144 A
CUSIP#	87260R102
DEPOSITARY	BNY MELLON
DEPOSITARY SHARE RECORD DATE	MAY 21, 2013
DEPOSITARY SHARE PAY DATE	TBA
DEPOSITARY SHARE GROSS DIVIDEND RATE ON PAY DATE	\$ TBA
ORD GROSS DIVIDEND RATE ON PAY DATE	RUB 0.84
RATIO	4 ORDS : 1 DS
STATUTORY WHT RATE	15%

However, current Russian regulations do not recognize the concept of a foreign nominee. BNY Mellon as Depositary and holder of underlying shares of Russian issuers, by Russian law is considered to be the owner of these shares. Russian law does not recognize Depositary Share holders as beneficiaries of the dividend funds, and as a result, in most cases double tax treaty benefits are not available to any owners of Depositary Shares. The Russian issuers play the role of tax agents during dividend distribution, and the final decision on whether tax treaty benefits are extended to Depositary Share holders rests with them.

The Depositary strongly recommends that holders of DSs consult with their own tax and legal advisors in order to determine the applicability of any double tax treaties concluded by Russia and to determine whether any benefits there under are applicable or available.

The Depositary 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 the Depositary 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. The Company will be relying upon the truth and accuracy of any and all submissions received by them in connection with the relief at source process and may 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 tax authorities of the Russian Federation will accept submissions made. Neither the Depositary nor its agents shall be responsible or liable to any

¹ 0% withholding tax rate is applicable to a very limited number of countries and situations – see Attachment.

holders of DSs in connection with any matters related to, arising from, or in connection with the relief at source process described herein.

CHARGES & DEADLINES				
FILING METHOD	BATCH	PAYMENT METHOD	TAX RELIEF PROCESSING FEE	FINAL SUPPORTING DOCUMENT SUBMISSION DEADLINE (ALL TIMES ET)
RELIEF AT SOURCE	PAYMENT ON PAY DATE	VIA DTC	Up to \$0.005 PER DEPOSITARY SHARE, MAXIMUM 40% OF RECOVERY AMOUNT – MINIMUM OF \$1,000.00 USD.	JULY 26, 2013 8:00 P.M.

TAX RELIEF ELIGIBILITY MATRIX			
RATE DESCRIPTION	ELIGIBLE RESIDENTS	DOCUMENTATION REQUIRED	FINAL DOCUMENT SUBMISSION DEADLINE (ALL TIMES EST)
UNFAVORABLE - 15%	RUSSIA, AND ALL COUNTRIES NOT LISTED ON LIST OF DOUBLE TAX TREATIES	NO DOCUMENTATION REQUIRED	N/A
FAVORABLE – 0%, 5%, 10% or 12% TAX TREATY*	SEE ATTACHMENT FOR INDICATIVE LIST OF DOUBLE TAX TREATIES ²	<ol style="list-style-type: none"> 1) CERTIFICATE OF RESIDENCY 2) DTC PARTICIPANT COVER LETTER (APPENDIX A) 3) CONFIRMATION LETTER (APPENDIX B) WITH CERTIFICATE OF AUTHORIZED PERSONS, IF APPLICABLE 4) PARTICULAR TREATY REQUIREMENTS, IF NECESSARY 	on or before JULY 26, 2013 8:00 P.M.
FAVORABLE - 10% TAX TREATY	UNITED STATES OF AMERICA	<ol style="list-style-type: none"> 1) IRS FORM 6166 2) DTC PARTICIPANT COVER LETTER (APPENDIX A) 3) CONFIRMATION LETTER (APPENDIX B) WITH CERTIFICATE OF AUTHORIZED PERSONS, IF APPLICABLE 	on or before JULY 26, 2013 8:00 P.M.

Participating in Relief At Source is wholly voluntary and discretionary; however, it is the only way to obtain the reduced withholding tax rate on the payable date.

² Please note that the list is provided for indicative purposes only. BNY Mellon cannot assure completeness and correctness of the list. The beneficial owners should apply to their own tax advisors with respect to confirmation of existence of the respective double tax treaty as well as applicable withholding tax rate.

