



*Important Notice*  
The Depository Trust Company

<b>B #:</b>	0757-12
<b>Date:</b>	December 6, 2016
<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>	<p><b><u>Tax Relief</u></b> – Country: Germany SAP AG CUSIP: 803054204</p> <p><b><u>Record Date:</u> 05/23/2012 <u>Payable Date:</u> TBA</b></p> <p><b><u>EDS Cut-Off:</u> 06/07/2012 8:00 P.M.</b></p> <p><b><u>EDS Cut-Off:</u> 06/28/2012 8:00 P.M.</b></p> <p><b>REVISED LONG FORM DATE</b></p>

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. Participants are urged to consult the PTS or PBS function TAXI or TaxInfo respectively before certifying their elections over PTS or PBS.

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

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

DTCC offers enhanced access to all important notices via a Web-based subscription service. The notification system leverages RSS Newsfeeds, providing significant benefits including real-time updates and customizable delivery. To learn more and to set up your own DTCC RSS alerts, visit [http://www.dtcc.com/subscription\\_form.php](http://www.dtcc.com/subscription_form.php).

Non-Confidential

**SAP AG** has announced a cash dividend. Deutsche Bank Trust Company Americas acts as the sole Depositary for the company's American Depositary Receipt ("ADR") program.

Participants can use DTC's Corporate Actions Web (CA Web) instructions tab to certify all or a portion of their position entitled to the applicable withholding tax rate. Use of these instruction methods will permit entitlement amounts to be paid through DTC. By electing, Participants agree to the Agreements, Representations and Indemnification below.

On ADR Pay Date, all holders will receive this dividend net of the full German statutory withholding tax of 26.375% with the possibility to reclaim post-paydate as outlined in the below table.

DIVIDEND EVENT DETAILS	
COUNTRY OF ISSUANCE	GERMANY
ISSUE	SAP AG
CUSIP#	803054204
DEPOSITARY	DEUTSCHE BANK TRUST COMPANY AMERICAS
ADR RECORD DATE	5/23/2012
ADR PAY DATE	6/1/2012
ORDINARY SHARE GROSS DIVIDEND RATE	€ 1.10
RATIO	1 ORD to 1 ADR

CHARGES & DEADLINES					
FILING METHOD	BATCH	PAYMENT METHOD	SERVICE CHARGE	MINIMUM SERVICE CHARGE PER BENEFICIAL OWNER	FINAL SUBMISSION DEADLINE (ALL TIMES EST)
QUICK RECLAIM	U.S. ONLY	CA WEB	\$0.0115 per ADR	\$0	<b>7 JUNE 2012;</b> 8:00 P.M.
	NON-US ONLY	CHECK/ACH	\$0.0115 per ADR	\$0	<b>7 JUNE 2012;</b> 8:00 P.M.
	BATCH 2	CHECK/ACH	\$0.0115 per ADR	\$0	<b>28 JUNE 2012;</b> 8:00 P.M.
	BATCH 3	CHECK/ACH	\$0.0115 per ADR	\$0	<b>14 NOVEMBER 2012;</b> 8:00 P.M.
LONG FORM	POST-QUICK REFUND PROCESS; ONGOING	CHECK/ACH	\$0.0150 per ADR	\$25 plus Custodial Fee of up to €40	<b>30 SEPTEMBER 2016;</b> 8:00 P.M.

## QUICK REFUND ELIGIBILITY MATRIX (SEE APPENDIX 1 & 2 FOR DETAILS)

IMPORTANT DISCLAIMER: FOR THE QUICK REFUND PROCESS, CLAIMS ARE INITIATED WITH DEUTSCHE BANK/ GLOBETAX UPON RECEIPT OF THE ESP SUBMISSION OR ORIGINAL COVER LETTER. THE OTHER DOCUMENTS OUTLINED BELOW DO NOT NEED TO BE SUBMITTED AT THE TIME OF THE CLAIM BUT SHOULD BE MAINTAINED BY THE DTC PARTICIPANT TO PRESENT TO THE GERMAN TAX AUTHORITIES UPON REQUEST.

