

B#:	1081-13
Date:	June 28, 2013
To:	All Participants
Category:	Dividends
From:	International Services
Attention:	Operations, Reorg & Dividend Managers, Partners & Cashiers
Subject:	Tax Relief – Country: France Security: PERNOD-RICARD SA CUSIP: 714264207 Record Date: 07/01/2013 Payable Date: 07/26/2013 EDS Cut-Off: 07/09/2013 8:00 P.M. (EST)

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.

Please Note Documentation Cut-Off at GlobeTax is August 05th, 2013 by 5:00 P.M. EST

Questions regarding this Important Notice may be directed to GlobeTax at 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.



PERNOD-RICARD SA has announced a cash dividend.

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. Use of EDS will permit entitlement amounts to be paid through DTC.

On Depositary Share Pay Date, all eligible U.S. and Canadian holders will have the opportunity to receive their full treaty benefits as outlined in the "Relief at Source ("EDS") Eligibility Matrix". All holders not eligible for EDS or not certified at the favorable or exempt withholding tax rates through EDS will receive the dividend net of the full French statutory withholding tax rate of 30% with the possibility to reclaim through the standard long form process.

DIVIDEND EVENT DETAILS		
COUNTRY OF ISSUANCE	FRANCE	
ISSUE	PERNOD-RICARD SA	
CUSIP#	714264207	
DEPOSITARY	UNSPONSORED	
DEPOSITARY SHARE RECORD DATE	July 1, 2013	
DEPOSITARY SHARE PAY DATE	July 26, 2013	
ORD PAY DATE	July 5, 2013	
ORD GROSS DIVIDEND RATE	€ 0.79	
RATIO	1 ORD : 5 DSs	
STATUTORY WHT RATE	30%	

CHARGES & DEADLINES				
FILING METHOD	PAYMENT METHOD	TAX RELIEF FEE	MINIMUM FEE PER BENEFICIAL OWNER	FINAL SUBMISSION DEADLINE (ALL TIMES EST)
RELIEF AT SOURCE	EDS	Up to \$0.0075 per Depositary Share ("DS")	\$0	EDS DEADLINE: July 9, 2013; 8:00 P.M. DOCUMENTATION DEADLINE AT GLOBETAX: August 5, 2013; 5:00 P.M.
STANDARD LONG FORM PROCESS	CHECK	Up to: \$0.01 per Depositary Share ("DS")	\$25 Tax Relief Fee & up to 50 EUR Custodial Fee	FINAL DEADLINE: November 1, 2015 RECLAIMS RECEIVED POST DEADLINE CANNOT BE ASSURED AND MAY BE SUBJECT TO A 1,000.00 EUR PER BENEFICIARY CUSTODIAL FEE WHETHER OR NOT SUCCESSFUL.

Agreements, Representations and Indemnification

We hereby agree that this tax relief 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, Citibank N.A., Deutsche Bank Trust Company Americas, and J.P Morgan Chase of up to \$0.0075 per Depositary Share for Relief at Source or up to \$0.01 per Depositary Share for the Long Form and any other charges, fees or expenses payable by or due to BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, and J.P Morgan Chase or its agents, including any 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, Citibank N.A.'s, Deutsche Bank Trust Company Americas', And J.P Morgan Chase'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, Citibank N.A., Deutsche Bank Trust Company Americas, And J.P Morgan Chase may be shared with its agents.

We hereby agree that in addition to statutory and documentation requirements, and the deduction of fees, tax relief benefits will be subject to review and approval by the applicable custodian and tax regulators, and that BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, And J.P Morgan Chase 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, Citibank N.A., Deutsche Bank Trust Company Americas, and J.P Morgan Chase shall not be liable for the failure to secure any refund. In consideration of the assistance of BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, and J.P Morgan Chase and the custodian in processing such claims, we expressly agree that BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, and J.P Morgan Chase and its agents or affiliates shall not have any liability for, and we shall indemnify, defend and hold each of BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, and J.P Morgan Chase 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.

RELIEF AT SOURCE ("EDS") ELIGIBILITY MATRIX- ALL				
RATE DESCRIPTION	RECLAIM RATE	ELIGIBLE RESIDENTS	DOCUMENTATION REQUIRED	
UNFAVORABLE - 30%	0%	NON-TREATY COUNTRIES AND ENTITIES NOT MENTIONED AS FAVORABLE OR EXEMPT BELOW	NONE	
FAVORABLE - 15%	15%	 U.S. INDIVIDUALS/IRAs (EXCLUDING ROTH, ROLLOVER, & SEP IRAs) U.S. CORPORATIONS U.S. REGULATED INVESMENT COMPANIES (RICs), REAL ESTATE INVESTMENT TRUSTS (REITs), REAL ESTATE MORTGAGE INVESTMENT CONDUITS (REMICs) U.S. PENSION FUNDS (QUALIFIED UNDER SECTIONS 401(a), 401(b), 403(b), & 457 ONLY) U.S. NOT-FOR-PROFIT ORGANIZATIONS (QUALIFIED UNDER SECTION 501(c)3 ONLY) 	 APPENDIX B.1 APPENDIX F APPENDIX B.2* IRS FORM 6166 APPENDIX C1 OR C2 	
FAVORABLE - 15%	15%	CANADIAN INDIVIDUALSCANADIAN CORPORATIONS	 APPENDIX B.1 APPENDIX F APPENDIX B.2* APPENDIX D1 OR D2 5000-EN FORM 	
EXEMPT - 0%	30%	• CANADIAN PENSIONS	 APPENDIX B.1 APPENDIX F APPENDIX B.3* APPENDIX D1 OR D2 APPENDIX E1 OR E2 5000-EN FORM 	

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.