Certification of Residency

Must be certified with an apostille by the relevant authorities, translated into Russian, and notarized by a Russian notary.

For residents of the United States: An original U.S. IRS Form 6166 for Tax Year 2013, certified for the Russian Federation, must be provided for each beneficial owner of the dividends. **The Form 6166 must be certified with an apostille by the U.S. Department of State in Washington, DC.**

Form 6166 must contain the following statement:

“<Name of Beneficial Owner> is/was a resident in the United States of America during the year 2013 in the sense of the DTT between the Russian Federation and the United States of America.”

For residents of other treaty countries: A letter from the taxation authorities of the beneficial owner’s country of residence, certifying that the beneficial owner of the DSs on which dividends are being received is a resident of that treaty country under the meaning of the Double Tax Treaty between the Russian Federation and the beneficial owner’s country of residence. **In addition, this document must be certified with an apostille by the relevant authorities.**

The wording on this form must adhere to the following format:

“The <Tax Authority> here by confirms that <Name of Beneficial Owner> is/was a/an <entity type> in <Country of Residence> during the tax year 2013 in the sense of the DTT between the Russian Federation and the <Country of Residence>.”

NOTE FROM OAO TMK

Provision by the beneficial holder of the DSs of documents and information described in this notice shall not be viewed as the guarantee of the application by the company for reduced Russian withholding tax rates. In particular, in case the documents and information provided by the beneficial holder of the DSs contain any mistakes or inaccuracies or do not comply with certain requirements or if the documents and information are not provided in full before the agreed deadline the Company reserves the right to withhold Russian withholding income tax at the standard rate of 15% as envisaged by the Russian tax legislation. However, when making the decision regarding the application of tax rate, the Company will take into consideration interests of the beneficial holders of the DSs.

DESCRIPTION OF VARIOUS DOCUMENTATION			
DOCUMENT NAME	DESCRIPTION	ORIGINAL / COPY	SIGNATURE REQUIREMENT
DTC PARTICIPANT COVER LETTER (APPENDIX A)	LISTING OF BENEFICIAL OWNERS TOGETHER WITH THE KEY INFORMATION REQUIRED BY THE RUSSIAN TAX AUTHORITIES FOR RELIEF AT SOURCE.	ORIGINAL	DTC PARTICIPANT

CONFIRMATION LETTER³ (APPENDIX B)	CONFIRMATION OF BENEFICIAL OWNERSHIP OF THE DIVIDEND AND INDEMNIFICATION OF BNY MELLON AS AGENT AND TO ISSUER.	ORIGINAL MUST BE GENERALLY TRANSLATED INTO RUSSIAN	BENEFICIAL OWNER
CERTIFICATE OF AUTHORIZED PERSONS (IF APPLICABLE)	THE NAME OF THE SIGNATORY OF (APPENDIX A) MUST BE ON THIS LIST.	ORIGINAL MUST BE GENERALLY TRANSLATED INTO RUSSIAN	ALL AUTHORIZED SIGNATORIES OF THE BENEFICIAL OWNER
IRS FORM 6166** (U.S. CLIENTS ONLY)	ISSUED BY THE INTERNAL REVENUE SERVICE, STATING THE NAME ³ AND TAX PAYER IDENTIFICATION NUMBER OF THE BENEFICIAL OWNER. IT MUST BE DATED THE TAX YEAR OF THE DIVIDEND PAYMENT. “<Name of Beneficial Owner> is/was a resident in the United States of America during the year 2013 in the sense of the DTT between the Russian Federation and the United States of America.	ORIGINAL WITH APOSTILLE. ** OFFICIAL LEGAL TRANSLATION	IRS REPRESENTATIVE, APOSTILLE, OFFICIAL RUSSIAN TRANSLATOR AND RUSSIAN NOTARY.
CERTIFICATE OF RESIDENCY** (NON-U.S. CLIENTS ONLY)	A GENERAL DOCUMENT ISSUED BY THE BENEFICIAL OWNER'S LOCAL TAX OFFICE, ³ STATING THE NAME OF THE TAX PAYER ³ AND CERTIFYING THE RESIDENCY OF THE BENEFICIAL OWNER FOR THE YEAR OF THE DIVIDEND PAYMENT. “The <Tax Authority> here by confirms that <Name of Beneficial Owner> is/was a/an <entity type> in <Country of Residence> during the tax year 2013 in the sense of the DTT between the Russian Federation and the <Country of Residence>.”	ORIGINAL WITH APOSTILLE. ** OFFICIAL LEGAL TRANSLATION	LOCAL TAX AUTHORITY, APOSTILLE, OFFICIAL RUSSIAN TRANSLATOR AND RUSSIAN NOTARY.
ADDITIONAL REQUIRMENTS	BASED UPON PARTICULAR REQUIREMENTS BETWEEN COUNTRY OF RESIDENCE AND RUSSIAN FEDERATION. CONSULT THE TREATY OR TAX ADVISOR FOR ADDITIONAL DETAILS.	SEE TREATY	SEE TREATY