RATE DESCRIPTION	RECLAIM RATE	ELIGIBLE RESIDENTS	DOCUMENTATION REQUIRED
<b>UNFAVORABLE</b> 26.375%	<b>0.000%</b>	NON-TREATY COUNTRIES	NONE
<b>FAVORABLE</b> 25%	<b>1.375%</b>	GREECE, ISRAEL	1. EXHIBIT 1— COVER LETTER 2. EXHIBIT 2— BENEFICIARY AUTHORIZATION
<b>FAVORABLE</b> 20%	<b>6.375%</b>	IRAN, THAILAND, TRINIDAD & TOBAGO, ZIMBABWE	1. EXHIBIT 1— COVER LETTER 2. EXHIBIT 2— BENEFICIARY AUTHORIZATION
<b>FAVORABLE</b> 15% (CERTAIN U.S. ENTITIES)	<b>11.375%</b>	NATURAL PERSONS	1. EXHIBIT 1— COVER LETTER 2. EXHIBIT 2— BENEFICIARY AUTHORIZATION 3. FORM 6166— TAX YEAR 2012
		ASSOC. WITHOUT INDEPENDENT LEGAL EXISTENCE	1. EXHIBIT 1— COVER LETTER 2. EXHIBIT 2— BENEFICIARY AUTHORIZATION 3. EXHIBIT 5— ZUSATZERKLÄRUNG USA 4. IRS FORM 6166— TAX YEAR 2012
		LEGAL PERSON / SUPRANATIONAL ORGS.	1. EXHIBIT 1— COVER LETTER 2. EXHIBIT 2— BENEFICIARY AUTHORIZATION 3. IRS FORM 6166— TAX YEAR 2012
		INVESTMENT FUNDS	1. EXHIBIT 1— COVER LETTER 2. EXHIBIT 2— BENEFICIARY AUTHORIZATION 3. EXHIBIT 5— ZUSATZERKLÄRUNG USA 4. IRS FORM 6166— TAX YEAR 2012
<b>FAVORABLE</b> 15% (NON-U.S.)	<b>11.375%</b>	CERTAIN TREATY COUNTRIES (SEE APPENDIX 2)	1. EXHIBIT 1— COVER LETTER 2. EXHIBIT 2— BENEFICIARY AUTHORIZATION
		TAX-TRANSPARENT ENTITIES IN CERTAIN TREATY COUNTRIES (SEE APPENDIX 2)	1. EXHIBIT 1— COVER LETTER 2. EXHIBIT 2— BENEFICIARY AUTHORIZATION 3. EXHIBIT 5— ZUSATZERKLÄRUNG
<b>FAVORABLE</b> 10%	<b>16.375%</b>	BOLIVIA, CHINA, GEORGIA, INDIA, MONGOLIA, THE NETHERLANDS (PENSION FUNDS ONLY) SYRIA, TAIWAN, UKRAINE, UNITED ARAB EMIRATES, UNITED KINGDOM (PENSION FUNDS ONLY)	1. EXHIBIT 1— COVER LETTER 2. EXHIBIT 2— BENEFICIARY AUTHORIZATION
<b>EXEMPT - 0%</b> (CERTAIN U.S. ENTITIES)	<b>26.375%</b>	CHARITIES: 501(C)3	1. EXHIBIT 1— COVER LETTER 2. EXHIBIT 2— BENEFICIARY AUTHORIZATION 3. IRS FORM 6166— TAX YEAR 2012
		PENSIONS & RETIREMENT ACCOUNTS: 401(A); 408(K); 408(A); 408(P); 403(A); 403(B); 457(B);	1. EXHIBIT 1— COVER LETTER 2. EXHIBIT 2— BENEFICIARY AUTHORIZATION 3. EXHIBIT 6— PENSION DECLARATION 4. IRS FORM 6166—TAX YEAR 2012

### All long form filings:

U.S. residents and non-U.S. residents who have missed the Quick Refund deadlines may file for a long form refund if they submit requisite documentation to Deutsche Bank, through its agent GlobeTax, prior to the expiry of the right to claim. Based on their country, that period generally expires four (4) years from the end of the year in which the dividend was paid in the local market. Claims received after the long form deadline will be filed on a good faith basis at the discretion of GlobeTax on behalf of Deutsche Bank.

