The Depository Trust Company IMPORTANT

B#: 3801

DATE: August 11, 2008

TO: All Participants

CATEGORY: Dividends

FROM: International Services

ATTENTION: Operations, Reorg & Dividend Managers, Partners & Cashiers

SUBJECT: TaxRelief - Country: Switzerland

Zurich FDG TR VI PFD 144A CUSIP: 989942206 Record Date: 08/15/08 Payable Date: 10/27/08

EDS Cut-Off Date: 08/26/08

DTC has been notified by The Bank of New York Mellon, the paying agent for the above referenced issue, that **PFD144A ZURICH FDG TR VI** has declared a cash payment. This payment is subject to Swiss withholding tax of 35%, which will be refunded to those U.S. residents who qualify. A specialized tax reclaim procedure has been put in place for those who qualify for 0% tax withholding.

Participants are reminded that for filing reclaim purposes, they can certify their dividend payment information (tax withheld and applicable number of shares) by using their own records as well as printouts of their DTCC Cash Settlement Report for the applicable payment date and the "DIVA" Announcement, which reports the gross dividend rate and the withholding tax rate for the payment.

Note: THE DEADLINE FOR CERTIFYING OVER EDS IS AUGUST 26, 2008.

Questions regarding this Important Notice may be directed to Mr. Larry Bottiglieri of the International area at DTCC at 212-855-4386 or Sylvia Antonio at 813-470-1559

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

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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.

THE BANK OF NEW YORK MELLON

New York's First Bank - Founded 1784 By Alexander Hamilton

101 BARCLAY STREET, NEW YORK, NEW YORK 10286

August 11, 2008

IMPORTANT NOTICE

To: DTCC

From: Helene Ng-Yik, Assistant Vice President, Corporate Trust Operations

Subject: Tax Relief- Switzerland

PFD 144A ZURICH FDG TR VI CUSIP: 989942206

Record Date: 8/15/08 Payable Date: 10/27/08

Trust VI All in Rate: 9.165 EDS Cut-Off Date: 8/26/08 Agent Cut-Off Date: 8/27/08

Please inform all participants that a 35% Swiss withholding tax on interest will apply to the above referenced issue, which will ultimately reduce the distributions on the Trust Capital Securities I and II, unless the DTC participant provides the properly completed reclaim information to the Paying Agent in connection with the distribution no later than 8/27/08.

In order to have a valid election each participate must use the DTC's Elective Dividend System (EDS) function over the Participant Terminal System (PTS) or the Tax Relief function over the Participant Browser Service (PBS) to certify all or a portion of their position.

NOTE: THE DEADLINE FOR CERTIFYING OVER EDS IS AUGUST 26, 2008.

In addition to certifying on DTC's PTS, participants must provide hard copy certifications (Annex A) supporting the EDS elections to the Bank of New York Mellon on or prior to **AUGUST 27, 2008**.

Participant must complete the information requested in Annex A and delivering the same to:

The Bank of New York Mellon 101 Barclay Street –7E New York, NY 10286 Tel: 212-815-6921

Fax: 212-815-3799/3800 Attention: Helene Ng-Yik helene.ng@bnymellon.com **Attention: Philip Moran**

philip.moran@bnymellon.com

Attention: Judy Pon

judy.pon@bnymellon.com

Attention: Vanessa Mack

vanessa.mack@bnymellon.com

Tel: 212-815-5346 Fax: 212-815-5802/003

Attention: Libby Mitchell libby.mitchell@bnymellon.com

Participants must certify on DTC's PTS <u>AND</u> submit hard copy certifications (Annex A) to The Bank of New York Mellon, otherwise the participants will be paid at the unfavorable rate.

Relief from the 35% Swiss withholding tax on interest is available via DTC EDS only to United States holders.

Holders making incorrect declarations or who have missed the deadline will be responsible for claiming or refunding any withholding tax to the Swiss Authorities at <u>WWW.ESTV.ADMIN.CH</u>. Participants will also be liable for any foreign exchange fluctuations impacting the amount of their refund or claim with the Swiss Tax Authorities.

Any questions regarding the attached annex should be directed to Philip Moran of The Bank of New York Mellon at (212) 815-8106.

Questions regarding this notice may be directed to Larry Bottiglieri of DTCC's International Services at (212) 855-4386

To: The Bank of New York (as paying agent)

Philip Moran Attention: 212.815.8106 Phone:

Email: philip.moran@bnymellon.com

From: **DTC** Participant

Name Phone Email

Zurich Farmers RegCaps Funding Trust Security:

Cusip #

Custodian has Custodian has been informed that been informed

that holder is a US Holder is a US **Number of Trust** tax resident? (Yor Corporation (Y or Capital Securities

US Taxpayer ID Name Beneficial Holder Number N) Owned **Address** N)

Total:

For Trust Capital Securities Held by Money Managers:

Percentage of **Beneficial Owners**

that are US tax **Number of Trust**

Name Money Manger residents Securities Owned **Address**

Total: (Must equal 100%)