CONTACT DETAILS

PRIMARY CONTACT (EMAIL ADDESS)	LEANN MAURICE (LEANN_MAUURICE@GLOBETAX.COM)
DOMESTIC PHONE (U.S.) / FAX (U.S.)	1-800-915-3536 / 1-800-985-3536
INTERNATIONAL PHONE / FAX	1-212-747-9100 / 1-212-747-0029
COMPANY	BNY MELLON / GLOBETAX
STREET ADDESS	90 BROAD STREET, 16 TH FLOOR
CITY/STATE/ZIP	NEW YORK, NY 10004
ADDITIONAL CONTACTS	JENNY LIN, BRETT LEWIS

³ Due to formalistic approach of the Russian tax authorities we recommend you ensure that no abbreviations are used in the documents or alternatively both full and shortened names are mentioned in the document.

FREQUENTLY ASKED QUESTIONS (FAQs)

QUESTION	ANSWER
DO THE SHARES HAVE TO BE RE-REGISTERED?	NO.
WHICH RESIDENTS ARE CONSIDERED ELIGIBLE FOR RELIEF AT SOURCE?	PLEASE SEE ELIGIBILITY MATRIX ABOVE.
WHAT DO I HAVE TO DO TO RECEIVE THE 15% WITHHOLDING?	NO ACTION IS REQUIRED TO RECEIVE THE DIVIDEND AT THE STATUTORY RATE.
DO I NEED TO PHYSICALLY SEND ANY DOCUMENTS TO BNY MELLON / GLOBETAX IN ORDER TO PARTICIPATE IN THE RELIEF AT SOURCE PROCESS?	YES, AN ORIGINAL COVER LETTER, PROOF OF RESIDENCY, REGISTRATION CERTIFICATE, CONFIRMATION LETTER AND ANY ADDITIONAL TREATY SPECIFIC STIPULATIONS ARE REQUIRED IN ORDER TO PARTICIPATE IN THE RUSSIAN RELIEF AT SOURCE PROCESS.
HOW DO I OBTAIN A CERTIFICATION WITH AN APOSTILLE ON THE FORM 6166?	AT THE U.S. DEPARTMENT OF STATE, OFFICE OF AUTHENTICATIONS IN WASHINGTON, DC. FOR MORE INFORMATION: http://www.state.gov/m/a/auth/
WHEN CAN THE CLIENT EXPECT TO RECEIVE THE DIVIDEND PAYMENT TAXED AT THE BENEFICIAL DTT TAX RATE?	PAYMENT WILL BE MADE ON PAY DATE.
IS THERE A LONG FORM PROCESS IF THE DEADLINES ABOVE ARE MISSED?	PLEASE CONTACT BNY MELLON / GLOBETAX FOR DETAILS.
IS THE RELIEF-AT-SOURCE PROCESS FREE OF CHARGE?	NO. THIS TAX RELIEF AT SOURCE ASSISTANCE SERVICE IS WHOLLY VOLUNTARY AND DISCRETIONARY AND OUTSIDE THE TERMS AND CONDITIONS OF ANY APPLICABLE DEPOSIT AGREEMENT. FEES WILL BE CHARGED FOR THIS SERVICE OF UP TO \$0.005 PER DEPOSITARY SHARE WITH A MINIMUM OF \$1000 PER BENEFICIAL OWNER, AND ANY OTHER CHARGES, FEES OR EXPENSES PAYABLE BY OR DUE TO BNY MELLON OR ITS AGENTS, INCLUDING THE CUSTODIAN OR TO TAX AUTHORITIES OR REGULATORS . FEES PAID TO BNY MELLON MAY BE SHARED WITH ITS AGENTS.
DOES THE RELIEF AT SOURCE PROCESS HAVE A MINIMUM FEE PER BENEFICIAL OWNER?	THERE IS A MINIMUM FEE \$1,000.00 PER BENEFICIAL OWNER (500,000 DSs). THIS IS FOR DEPOSITARY HANDLING FEES AND LOCAL OUT-OF-POCKET EXPENSES. THIS FEE WILL BE DEDUCTED PRIOR TO PAYMENT OF FAVORABLE RATE DIVIDEND.