**Note:** German residents may not participate in the processes described herein.

## LONG FORM ELIGIBILITY MATRIX (SEE APPENDIX 1 & 2 FOR DETAILS)

RATE DESCRIPTION	RECLAIM RATE	ELIGIBLE RESIDENTS	DOCUMENTATION REQUIRED
<b>UNFAVORABLE - 26.375%</b>	<b>0.000%</b>	NON-TREATY COUNTRIES	NONE
<b>FAVORABLE - 25%</b>	<b>1.375%</b>	GREECE, ISRAEL	<ol style="list-style-type: none"> <li>1. EXHIBIT 1—COVER LETTER</li> <li>2. EXHIBIT 2— BENEFICIARY AUTHORIZATION</li> <li>3. EXHIBIT 3— PARTICIPANT AUTHORIZATION</li> <li>4. EXHIBIT 8—CREDIT ADVICE</li> <li>5. GERMAN TAX FORM</li> </ol>
<b>FAVORABLE - 20%</b>	<b>6.375%</b>	IRAN, THAILAND, TRINIDAD & TOBAGO, ZIMBABWE	<ol style="list-style-type: none"> <li>1. EXHIBIT 1—COVER LETTER</li> <li>2. EXHIBIT 2— BENEFICIARY AUTHORIZATION</li> <li>3. EXHIBIT 3— PARTICIPANT AUTHORIZATION</li> <li>4. EXHIBIT 8—CREDIT ADVICE</li> <li>5. GERMAN TAX FORM</li> </ol>
<b>FAVORABLE - 15% (CERTAIN U.S. ENTITIES)</b>	<b>11.375%</b>	NATURAL PERSONS	<ol style="list-style-type: none"> <li>1. EXHIBIT 1—COVER LETTER</li> <li>2. EXHIBIT 2— BENEFICIARY AUTHORIZATION</li> <li>3. EXHIBIT 3— PARTICIPANT AUTHORIZATION</li> <li>4. EXHIBIT 8—CREDIT ADVICE</li> <li>5. IRS FORM 6166 — TAX YEAR 2012</li> </ol>
		ASSOC. WITHOUT INDEPENDENT LEGAL EXISTENCE	<ol style="list-style-type: none"> <li>1. EXHIBIT 1—COVER LETTER</li> <li>2. EXHIBIT 2— BENEFICIARY AUTHORIZATION</li> <li>3. EXHIBIT 3— PARTICIPANT AUTHORIZATION</li> <li>4. EXHIBIT 5 — ZUSATZERKLÄRUNG <b>USA</b></li> <li>5. EXHIBIT 8—CREDIT ADVICE</li> <li>6. IRS FORM 6166 — TAX YEAR 2012</li> </ol>
		LEGAL PERSON / SUPRANATIONAL ORGS.	<ol style="list-style-type: none"> <li>1. EXHIBIT 1—COVER LETTER</li> <li>2. EXHIBIT 2— BENEFICIARY AUTHORIZATION</li> <li>3. EXHIBIT 3— PARTICIPANT AUTHORIZATION</li> <li>4. EXHIBIT 8—CREDIT ADVICE</li> <li>5. IRS FORM 6166 — TAX YEAR 2012</li> </ol>
		INVESTMENT FUNDS	<ol style="list-style-type: none"> <li>1. EXHIBIT 1—COVER LETTER</li> <li>2. EXHIBIT 2— BENEFICIARY AUTHORIZATION</li> <li>3. EXHIBIT 3— PARTICIPANT AUTHORIZATION</li> <li>4. EXHIBIT 5 — ZUSATZERKLÄRUNG <b>USA</b></li> <li>5. EXHIBIT 8—CREDIT ADVICE</li> <li>6. IRS FORM 6166 — TAX YEAR 2012</li> </ol>
<b>FAVORABLE - 15% NON-U.S.</b>	<b>11.375%</b>	CERTAIN TREATY COUNTRIES (SEE EXHIBIT 7)	<ol style="list-style-type: none"> <li>1. EXHIBIT 1—COVER LETTER</li> <li>2. EXHIBIT 2— BENEFICIARY AUTHORIZATION</li> <li>3. EXHIBIT 3— PARTICIPANT AUTHORIZATION</li> <li>4. EXHIBIT 8—CREDIT ADVICE</li> <li>5. GERMAN TAX FORM</li> </ol>
		TAX-TRANSPARENT ENTITIES IN CERTAIN TREATY COUNTRIES (SEE EXHIBIT 7)	<ol style="list-style-type: none"> <li>1. EXHIBIT 1—COVER LETTER</li> <li>2. EXHIBIT 2— BENEFICIARY AUTHORIZATION</li> <li>3. EXHIBIT 3— PARTICIPANT AUTHORIZATION</li> <li>4. EXHIBIT 5 — ZUSATZERKLÄRUNG</li> <li>5. EXHIBIT 8—CREDIT ADVICE</li> <li>6. GERMAN TAX FORM</li> </ol>
<b>FAVORABLE - 10%</b>	<b>16.375%</b>	BOLIVIA, CHINA, GEORGIA, INDIA, MONGOLIA, THE NETHERLANDS (PENSION FUNDS ONLY) SYRIA, TAIWAN, UKRAINE, UNITED ARAB EMIRATES	<ol style="list-style-type: none"> <li>1. EXHIBIT 1—COVER LETTER</li> <li>2. EXHIBIT 2— BENEFICIARY AUTHORIZATION</li> <li>3. EXHIBIT 3— PARTICIPANT AUTHORIZATION</li> <li>4. EXHIBIT 8—CREDIT ADVICE</li> <li>5. GERMAN TAX FORM</li> </ol>
		UNITED KINGDOM PENSION BENEFICIAL OWNERS ONLY	<ol style="list-style-type: none"> <li>1. EXHIBIT 1—COVER LETTER</li> <li>2. EXHIBIT 2— BENEFICIARY AUTHORIZATION</li> <li>3. EXHIBIT 3— PARTICIPANT AUTHORIZATION</li> <li>4. EXHIBIT 8—CREDIT ADVICE</li> <li>5. HM REVENUE &amp; CUSTOMS CERTIFICATE OF RESIDENCY</li> <li>6. HM REVENUE &amp; CUSTOMS PENSION CERTIFICATION</li> <li>7. GERMAN TAX FORM</li> </ol>