REQUIREMENTS FOR RELIEF AT SOURCE ELECTIONS		
CATEGORY	DESCRIPTION / CLARIFICATION	
U.S. INDIVIDUALS/IRAs (ROTH , ROLLOVER & SEP IRAs EXCLUDED)	 AN IRS 6166 FORM IS <u>NOT</u> REQUIRED, HOWEVER, THE FRENCH TAX AUTHORITIES RESERVE THE RIGHT TO REQUEST ONE 	
U.S. CORPORATIONS	- AN IRS 6166 FORM IS <u>NOT</u> REQUIRED, HOWEVER, THE FRENCH TAX AUTHORITIES RESERVE THE RIGHT TO REQUEST ONE	
U.S. REGULATED INVESMENT COMPANIES (RICs), REAL ESTATE INVESTMENT TRUSTS (REITs), REAL ESTATE MORTGAGE INVESTMENT CONDUITS (REMICs)	- AN IRS 6166 FORM IS REQUIRED AND SHOULD BE DATED THE YEAR OF THE DIVIDEND PAYMENT	
U.S. PENSION FUNDS	- AN IRS 6166 FORM IS REQUIRED AND <u>MUST</u> STATE ANY OF THE FOLLOWING IRS SECTIONS UNDER THE U.S. FEDERAL TAX CODE: 401(a) , 401(b) , 403(b) , 457	
U.S. NOT-FOR-PROFIT ORGANIZATIONS	 AN IRS 6166 FORM IS REQUIRED AND <u>MUST</u> INDICATE SECTION 501(c)3 OF THE U.S. FEDERAL TAX CODE; IF THE IRS 6166 FORM REFERS TO 501(c); A <u>TREASURY DETERMINATION LETTER</u> CLEARLY MENTIONING 501(c)3 NEEDS TO BE SUPPLIED WITH THE IRS 6166 FORM 	

DESCRIPTION OF VARIOUS DOCUMENTATION (RELIEF AT SOURCE)				
DOCUMENT NAME	DESCRIPTION	ORIGINAL / COPY	SIGNATURE REQUIREMENT	
APPENDIX B.1	DTC PARTICPANT INFORMATION	ORIGINAL	NONE	
APPENDIX B.2	- SUMMARY OF ALL ENTITY TYPES ELECTED	ORIGINAL	NONE	
APPENDIX B.3	- SUMMARY OF ALL CANADIAN PENSIONS ELECTED	ORIGINAL	NONE	
IRS FORM 6166***	- ISSUED BY THE INTERNAL REVENUE SERVICE, STATING THE NAME AND TAX PAYER IDENTIFICATION NUMBER OF THE BENEFICIAL OWNER	ORIGINAL	IRS REPRESENTATIVE	
APPENDIX C1 OR C2 (ANNEX III)	 SIGNATURE AND STAMP (MEDALLION OR OTHER) OF THE DTC PARTICIPANT APPENDIX C1 PREFERRED 	ORIGINAL	DTC PARTICIPANT	
APPENDIX D1 OR D2 (ANNEX IV)	 SIGNATURE AND STAMP (MEDALLION OR OTHER) OF THE DTC PARTICIPANT APPENDIX D1 PREFERRED 	ORIGINAL	DTC PARTICIPANT	
APPENDIX E1 OR E2 (ANNEX I OR II)	 AN ATTESTATION MUST BE FILLED FOR <u>EACH</u> BENEFICIARY MUST BE CERTIFIED BY REVENUE CANADA APPENDIX E1 PREFERRED 	ORIGINAL	BENEFICIARY OR LEGAL REPRESENTATIVE & CANADIAN TAX AUTHORITY	
5000-EN FORM	- SUBMIT THE "FOR USE BY THE FRENCH TAX AUTHORITY" VERSION ONLY; INDICATED IN UPPER LEFT HAND CORNER OF THE FORM - SECTION III O DATE, SIGNATURE & STAMP (MEDALLION OR OTHER) OF THE DTC PARTICIPANT - SECTION IV O TO BE CERTIFIED BY REVENUE CANADA - THE FORM CAN BE OBTAINED BELOW: http://www.impots.gouv.fr/portal/deploiement/p1/fichedescriptiveformulaire _3547/fichedescriptiveformulaire_3547.pdf	ORIGINAL	DTC PARTICIPANT & CANADIAN TAX AUTHORITY	
APPENDIX F	 AN ASCII (AMERICAN STANDARD CODE FOR INFORMATION INTERCHANGE) <u>COMPUTER DISK FILE</u> OR A <u>MICROSOFT EXCEL FILE</u> IS REQUIRED EXHIBIT I LISTS THE FORMATTING RULES 	ORIGINAL	NONE	

^{***} It is highly recommended to provide an original Form 6166 where the "Tax Year" matches the year of the dividend payment on the French shares. If you do not provide an original current year 6166 you may be requested to supply this document and if you are unable to do so you may be charged back to the unfavorable withholding tax rate by the French Custodian.

DEPOSITARY CONTACT DETAILS		
PRIMARY CONTACT	ROMAN SLUDNOV	
DOMESTIC PHONE (U.S.)	1-212-747-9100	
DOMESTIC FAX (U.S.)	1-212-747-0029	
INTERNATIONAL PHONE	1-212-747-9100	
INTERNATIONAL FAX	1-212-747-0029	
EMAIL ADDRESS	ROMAN_SLUDNOV@GLOBETAX.COM	
COMPANY	GLOBETAX	
STREET ADDRESS	90 BROAD STREET, 16 TH FLOOR	
CITY/STATE/ZIP	NEW YORK, NY 10004	
ADDITIONAL CONTACTS	GREGGORY LEWIS	



BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, and J.P. Morgan Chase offer 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 GlobeTax and creates applicable documentation on the Participants behalf.