DISCLAIMER

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 (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.

APPENDIX A – CUSTODIAL COVER LETTER

THIS DOCUMENT MUST BE PREPARED ON THE DTC PARTICIPANT’S LETTERHEAD

DATE

GlobeTax as agent for BNY Mellon
90 Broad Street – 16th Floor
New York, NY 10004 – 2205
Attn: Depository Services – Russia

To Whom it May Concern:

Enclosed please find withholding tax relief at source documents which we have submitted on behalf of our client(s) who wish to receive tax relief at source at the appropriate treaty rate on Russian DSs. We, (DTC PARTICIPANT NAME), also identified as participant number (#####), hereby state that each beneficial owner cited below held the respective amount of DSs on the DS record date of May 21, 2013 for the security OAO TMK-144A (Cusip: 87260R102). Below is the list of beneficial owners and their holdings, which total (TOTAL NUMBER OF DSs CITED BELOW) DSs. Proof of Residency and Confirmation documents are enclosed for each beneficial owner. The ratio is 1 DS to 4 Ordinary Shares. The information is as follows:

We would like to apply for (TAX RATE) tax rate based on the following information:

Table with 6 columns: Name of Investor, Full Address, Tax ID, Country of Residence / Incorporation, Number of DSs held on the Record Date, Equivalent Number of Ordinary Shares.

We hereby agree that this tax reclaim assistance service is wholly voluntary and discretionary and outside the terms and conditions of any applicable deposit agreement. We hereby accept and agree to pay the fees of BNY Mellon of up to \$0.005 per Depository Share for Relief at Source (with a minimum of \$1000), and any other charges, fees or expenses payable by or due to BNY Mellon or its agents, including the (respective) custodian, in connection with the tax reclaim process, or to tax authorities or regulators (which fees, charges or expenses may be deducted from the dividend or any other distribution or by billing or otherwise in BNY Mellon’s discretion). We hereby agree that any such fees, charges or expenses may be due and payable whether or not a successful reduction in rate or reclamation is obtained. We hereby agree that fees paid to BNY Mellon may be shared with its Agents.

We hereby agree that in addition to statutory and documentation requirements and the deduction of fees, tax reclaim benefits will be subject to review and approval by the applicable custodian and the applicable tax regulators, and that BNY Mellon is not providing any legal, tax, accounting or other professional advice on these matters and has expressly disclaimed any liability whatsoever for any loss howsoever arising from or in reliance hereto. 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 DTC PARTICIPANT REPRESENTATIVE)

Name:
Title:

APPENDIX B – CONFIRMATION LETTER

**THIS DOCUMENT MUST BE PREPARED ON THE BENEFICIAL OWNER’S LETTERHEAD
PLEASE ATTACH CERTIFICATE OF AUTHORIZED PERSONS (IF APPLICABLE)**

DATE

Re: OAO TMK Dividend (record date: May 21, 2013)

In connection with the application for relief at source on dividend income <Beneficial Owner Name> hereby certifies that the securities for which it is entitled to receive cash dividends are beneficially owned by <Beneficial Owner Name> for its own account and not for the benefit of any other person or entity.

