



*Important Notice*  
The Depository Trust Company

<b>B #:</b>	0989-13
<b>Date:</b>	June 25, 2013
<b>To:</b>	All Participants
<b>Category:</b>	Dividends
<b>From:</b>	International Services
<b>Attention:</b>	Operations, Reorg & Dividend Managers, Partners & Cashiers
<b>Subject:</b>	<b><u>Tax Relief</u></b> – Country: Russia Rushydro CUSIP: 466294105 <b><u>Record Date:</u> 05/23/2013 <u>Payable Date:</u> TBA</b> <b><u>EDS Cut-Off:</u> 07/19/2013 8:00 P.M. (EST)</b>

**Revised**

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.

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# REVISED: MINIMUM FEE AND CERTIFICATE OF RESIDENCY TRANSLATION



**RusHydro (Cusip# 466294105)** has recently announced a dividend. BNY Mellon acts as Depository (the "Depository") for the company's American Depositary Share ("DS") program.

Russian withholding tax may be reduced or eliminated in accordance with the provisions of an applicable double taxation treaty ("DTT"). The Depository 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).

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

Under certain tax conventions, residents of territories that have signed a DTT with the Russian Federation may be entitled to a reduced tax treaty rate of 0%<sup>1</sup>, 5%, 10%, or 12% rather than the Russian statutory withholding tax rate of 15%.

The Depository 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 Depository 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 tax relief 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 Depository 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.

## DIVIDEND EVENT DETAILS

COUNTRY OF ISSUANCE	RUSSIAN FEDERATION
ISSUE	RUSHYDRO
CUSIP#	466294105
DEPOSITARY	BNY MELLON
DEPOSITARY SHARE RECORD DATE	MAY 23, 2013
DEPOSITARY SHARE PAY DATE	<b>TBA</b>
DEPOSITARY SHARE GROSS DIVIDEND RATE ON PAY DATE	<b>\$ TBA</b>
ORD GROSS DIVIDEND RATE ON PAY DATE	RUB 0.00955606
RATIO	100 ORDS : 1 DS
STATUTORY WHT RATE	15%

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

<b>CHARGES &amp; DEADLINES</b>				
<b>FILING METHOD</b>	<b>BATCH</b>	<b>PAYMENT METHOD</b>	<b>TAX RELIEF PROCESSING FEE</b>	<b>FINAL SUPPORTING DOCUMENT SUBMISSION DEADLINE (ALL TIMES EST)</b>
<b>RELIEF AT SOURCE</b>	PAYMENT ON PAY DATE	VIA DTC	UP TO \$0.005 PER DEPOSITARY SHARE, MAXIMUM 40% OF RECOVERY AMOUNT – MINIMUM OF \$1000.00 USD.	<b>July 19, 2013 8pm</b>

<b>TAX RELIEF ELIGIBILITY MATRIX</b>			
<b>RATE DESCRIPTION</b>	<b>ELIGIBLE RESIDENTS</b>	<b>DOCUMENTATION REQUIRED</b>	<b>FINAL DOCUMENT SUBMISSION DEADLINE (ALL TIMES EST)</b>
<b>UNFAVORABLE - 15%</b>	RUSSIA, AND ALL COUNTRIES NOT LISTED ON LIST OF DOUBLE TAX TREATIES	NO DOCUMENTATION REQUIRED	N/A
<b>FAVORABLE – 0%, 5%, 10% or 12% TAX TREATY*</b>	SEE ATTACHMENT FOR INDICATIVE LIST OF DOUBLE TAX TREATIES	1) CERTIFICATE OF RESIDENCY 2) DTC PARTICIPANT COVER LETTER (APPENDIX A)	on or before <b>July 19, 2013 8pm</b>
<b>FAVORABLE - 10% TAX TREATY</b>	UNITED STATES OF AMERICA	1) IRS FORM 6166 2) DTC PARTICIPANT COVER LETTER (APPENDIX A)	on or before <b>July 19, 2013 8pm</b>
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.			

### **Certification of Residency**

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

\*\*The certificates must be certified for the year 2012 as this was the year the proceeds being paid were earned\*\*

**\*\*UPDATE: BNY Mellon will translate apostilled Form 6166 and Certification of Residency as part of the \$1,000 minimum fee per beneficial owner\*\***

**For residents of the United States:** An original U.S. IRS Form 6166 for Tax Year 2012, 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 2012 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 2012 in the sense of the DTT between the Russian Federation and the <Country of Residence>."

## DESCRIPTION OF VARIOUS DOCUMENTATION

DOCUMENT NAME	DESCRIPTION	ORIGINAL / COPY	SIGNATURE REQUIREMENT
<b>DTC PARTICIPANT COVER LETTER</b> (APPENDIX A)	LISTING OF BENEFICIAL OWNERS TOGETHER WITH THE KEY INFORMATION REQUIRED BY THE RUSSIAN TAX AUTHORITIES FOR RELIEF AT SOURCE.	ORIGINAL	DTC PARTICIPANT
<b>IRS FORM 6166**</b> (U.S. CLIENTS ONLY)	ISSUED BY THE INTERNAL REVENUE SERVICE, STATING THE NAME <sup>2</sup> 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 2012 in the sense of the DTT between the Russian Federation and the United States of America.	ORIGINAL WITH APOSTILLE.	IRS REPRESENTATIVE, APOSTILLE, AND OFFICIAL RUSSIAN TRANSLATOR.  (UPDATE: BNY Mellon will translate apostilled Form 6166 and Certification of Residency as part of the \$1,000 minimum fee per beneficial owner)
<b>CERTIFICATE OF RESIDENCY**</b> (NON-U.S. CLIENTS ONLY)	A GENERAL DOCUMENT ISSUED BY THE BENEFICIAL OWNER'S LOCAL TAX OFFICE, STATING THE NAME OF THE TAX PAYER <sup>2</sup> 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 2012 in the sense of the DTT between the Russian Federation and the <Country of Residence>.”	ORIGINAL WITH APOSTILLE.	LOCAL TAX AUTHORITY, APOSTILLE, AND OFFICIAL RUSSIAN TRANSLATOR.  (UPDATE: BNY Mellon will translate apostilled Form 6166 and Certification of Residency as part of the \$1,000 minimum fee per beneficial owner)
<b>ADDITIONAL REQUIREMENTS</b>	BASED UPON PARTICULAR REQUIREMENTS BETWEEN COUNTRY OF RESIDENCE AND RUSSIAN FEDERATION. CONSULT THE TREATY OR TAX ADVISOR FOR ADDITIONAL DETAILS.	SEE TREATY	SEE TREATY

<sup>2</sup> 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.

## CONTACT DETAILS

PRIMARY CONTACT (EMAIL ADDRESS)	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 ADDRESS	90 BROAD STREET, 16 <sup>TH</sup> FLOOR
CITY/STATE/ZIP	NEW YORK, NY 10004
ADDITIONAL CONTACTS	JENNY LIN, BRETT LEWIS

## 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: <a href="http://www.state.gov/m/a/auth/">http://www.state.gov/m/a/auth/</a>
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 GLOBETAX AS AGENT FOR BNY MELLON 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 \$1000.00 PER BENEFICIAL OWNER (200,000 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.

APPENDIX A – CUSTODIAL COVER LETTER

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

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DATE

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

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 23, 2013** for the security **RusHydro (Cusip:466294105)**. 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 **100** Ordinary Shares. The information is as follows:

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

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:

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