Submit the data online through the web site below, print out the documents on letterhead, sign them, and mail them to GlobeTax, 90 Broad Street, 16th Floor, New York, NY 10004 USA, Attn: Roman Sludnov, along with the necessary required documents.

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

https://www.globetaxesp.com

Please contact Roman Sludnov at 1-212-747-9100 or via email at Roman_Sludnov@Globetax.com if you have any questions about this process.

FREQUENTLY ASKED QUESTIONS (FAQs)		
RELIEF AT SOURCE QUESTIONS		
QUESTION	ANSWER	
WHO DO I SEND THE RELIEF AT SOURCE DOCUMENTATION TO?	EVERYTHING IS TO BE SUBMITTED TO GLOBETAX	
DOES ANYTHING NEED TO BE SENT TO THE DEPOSITARY BANKS?	YES. EVERYTHING IS TO BE SUBMITTED TO THE DEPOSITARY BANK'S AGENT GLOBETAX.	
DOES THE IRS 6166 FORM HAVE TO BE FOR THE TAX YEAR IN WHICH THE DIVIDEND IS PAID OUT AND MUST IT BE ORIGINAL?	IT IS HIGHLY RECOMMENDED THAT THE TAX YEAR ON THE 6166 SUPPLIED MATCHES THE YEAR OF THE DIVIDEND PAYMENT AND THAT THE 6166 SUPPLIED IS AN ORIGINAL. IF YOU CHOOSE TO SUBMIT OUTDATED OR COPIES OF 6166s IT IS RECOMMENDED THAT YOU REQUEST A MORE CURRENT ONE FROM THE I.R.S. AT THE TIME THE ELECTION IS MADE AND SUBMIT IT TO THE FRENCH CUSTODIAN UPON RECEIPT.	
ARE CANADIAN MUTUAL FUNDS ELIGIBLE FOR RECLAIM THROUGH THE RELIEF AT SOURCE PROCESS?	NO. ONLY THROUGH THE STANDARD LONG FORM PROCESS.	
ARE PARTNERSHIPS ELIGIBLE FOR RECLAIM THROUGH THE RELIEF AT SOURCE PROCESS?	NO. ONLY THROUGH THE STANDARD LONG FORM PROCESS.	
WHY WOULD THE FRENCH TAX AUTHORITIES REQUEST AN IRS 6166 FORM FOR INDIVIDUALS OR CORPORATIONS IF IT IS NOT REQUIRED?	IF THEY HAVE ANY DOUBTS REGARDING THE STATUS OF THE BENEFICIAL OWNER, THEY ARE ENTITLED TO VALIDATE THEIR SUSPICION BY REQUESTING THE 6166.	
HOW LONG DOES IT TAKE TO RECEIVE PAYMENT WITH THE RELIEF AT SOURCE PROCESS?	ON DS PAY DATE.	

WHAT HAPPENS IF I DID NOT SUBMIT AN ELECTRONIC FILE?	YOUR FILING WILL BE REJECTED AND RESULT IN A CHARGEBACK WHICH WILL BE POSTED TO YOUR DTC PARTICIPANT ACCOUNT.
ARE U.S. TRUST ACCOUNTS ELIGIBLE FOR THE RELIEF AT SOURCE PROCESS?	DUE TO THE VARYING NATURE OF TRUST ACCOUNTS (SOME BEING TREATED AS INDIVIDUALS, OTHERS AS CORPORATIONS) IT IS NOT RECOMMENDED TO ELECT THESE ENTITIES AT ANY RATE OTHER THAN THE UNFAVORABLE RATE.
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 \$0.0075 PER DEPOSITARY SHARE WITH NO MINIMUM, AND ANY OTHER CHARGES, FEES OR EXPENSES PAYABLE BY OR DUE TO BNY MELLON, CITIBANK N.A., DEUSTCHE BANK TRUST COMPANY AMERICAS, AND J.P MORGAN CHASE OR ITS AGENTS, INCLUDING THE CUSTODIAN OR TO TAX AUTHORITIES OR REGULATORS. FEES PAID TO BNY MELLON, CITIBANK N.A., DEUSTCHE BANK TRUST COMPANY AMERICAS, AND J.P MORGAN CHASE MAY BE SHARED WITH ITS AGENTS.

FREQUENTLY ASKED QUESTIONS (FAQs)		
GENERAL QUESTIONS		
QUESTION	ANSWER	
HOW LONG DO BENEFICIAL OWNERS HAVE TO FILE FOR RECLAIM ON THIS DIVIDEND?	GENERALLY, TWO YEARS FROM THE END OF THE YEAR IN WHICH THE DIVIDEND WAS PAID, HOWEVER IT MAY DEPEND ON THE RESIDENCY OF THE BENEFICIAL OWNER.	
WHAT HAPPENS IF I DO NOT SEND IN THE DOCUMENTATION AND/OR SUBMIT A FILE WHOSE SHARE POSITION TOTALS MORE THAN MY EDS ELECTIONS?	THIS WILL RESULT IN A CHARGEBACK FOR THE AMOUNT OF SHARES NOT SUPPORTED BY THE DOCUMENTATION. THE FAVORABLE OR EXEMPT SHARES ELECTED WILL BE ADJUSTED TO YOUR UNFAVORABLE POSITION AND RESULT IN A DEBIT TO YOUR DTC PARTICIPANT ACCOUNT. SUBMITTING SHARE AMOUNTS EXCEEDING THE EDS ELECTIONS WILL RESULT IN A CHARGEBACK OF THE TOTAL POSITION.	
IS THERE ANY WAY TO RECLAIM THE FUNDS I WAS CHARGED BACK FOR?	YES. THE STANDARD LONG FORM PROCESS. PLEASE REFER TO THE BNY MELLON CONTACT DETAILS SECTION OF THIS NOTICE FOR ASSISTANCE.	
IS THIS DIVIDEND AVAILABLE ON ESP POWERED BY GLOBETAX?	YES, ALL REQUIRED DOCUMENTS CAN BE CREATED USING ESP POWERED BY GLOBETAX BUT THEY MUST STILL BE FORWARDED TO GLOBETAX.	
WILL GLOBETAX ACCEPT CLAIMS FILED DIRECTLY TO THEM BY BENEFICIAL OWNERS?	GLOBETAX 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.	