## DESCRIPTION OF VARIOUS DOCUMENTATION

EXHIBIT	DOCUMENT NAME	DESCRIPTION	ORIGINAL / COPY	SIGNATURE REQUIREMENT
1	PARTICIPANT COVER LETTER	Lists details of each Beneficial Owner's claim. Must be printed on DTC Participant firm letterhead. Must indemnify Deutsche Bank and its agent GlobeTax as on the exhibit provided.	ORIGINAL	DTC PARTICIPANT
2	BENEFICIARY AUTHORIZATION LETTER	1. Allows Deutsche Bank, through its agent GlobeTax to submit application on behalf of the Beneficial Owner and receive the reimbursement amounts. 2. Makes necessary declarations of eligibility.	COPY	BENEFICIAL OWNER
3	PARTICIPANT AUTHORIZATION LETTER	There only needs to be one participant authorization letter per filing of the issue from the participant. This certifies the depository to perform reclaim services on behalf of the participant.	ORIGINAL	DTC PARTICIPANT
5	ZUSATZERKLÄRUNG / ZUSATZERKLÄRUNG USA	Required of all tax transparent entities. This form must be completed by a representative of the entity.	COPY	BENEFICIAL OWNER
6	PENSION DECLARATION	For U.S. Pensions & Retirement Accounts only. Certifies that the Beneficial Owner is a U.S. Pension Fund under the meaning of Article 10, paragraph (3) subparagraph (b) of the Double Taxation Treaty between Germany and the United States.	COPY	DTC PARTICIPANT
8	CREDIT ADVICE/ CERTIFICATE OF DIVIDEND PAYMENT	Provides a breakdown of the share position as well as relevant beneficial owner information. Serves as a record of dividends paid with withholding taxes.	ORIGINAL	DTC PARTICIPANT
N/A	IRS TAX DETERMINATION LETTER	U.S. Only. Issued by the Internal Revenue Service, stating within the letter the name of the Beneficial Owner and confirmation that the entity is a 501(c)3.	COPY	IRS
N/A	IRS FORM 6166	U.S. Only. Issued by the Internal Revenue Service, stating the name and Taxpayer Identification Number of the Beneficial Owner. It must be issued for Tax Year 2012.	ORIGINAL	IRS
N/A	GERMAN TAX FORM	NON-US ONLY. This form must be completed and then certified by the local tax authority.	ORIGINAL	LOCAL TAX AUTHORITY