<Beneficial Owner Name> hereby certifies:

1. In 2013 <Beneficial Owner Name> did not carry out any activities via its permanent establishment or other place of business located in Russia, or
2. Dividends paid by the Company are not effectively connected with the permanent establishment or other place of business of the beneficial holder of the <Beneficial Owner Name> in Russia, and
3. <Beneficial Owner Name> is entitled to rely on provisions of the double tax treaty concluded between Russia and <Country of Tax Residence>, agreement < name of the double taxation treaty> and ratified on <date of agreement >*. The beneficial owner does not fall within the provisions limiting the application of benefits granted by such double tax treaty, and
4. <Beneficial Owner Name> is not a flow-through entity, agent, nominee, or tax transparent entity. <Beneficial Owner Name> has the full right to use and enjoy the dividend unconstrained by a contractual or legal obligation to pass the payment received to another person.”

<Beneficial Owner Name> agrees to indemnify and hold harmless each of BNY Mellon and its agents and their respective affiliates, directors, offices, agents and employees for any and all liabilities, losses, claims, costs, damages, penalties, fines, obligations, taxes or expenses of any kind whatsoever (including, without limitation, reasonable attorneys’, accountants’, consultants’ or experts’ fees and disbursements) incurred by any of them in connection with or arising out of or related to this application at source or dividend related payments received by or on behalf of <Beneficial Owner Name>.

**(FULL BENEFICIAL NAME AS IT APPEARS ON 6166 OR
CERTIFICATION OF RESIDENCY)**

By:

Name
Position
Phone Number

SIGNED & SEALED BY THE BENEFICIAL OWNER
POWER OF ATTORNEY REQUIRED AND / OR AUTHORIZED SIGNATORIES LIST
NOTARIZED RUSSIAN TRANSLATION

* For your reference, a select list of treaty countries, name of treaty, and date of agreement is appended on the last page.