IS THE PROCESS FOR TAX RELIEF OFFERED BY THE ADR DEPOSITARY BANKS AN OPTIONAL PROCESS?

YES, THIS IS A DISCRETIONARY, OPTIONAL SERVICE, HOWEVER, IN THE FRENCH MARKET; THE CUSTODIANS WILL NOT ACCEPT CLAIMS FROM ANYONE EXCEPT THE DS DEPOSITARY BANKS IN ORDER TO ENSURE VALIDATION OF THE RECORD DATE POSITIONS CLAIMED. CLAIMS SUCH AS CLAIMS FILED UNDER A EUROPEAN COURT OF JUSTICE ("ECJ") RULING MAY BE FILED DIRECTLY TO THE FRENCH TAX AUTHORITIES WITH A PROPER 2777 FORM ISSUED BY THE FRENCH CUSTODIAN TO BNY MELLON, CITIBANK N.A., DEUSTCHE BANK TRUST COMPANY AMERICAS, AND J.P MORGAN CHASE, THESE FORMS ALSO MUST BE SECURED BY BNY MELLON, CITIBANK N.A., DEUSTCHE BANK TRUST COMPANY AMERICAS, AND J.P MORGAN CHASE AND ARE SUBJECT TO A FEE OF UP TO \$0.01 PER DEPOSTARY SHARE WITH A MINIMUM FEE OF \$25 AND A CUSTODIAL FEE OF UP TO 50 EUR.

IS THIS LONG FORM PROCESS FREE OF CHARGE?

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 \$0.01 PER DEPOSITARY SHARE WITH A MINIMUM OF \$25.00 AND A CUSTODIAL CHARGE UP TO 50 EUROS. RECLAIMS RECEIVED POST DEADLINE CANNOT BE ASSURED AND MAY BE SUBJECT TO A 1,000 EUR PER BENEFICIARY CUSTODIAL FEE AND ANY OTHER CHARGES, FEES OR EXPENSES PAYABLE BY OR DUE TO BNY MELLON, CITIBANK N.A., DEUSTCHE BANK TRUST COMPANY AMERICAS, AND J.P. MORGAN CHASE OR ITS AGENTS, INCLUDING THE CUSTODIAN OR AUTHORITIES. IN ADDITION, CHARGES MAY APPLY TO ANY LONG FORM CLAIMS REJECTED OR NOT ACCEPTED BY THE CUSTODIAN. FEES PAID TO BNY MELLON, CITIBANK N.A., DEUSTCHE BANK TRUST COMPANY AMERICAS, AND J.P. MORGAN CHASE MAY BE SHARED WITH ITS AGENTS.

FREQUENTLY ASKED QUESTIONS (FAQs)

STANDARD LONG FORM PROCESS QUESTIONS

QUESTION	ANSWER
WHERE CAN I OBTAIN INFORMATION ON THE STANDARD LONG FORM PROCESS?	BNY MELLON, CITIBANK N.A., DEUSTCHE BANK TRUST COMPANY AMERICAS, AND J.P MORGAN CHASE ADMINISTERS THE LONG FORM PROCESS. PLEASE REFER TO THE DEPOSITARY CONTACT DETAILS SECTION OF THIS NOTICE FOR ASSISTANCE.
WHEN DO I NEED TO USE EXHIBIT II (COVER LETTER) AT THE END OF THIS NOTICE?	ONLY FOR THE STANDARD LONG FORM PROCESS
HOW LONG DOES IT TAKE TO RECEIVE PAYMENT ON STANDARD LONG FORM PROCESS?	GENERALLY 6 MONTHS TO 1 YEAR

Warning and Disclaimer:

BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, and J.P Morgan Chase 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, Citibank N.A., Deutsche Bank Trust Company Americas, and J.P Morgan Chase 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, Citibank N.A., Deutsche Bank Trust Company Americas, and J.P Morgan Chase 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 relief. Neither BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, and J.P Morgan Chase 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 B.1 – Format For Broker Details

First Page of Each List: (Bilingual Document French/English)

To be completed by DTC participant:

IDENTITE ET DRESSE COMPLETE ET NUMERO DE MEMBRE DE DTC DE L'ETABLISSEMENT QUI GERE LE

COMPTE-TITRES A L'ETRANGER:

Name of DTC participant:

Address of DTC participant:

DTC participant Number:

NOM. NUMERO DE TELEPHONE ET NUMERO DE TELECOPIEUR D'UN EMPLOYE DE L'ETABLISSEMENT

MEMBRE DE DTC:

Name of DTC participant's Employee:

Telephone number:

Telecopier number:

<u>To be Supplied by DR BNYMELLON Bank:</u>
IDENTITE DE LA SOCIETE DISTRIBUTRICE FRANCAISE: **PERNOD-RICARD SA**

Name of the French company paying the dividend: **PERNOD-RICARD SA**

NATURE DES TITRES DETENUS: AP= actions au porteur, AN= actions nominatives: AP

Type of share held: AP= bearer shares, AN= registered shares: AP

RATIO DU NOMBRE D'DRS PAR RAPPORT AU NOMBRE D'ACTIONS: 5:1

The ratio of the DRs to the ordinary shares: 5:1

DATE DE MISE EN PAIEMENT: 5, July 2013

Payment date of the dividend: 5, July 2013

VALEUR UNITAIRE DU COUPON:

Dividend amount per ordinary share in EURO (100%): 0.7900

Dividend amount per ordinary share after 15% withholding in EURO: 0.6715 Amount of the 15% withholding tax per ordinary share in EURO: 0.1580

<u>Appendix B.2 – Summary Page for all entity types other than Canadian Pension Funds</u> (One should be submitted for each entity type)

This summary page template should be used for all entity types with the exception of Canadian Pension Funds.

At the End of Each List, a **summary page** with French and English captions showing:

Name of French Issuer: PERNOD-RICARD SA Ordinary Payment Date: 5, July 2013
DTC participant Name & Number: Page No.

NOMBRE D'ACTIONNAIRES CONCERNES:

Number of beneficial owners listed on this list:

NOMBRE TOTAL DE COUPONS PAYES A CES ACTIONNAIRES:

Total number of ordinary shares listed on this list (ORD shares = DR shares \div 5): Total number of DRs listed on this list:

MONTANT TOTAL DES DIVIDENDES AVANT ET APRES RETENUE A LA SOURCE:

Total amount of dividends allocable to these beneficial owners at 100% (ORD share amount \times 0.79): Total amount of withholding tax for these beneficial owners at 15% (Above amount \times 15%):

A summary page must be attached to each shareholder category.

Do not use this summary page for **Canadian Pension Funds**.

Attach to Each List:

- Appendix C (Annex III of the French regulation) declaration for U.S. Entities signed by an officer or partner of the DTC participant, and sealed with DTC participant seal (Medallion or other).
- Appendix D (Annex IV of the French regulation) declaration for Canadian Entities signed by an officer or partner of the DTC participant, and sealed by DTC participant seal (Medallion or other).

Appendix B.3 – Summary Page for Canadian Pension Funds

This summary page must be attached to your Canadian Pension Fund list.

Attach to your Canadian Pension Fund List:

• Appendix D (Annex IV of the French regulation) declaration for Canadian Entities signed by an officer or partner of the DTC participant, and sealed by DTC participant seal (Medallion or other).

Total amount of dividends allocable to these beneficial owners at 100% (ORD share amount X 0.79):

• Appendices E1 or E2 (Canadian Pension Fund attestation) should be submitted per beneficial owner, and must be certified by Revenue Canada. The French versions are preferred.

APPENDIX C1: ANNEXE III Attestation

A produire par l'établissement financier qui gère aux Etats-Unis le compte titre du non-résident et qui souhaite être dispensé de la présentation d'un formulaire 5052 RF 1 - EU par bénéficiaire (1)

entre la France et les Etats-Unis et l.instruction administrative du 14 f	évrier 2005 :
Je, soussigné	(nom et DResse), agissant en qualité ents des Etats-Unis, demande le bénéfice de la 2005 pour l'application aux actionnaires qui sont n ce qui concerne les dividendes payés par la ou les
☐ Je déclare, en ce qui concerne les fonds de pension ou l.organ chacun d.eux et transmise à l.administration fiscale franç en France, chacun des organismes mentionnés sur la liste cidispositions des sections 401 (a) ou 401 (b) ou 403 (b) ou 45 américain(2);	çaise par l.intermédiaire de l.établissement payeur jointe a été créé et fonctionne conformément aux
☐ Je déclare, en ce qui concerne les « Regulated Investme » et « Real Estate Mortgage Investment Conduits » que chacijointe remplit les conditions prévues au paragraphe 2 b) franco-américiaine du 31 août 1994 et que j.ai joint à cette lis de l.administration fiscale américaine de la qualité de RIC, REIT et REMIC établie par l.administration fiscale américaine.	un des bénéficiaires mentionnés sur la liste ci- iii de l.article 4 de la convention fiscale ste (indiquer le nombre) attestations IC, REIT et REMIC des bénéficiaires/la liste des
☐ Je déclare, qu.à ma connaissance, chaque actionnaire (au charitable, RIC, REIT ou REMIC) mentionné sur la liste ci-jumentions portées sur cette liste sont exactes (2).	
J.atteste qu.à ma connaissance, toutes les personnes ci-drequises pour bénéficier des avantages qu.elles demandent (e établissement stable ou une base fixe auxquels se rattache e dividendes) et je déclare avoir fait toute diligences pour m.assurer m.ont communiquées à ce sujet; au cas ou néanmoins je viendrai bénéficié d.un avantage indu, je m.engage à en informer spollétablissement payeur en France;	et notamment ne possèdent pas en France un ffectivement la participation génératrice des r de l.exactitude des informations que ces personnes is à apprendre que certaines d.entre elles ont
Je m.engage par ailleurs solidairement avec cet établissemen spontanément, soit sur demande de l.administration fiscale fr avantage dont une personne aurait bénéficié indûment.	
	Fait à le <u>January 1, 2013</u>
	(cachet) (nom et qualité du signataire)
(1) Produire 1 imprimá dons la langua de votre choix	

- (1) Produire l.imprimé dans la langue de votre choix.
- (2) Cocher la case adéquate.