## CONTACT DETAILS

PRIMARY CONTACT	DANETTE MOORE
TELEPHONE	1-800-876-0959
FAX	1-866-888-1120
EMAIL ADDRESS	GERMANYESP@GLOBETAX.COM
COMPANY	GLOBETAX ON BEHALF OF DEUTSCHE BANK
STREET ADDRESS	ONE NEW YORK PLAZA, FLOOR 34
CITY/STATE/ZIP	NEW YORK, NY 10004
ADDITIONAL CONTACTS	APRIL RICHLAND

ESP

powered by **GLOBETAX**

Deutsche Bank Trust Company Americas offers ESP powered by GlobeTax, which allows for the secure and simplified transfer of beneficial owner level data from the participant to Deutsche Bank, and creates applicable documentation on the participant's behalf. Documentation only needs to be provided for Quick Refund upon audit of the BZSt. As described in this notice, all applicable documentation must be at the disposal of the DTC Participant for claims submitted through the ESP system. By using the system the Participant attests to their ability to comply with the terms of this Important Notice

These claims should be submitted through the following website, which requires a one-time registration.

<https://esp.globetax.com>

Please contact Danette Moore at 1-800-876-0959 if you have any questions about this process.

### Warning and Disclaimer:

The information and data contained in this Notice is based on information obtained from multiple sources believed to be reliable. However, Deutsche Bank Trust Company Americas and its agents do not warrant or guarantee the accuracy or completeness of, nor undertake to update or amend, this information or data. We and our agents expressly disclaim any liability whatsoever for any loss howsoever arising from or in reliance upon any of this information or data. The information contained in this Notice is subject to change, including in the and subject to discretion of third parties, and/or pre-emption or being superseded by local market rules, and practices or actions taken by non-U.S. agents or tax authorities. Deadlines often differ from statutory deadlines. You should file claims as soon as possible, and at least six months prior to the specified deadline.

## ANOMALIES

COUNTRY	DESCRIPTION
ALL	PASS-THROUGH ENTITIES SUCH AS PARTNERSHIPS, TRUSTS, RICS, AND INVESTMENT FUNDS MAY NEED TO PROVIDE ADDITIONAL DOCUMENTATION IF REQUESTED BY THE BZSt. THE TOTAL REFUND ELIGIBILITY MAY BE REDUCED DEPENDING ON THE PERCENTAGE OF THE ENTITY HELD BY INVESTORS THAT DO NOT RESIDE IN THE ENTITY'S COUNTRY OF TAX RESIDENCE.
UNITED STATES	NATURAL PERSONS OR INDIVIDUALS MAY NOT PROVIDE POST OFFICE BOXES OR "C/O" ADDRESSES ALONE AS BENEFICIAL OWNER ADDRESS.
UNITED KINGDOM	U.K. PENSION SCHEMES ARE NOW ENTITLED TO A 10% WITHHOLDING TAX RATE, AND 5% FOR SHAREHOLDINGS GREATER THAN 10%. CLAIMS FOR U.K. PENSION SCHEMES CAN ONLY BE FILED VIA THE LONG FORM PROCESS AND REQUIRE ADDITIONAL DOCUMENTATION ISSUED BY HM REVENUE & CUSTOMS WHICH EVIDENCES THEIR STATUS AS A PENSION FUND.
ALL	THE GERMAN GOVERNMENT RESERVES THE RIGHT TO REQUEST CERTIFICATIONS OF TAX RESIDENCY FOR ANY FILER SUBMITTING CLAIMS THROUGH THE QUICK RECLAIM PROCESS.
FRANCE	FRENCH PENSION FUNDS ARE NO LONGER ELIGIBLE FOR THE QUICK REFUND PROCESS. THEY CAN STILL RECLAIM UNDER THE LONG FORM PROCESS WITH A SUBMISSION OF THE REQUIRED DOCUMENTATION.