INDICATIVE LIST OF DOUBLE TAX TREATIES					
Country	Treaty benefits available from	Dividends(%)	Country	Treaty benefits available from	Dividends(%)
Albania/RF	1-Jan-98	10	Macedonia/RF	1-Jan-01	10
Algeria/RF	1-Jan-09	5 or 15	Malaysia/USSR	1-Jan-89	15
Armenia/RF	1-Jan-99	5 or 10	Mali/RF	1-Jan-00	10 or 15
Australia/RF	1-Jan-04	5 or 15	Mexico/RF	1-Jan-09	10
Austria/RF	1-Jan-03	5 or 15	Moldova/RF	1-Jan-98	10
Azerbaijan/RF	1-Jan-99	10	Mongolia/RF	1-Jan-98	10
Belarus/RF	1-Jan-98	15	Montenegro/RF	1-Jan-98	5 or 15
Belgium/RF	1-Jan-01	10	Morocco/RF	1-Jan-00	5 or 10
Brazil	1-Jan-10	10 or 15	Namibia/RF	1-Jan-01	5 or 10
Bulgaria/RF	1-Jan-96	15	Netherlands/RF	1-Jan-99	5 or 15
Canada/RF	1-Jan-98	10 or 15	New Zealand/RF	1-Jan-04	15
China/RF	1-Jan-98	10	Norway/RF	1-Jan-03	10
Croatia/RF	1-Jan-98	5 or 10	Philippines/RF	1-Jan-98	15
Cuba	1-Jan-11	5 or 15	Poland/RF	1-Jan-94	10
Cyprus/RF	1-Jan-00	5 or 10	Portugal/RF	1-Jan-03	10 or 15
Czech/RF	1-Jan-98	10	Qatar/RF	1-Jan-01	5
Denmark/RF	1-Jan-98	10	Romania/RF	1-Jan-96	15
Egypt	1-Jan-01	10	Saudi Arabia	1-Jan-11	5
Finland/RF	1-Jan-03	5 or 12	Serbia/RF	1-Jan-98	5 or 15
France/RF	1-Jan-00	5 or 10 or 15	Singapore/RF	1-Jan-09	5 or 10
Germany/RF	1-Jan-97	5 or 15	Slovakia/RF	1-Jan-98	10
Greece/RF	1-Jan-08	5 or 10	Slovenia/RF	1-Jan-98	10
Hungary/RF	1-Jan-98	10	South Africa/RF	1-Jan-01	10 or 15
Iceland/RF	1-Jan-04	5 or 15	Spain/RF	1-Jan-01	5 or 10 or 15
India/RF	1-Jan-99	10	Sri Lanka/RF	1-Jan-03	10 or 15
Indonesia/RF	1-Jan-03	15	Sweden/RF	1-Jan-96	5 or 15
Iran/RF	1-Jan-03	5 or 10	Switzerland/RF	1-Jan-98	5 or 15
Ireland/RF	1-Jan-96	10	Syria/RF	1-Jan-04	15
Israel/RF	1-Jan-01	10	Tajikistan/RF	1-Jan-04	5 or 10
Italy/RF	1-Jan-99	5 or 10	Thailand/RF	1-Jan-09	15
Japan/USSR	1-Jan-87	15	Turkey/RF	1-Jan-00	10
Kazakhstan/RF	1-Jan-98	10	Turkmenistan/RF	1-Jan-00	10
Korea, Democratic People's Rep/RF	1-Jan-01	10	Ukraine/RF	1-Jan-00	5 or 15
Korea, Rep./RF	1-Jan-96	5 or 10	United Kingdom/RF	1-Jan-98	10
Kuwait/RF	1-Jan-04	0 or 5	USA/RF	1-Jan-94	5 or 10
Kyrgyzstan/RF	1-Jan-01	10	Uzbekistan/RF	1-Jan-96	10
Lebanon/RF	1-Jan-01	10	Venezuela	1-Jan-10	10 or 15
Lithuania/RF	1-Jan-06	5 or 10	Vietnam/RF	1-Jan-97	10 or 15
Luxembourg/RF	1-Jan-98	10 or 15			

In cases of multiple tax rates, the lower rate typically refers to a minimum of 10% (or 25%) of outstanding shares, please contact your tax advisor or GlobeTax for specific details

Select List of DTT Countries and Treaty Dates for Appendix B			
COR	Name of the Double Tax Treaty	Signed On	Article Number (Paragraph)
Belgium	1995 Income and Capital Tax Treaty	16-Jun-95	Article 10 Paragraph 2
China	1994 China (People's Rep.) - Russia Income Tax Treaty	27-May-94	Article 9 Paragraph 2
Denmark	1996 Denmark-Russia Income and Capital Tax Treaty	8-Feb-96	Article 10 Paragraph 2
Finland	1996 Finland-Russia Income Tax Treaty	4-May-96	Article 10 Paragraph 1b
Hungary	1994 Hungary-Russia Income and Capital Tax Treaty	3-Nov-97	Article 10 Paragraph 2
Ireland	1994 Ireland-Russia Income Tax Treaty	29-Apr-94	Article 10 Paragraph 2
Italy	1996 Italy-Russia Income and Capital Tax Treaty	9-Apr-96	Article 10 Paragraph 2b
Korea, Republic of (South)	1992 Korea (Rep.)-Russia Income Tax Treaty	19-Nov-92	Article 10 Paragraph 2b
Norway	1996 Russia Income and Capital Tax Treaty	26-Mar-96	Article 10 Paragraph 2
United Kingdom	1994 Russia-United Kingdom Income Tax Treaty	15-Feb-94	Article 10 Paragraph 2
United States of America	1992 United States Income and Capital Tax Treaty	17-Jun-92	Article 10 Paragraph 2b