APPENDIX C2: ANNEX III Certificate

To be produced by financial institutions managing a non-resident's securities account in the United States that wish to be exempted from filing a 5052 RF 1 – EU form for each beneficiary (1)

For the purpose of the reduction of French dividend tax granted under the tax treaty of 31 August 1994 between

France and the United States and Administrative Instruction of 14 February 2005: I, the undersigned, (name and address), acting in my capacity as the foreign manager of securities accounts held residents of the United States, hereby request that the simplified procedure stipulated in the Administrative Instruction of 14 February 2005 be applied to grant shareholders residing in the United States the advantages stipulated in the tax treaty with regard to dividends paid by the French company(ies) ______ (year in which dividends are paid). ☐ I hereby declare that each of the pension funds and charitable organisations on this list, according to the certificates received by each and transmitted to the French tax administration through the paying institution in France, was created and operates in compliance with the provisions of Sections 401 (a) or 401 (b) or 403 (b) or 457 or 501 (c) 3 of the American Federal Tax Code(2); ☐ I hereby declare that each of the Regulated Investment Companies, Real Estate Investment Trusts and Real Estate Mortgage Investment Conduits on this list complies with the requirements set out in Paragraph 2 b) iii of Article 4 of the tax treaty of 31 August 1994 between France and the United States and that I have appended to this list _____ (specify the number) certificates from the American tax administration certifying the RIC, REIT or REMIC status of the beneficiaries/the list of RICs, REITs or REMICs drawn up by the American tax administration(2); ☐ I hereby declare that, to the best of my knowledge, each shareholder (other than pension funds, charitable organisation, RICs, REITs or REMICs) on this list is a resident of the United States and that the information provided in this list is accurate(2). I hereby certify that, to the best of my knowledge, all of the persons listed above comply with all of the requirements for obtaining the advantages being requested (and more specifically, they do not have a permanent establishment or fixed base in France to which the equity shares generating the dividends belong) and I hereby declare that I have undertaken all due diligence to make sure that the information that these persons have given me on this subject is accurate; in the event I should learn that any of them have benefited from an improper advantage, I hereby undertake to inform the French tax administration and the paying institution of my own accord. I also hereby commit myself jointly and severally with the paying institution to compensating the French Treasury, of my own accord or at the request of the French tax administration, for the amounts corresponding to any advantage improperly obtained. Done at ______ on January 1, 2013 (name and title of signatory) (seal)

- (1) Fill in the form in the language of your choice.
- (2) Check the appropriate box.

APPENDIX D1: ANNEXE IV Attestation

A produire par la personne qui gère à l'étranger le compte titre du non-résident (1)

En vue de la réduction de l'impôt français sur les dividendes, c	conformément à l	a convention fiscale entre la France
et:		
Je, soussigné		
	(nom	et DResse), agissant en qualité de
gestionnaire hors de France de comptes titres ouverts au nom de res	sidents de	,
demande le benefice de la procedure simplifiée prevue par l'instruct	tion administrativ	re du 14 Février 2005 pour
l'application aux actionnaires qui sont des residents de		des advantages
prévus par la convention fiscale précitée en ce qui concerne les divi	dendes payés par	la ou les sociétés françaises
(nom de	e la ou des sociét	és distributrices), le
(préciser l'année de mise en paiement).		
Je declare avoir reçu pour chaque bénéficiaire des dividend	des mentionnés su	ır la liste ci-jointe, l'original des
attestations requises dûment complétées et avoir joint à cette liste le	es attestations/une	copie conforme des attestations (2),
soit un total de attestations/copies (indiquer le nom	ıbre d'attestatioı	ns ou de copies d'attestations
jointes);		
Au cas où une des personnes mentionnées sur la liste béné	ficierait d'un adv	antage indu, je m'engage
solidairement avec l'établissement payeur en France, à restituer les	montants en caus	e au Trésor français, soit
spontanément, si je venais à en avoir connaissance, soit sur demand	le de l'administrat	tion fiscale française.
	Fait à	le <u>January 1, 2013</u>
	(cachet)	(nom et qualité du signataire)
(1) Produire l.imprimé dans la langue de votre choix.		

(2) Rayer la mention inutile.

APPENDIX D2: ANNEX IV Certification

ALL FORMS FOR THE LONG FORM PROCESS IS PROVIDED BY THE RESPECTIVE TAX AUTHORITY. THEREFORE, WE CANNOT STANDARDIZE

To be produced by the person in a foreign country Managing a non-resident's securities account (1)

For the purpose of the reduction of French dividend		the tax treaty between France and
I, the undersigned,		
acting in my capacity as the manager outside of Franc	e of securities acco	unts held by residents of
, hereby	request that the sir	mplified procedure stipulated by the
Administrative Instruction of 14 February 2005 be applied	d to grant sharehold	ders residing in
the advantages stipulated in the above mentioned tax trea	ty with regard to di	ividends paid by the French
company(ies)		
(name (s) of the company (ies)), in	(year in which div	vidends are paid).
I hereby declare that I have received from each share certificates required, duly completed, and have appended	C	
making a total of certificates/copies (specif	fy the number of c	ertificates or copies of certificates
appended);		
In the event that any of the persons on the list were to jointly and severally with the paying institution in France question, of my own accord if I discover improperly obtain administration.	e to compensating th	he French Treasury for the amounts in
aummstration.	Done at	on <u>January 1, 2013</u>
	(seal)	(name and title of signatory)
(1) Fill in the form in the language of your choice.		
(2) Check the appropriate box.		

APPENDIX E1: ANNEXE I (Canadian Pensions)

Attestation à produire par les organismes canadiens visés à l'article 29, paragraphe 7, alinéa b

En vue de l'exonération de l'impôt français sur les dividendes de source française payés à ces organismes gérés exclusivement au Canada aux fins d'adm inistrer des fonds ou de verser des prestations en vertu d'un ou de plusieurs régimes de pension ou de retraite et qui y sont exonérés d'impôt, conformément à la convention fiscale entre la France et le Canada du 2 mai 1975 telle que modifiée par l'avenant du 30 novembre 1995.

		(nom et DResse du fiduciaire / administrateur) certifie que
	, es	(dénomination et DResse) a été constitué au st établi au Canada et est
	(a) (a) une fiducie régie par un ré d'un RPA dont :	gime de pension agréé canadien (RPA) ou une société de gestion
		t du régime est; et de la fiducie ou de la société de gestion est, ou
(nom et D	Resse du fiduciaire/administrateu	ur de la société de fiducie) certifie que l'organisme
		(dénomination et DResse) a, est établi au Canada et est (ou les organismes
	(b) (b) un ou des régimes enregis du ou des régimes, et :	trés d'épargne-retraite pour lequel la société de fiducie est l'émetteur
		ation du modèle de régime est; et de la société de fiducie est, ou
	(c) (c) un ou des fonds enregistré l'émetteur du ou des fonds et :	s de revenu de retraite pour lequel la société de fiducie est
		ation du modèle de fonds est, et de la société de fiducie est,
fiscale fra		a b, i, ii et iii du paragraphe 7 de l'article 29 de la convention de l'exonération de l'impôt français prélevé par voie de retenue
		français, spontanément ou sur demande de l'administration int à un avantage dont l'organisme aurait bénéficié indûment.
Lieu et date		Signature d'un agent autorisé du fiduciaire, de la société de gestion ou de la société de fiducie
	Attestation des autor	ités fiscales de l'état de résidence du bénéficiaire
sa connai		s fournis par le requérant dans la présente demande sont, à conformité aux conditions prévues à l'alinéa b, ii et iii du on qui n'a pas été vérifiée.
Lieu et date		Signature de la personne autorisée des autorités fiscales Canadiennes

APPENDIX E2 : ANNEX II (Canadian Pensions)

Statement to be completed by Canadian organizations contemplated in article 29, paragraph 7, subparagraph b

For the exemption of French tax on French dividends paid to these organizations operated in Canada exclusively to administer or provide benefits from one or more pension or retirement plans and that are exempt from tax, in accordance with the France-Canada Tax Convention of May 2, 1975, as amended by the Protocol dated November 30, 1995.

The undersigned(name and address of trustee/ad	Iministrator) hereby certifies that the organization
the, established	(name and address) constituted in Canada
(a) a trust governed by a Canadian registered pe	ension plan (RPP) or a pension corporation whose
- plan registration number is	, and
- the account number of the trust or pe	ension corporation is; or
the undersigned	
, established in Canada and is (o	
(b) a registered retirement savings plan(s) for winglen(s) and	hich the corporate trustee is the issuer of the
- the specimen plan identification nun	nber is, and
- the account number of the corporate	trustee is; or
(c) a registered retirement income fund(s) for wand	hich the corporate trustee is the issuer of the fund(s)
- the specimen fund identification num	nber is, and
- the account number of the corporate	trustee is;
which satisfies the conditions set out in subparagraph b, i, Canada Tax Convention in order to be exempted from Fre	
The undersigned agrees to restore to the French treasury, sauthorities, any amount corresponding to a benefit the org	
Location and date	Signature of an officer authorized by the trustee, the pension corporation, or the corporate trustee
Statement of the tax au	nthorities of the recipient's receiving State
The undersigned hereby certifies that the information provhis/her knowledge, accurate, except the compliance with the paragraph 7 of article 29 which was not verified.	
Location and date	Signature of the person authorized by the Canadian tax authorities

Appendix F - File Layout - Beneficial Owner Detail File

SIMPLIFIED PROCEDURE -- ASCII or EXCEL FILE

BENEFICIAL OWNER DETAIL FILE DATA FORMAT COMPULSORY

N°	NARRATIVE	TYPE	NUMBER OF CHARACTERS	DECIMAL	DATA	COMMENTS
	SECURITY					
	IDENTIFICATION					ISIN # FOR THE ORDINARY SHARES
1	ISIN#	A/N	12	N	Υ	
2	NAME OF SECURITY	A/N	30	N	Υ	
3	DUE DATE	N	8	N	Y	DDMMYYYY
4	DTC NUMBER	N	4	N	Υ	
5	BENEFICIARY NAME	A/N	120	N	Υ	
6	TAX_ID	A/N	15	N	Υ	TAX ID OF THE BENEFICIARY
l _ l	155.65%		40		.,	OLIANITITY OF ARR
7	ADR_QTY	N	12	N	Y	QUANTITY OF ADR
						QUANTITY OF ORDINARY SHARES,
						QUANTITY IN FIELD 7 X ADR RATIO WHICH
						WILL BE SUPPLIED BY ADR DEPOSITARY
8	ORD_QTY	N	12	2	Υ	BANK AND FURNISHED BY DTC
9	ID_CTRY	A/N	2	N	Υ	COUNTRY IDENTIFIER (US)
10	ADDRESS LINE 1	A/N	65	N	Υ	
11	ADDRESS LINE 2	A/N	65	N	Υ	
						A = INDIVIDUALS
						B = CORPORATIONS C = PENSION FUNDS
	STATUS OF					K = FOUNDATIONS / CHARITIES
12	BENEFICIAL OWNER	A/N	1	N	Υ	E = RICS, REITS, & REMICS

Appendix F (continued) - File Layout - Beneficial Owner Detail File

1	2	3	4	5	6	7	8
SECURITY IDENTIFICATION ISIN #	NAME OF SECURITY	DUE DATE	DTC NUMBER	BENEFICIARY NAME	TAX_ID	ADR_QTY	ORD_QTY
FR0000120693	PERNOD-RICARD SA	05072013	2504	John Doe	122413689	2500	500
FR0000120693	PERNOD-RICARD SA	05072013	2504	Eric Smith	142514258	2000	400

9	10	11	12
ID_CTRY	ADDRESS LINE 1	ADDRESS LINE 2	STATUS OF BENEFICIAL OWNER
US	125 Any Street	New York, NY 10004	А
03	123 Arry Street	New York, NY	Α
US	800 Abbey Road	10589-5413	Α

STATUS OF BENEFICIAL OWNER CODES			
А	INDIVIDUALS		
В	CORPORATIONS		
С	PENSION FUNDS		
К	FOUNDATIONS / CHARITIES		
Е	RICS, REITS, & REMICS		

EXHIBIT I - Rules to be applied when creating an ADR file

- 1. Please note that the previous Appendices B.2 B.8 Physical Beneficiary List formats have been eliminated. Going forward all beneficiary details should be submitted via ASCII (plain text), or Excel files regardless of the number of beneficiaries on your lists. If your company does not allow you to transmit electronic files and you have fewer than 50 beneficiaries you may input your data in the ADR file format, print that file out and include it with the rest of your documents. If you have more than 50 beneficiaries an ASCII or Excel file is required.
- 2. Files may be either ASCII (plain text), or Excel files indistinctly. The choice is completely at the discretion of the user. However, the Excel format is likely to be easier for the user to create and manipulate.
- 3. The order of fields (columns) must be strictly respected in both ASCII and Excel files, as specified in the document describing the structure (ADR_File_Example).
- 4. All the fields (columns) must have data in every line. All data is mandatory and cannot be omitted.
- 5. Numeric values in both ASCII and Excel files should not contain any commas, semicolons, or blanks.
- 6. The DUE DATE field must have the form DDMMYYYY (e.g. 05072013 for July 5, 2013). It is considered to be a text value, and not an integer number. Consequently, a number or date format in the Excel file should not be applied to this column.
- 7. In ASCII (plain text) format, if the value of a field is shorter than the maximum length specified for it, the value must be padded with blanks at its right, to obtain the maximum length specified. For example, if the value of ADD1 is "800, Abbey Road" (15 characters), it should be padded with 50 blanks the end: "800, Abbey Road", in order to obtain the specified length of 65 characters. This rule does not apply to Excel files. Never use the tab key to obtain blanks!
- 8. In Excel format, only the maximum length of the fields should be respected. Thus, the value of ADR1 "800, Abbey Road" (15 characters) is valid; "1964, Tutankhamun Lane, Home of the Rising Sun, Apartment 10B, Floor 15" is not, as its length (71 characters) is greater than 65 the maximum length allowed for this field.
- 9. In Excel format, the use of the semicolon (;) is prohibited.

The rules above should be scrupulously respected, in order to assure rapid and efficient integration of the provided files.

EXHIBIT II - COVER LETTER REQUIRED FOR FRENCH <u>STANDARD LONG FORM RECLAIMS</u> THIS DOCUMENT MUST BE PREPARED ON THE DTC PARTICIPANT'S LETTERHEAD

[DATE]

Globetax 90 Broad Street-16th Floor New York, NY 10004-2205 Attn: FRANCE

Enclosed please find tax reclamation documents, which we are submitting on behalf of our clients who wish to avoid excess withholding tax on French DS(s). We, [NAME OF DTC PARTICIPANT] , also identified as DTC participant number [DTC PARTICIPANT NUMBER], hereby state that each beneficial owner cited below held the respective amount of shares on the record date July 1, 2013 for the security PERNOD-RICARD SA.

Below is the list of beneficial owners and their holdings, which total **[TOTAL # OF DSs CITED BELOW]** DS(s). As required, the forms and a certification of residency document (Form 6166) if applicable, are enclosed for each beneficial owner. **The ratio is _ 5 DS (s) to _ 1 Ordinary share.** The information is as follows:

Name Address Type of Account Taxpayer ID # # of DS(s) held of beneficial owner

- 1)
- 2)
- 3)
- 4)

We ask that BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, and J.P Morgan Chase apply to the French Custodian Bank for the reduced withholding tax rate on the above beneficial owners' behalf. Please contact the undersigned at [SIGNATORY'S TELEPHONE NUMBER] or via email at [SIGNATORY'S EMAIL ADDRESS] should you have any questions.

Agreements, Representations and Indemnification

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, Citibank N.A., Deutsche Bank Trust Company Americas, and J.P Morgan Chase of up to \$0.01 per Depositary Share for standard Long Form tax reclaim (with a minimum of \$25.00), and any other charges, fees or expenses payable by or due to BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, and J.P Morgan Chase 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, Citibank N.A.'s, Deutsche Bank Trust Company Americas', and J.P Morgan Chase'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, Citibank N.A., Deutsche Bank Trust Company Americas, and J.P Morgan Chase 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, Citibank N.A., Deutsche Bank Trust Company Americas, and J.P Morgan Chase 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, Citibank N.A., Deutsche Bank Trust Company Americas, And J.P Morgan Chase shall not be liable for the failure to secure any refund. In consideration of the assistance of BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, and J.P Morgan Chase and the custodian in processing such claims, we expressly agree that BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, and J.P Morgan Chase and its agents or affiliates shall not have any liability for, and we shall indemnify, defend and hold each of BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, and J.P Morgan Chase 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 P	articipant]
[NAME AN	ND TITLE OF	FAUTHORIZED OFFICER F	OR DTC PARTICIPANT
PAYMENT	TADDRESS:		
			_ _