## FREQUENTLY ASKED QUESTIONS (FAQs)

QUESTION	ANSWER
CAN I SIGN THE AUTHORIZATION ON BEHALF OF MY CLIENT?	NO, ONLY THE ULTIMATE BENEFICIAL OWNER MAY SIGN THE AUTHORIZATION LETTER.
HOW LONG DOES IT TAKE FOR PAYMENT ON LONG FORM CLAIMS?	APPROXIMATELY 7 MONTHS.
AM I REQUIRED TO FILE THROUGH ESP?	NO. IF YOU CANNOT SUBMIT CLIENT DATA THROUGH ESP, YOU CAN STILL USE ESP TO DOWNLOAD RELEVANT DOCUMENTS IN SUPPORT OF YOUR TRADITIONAL RECLAIM. HOWEVER, A FEE MAY BE ASSESSED IN THE FUTURE SHOULD YOU FILE OUTSIDE OF ESP.
ARE THE EXHIBITS AVAILABLE IN WORD FORMAT?	YES, YOU MAY REQUEST THESE DOCUMENTS BY EMAILING: GERMANYESP@GLOBETAX.COM.
DOES THE LONG FORM PROCESS HAVE A MINIMUM POSITION REQUIREMENT PER BENEFICIAL OWNER?	YES, LONG FORM CLAIMS MUST RECLAIM AT LEAST \$50.00 TO COVER THE COST OF FILING.
WILL DEUTSCHE BANK/GLOBETAX ACCEPT CLAIMS FILED DIRECTLY TO THEM BY BENEFICIAL OWNERS?	NO. DEUTSCHE BANK/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 REC- ORD 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 RE- TURNED TO THE BENEFICIAL OWNER.
WILL I BE PAID THROUGH DTC FOR CLAIMS SUBMITTED THROUGH THE LONG-FORM PROCESS?	NO, YOU WILL BE PAID BY CHECK OR ACH.

## APPENDIX 1

ENTITY CODE	DESCRIPTION	EXAMPLES (NOT COMPLETE LIST)
01	NATURAL PERSON	INDIVIDUAL
02	ASSOCIATIONS WITHOUT INDEPENDENT LEGAL EXISTENCE	PARTNERSHIPS TRUSTS LLC LIMITED LIABILITY COMPANY
03	LEGAL PERSON / SUPRANATIONAL ORGANIZATIONS	CORPORATIONS INC. LTD. CENTRAL BANKS S.A. AG FOUNDATION/ENDOWMENT (IF NOT TAX EXEMPT) UCIT INTERNATIONAL MONETARY FUND BANK FOR RECONSTRUCTION AND DEVELOPMENT PLC PTY.LTD B.V./NETHERLANDS N.V./NETHERLANDS SICAV/LUXEMBOURG FCP/LUXEMBOURG UK TRUSTS UNDER CERTAIN CONDITIONS (SUBJECT-TO-TAX IN THE UK) SICAV/BELGIUM MASSACHUSETTS BUSINESS TRUST
04	INVESTMENT FUNDS	RIC (USA) ITM (JAPAN) UK INVESTMENT FUND OPEN ENDED INVESTMENT COMPANY (OEIC)/UK AUTHORISED UNIT TRUST (AUT)/UK INVESTMENT TRUST COMPANY (ITC)/UK UNAUTHORISED UNIT TRUST (UUT)/UK SICAV/FRANCE FIM, FIMF, FIAMM, SIM, SICAV, SIMCAV/SPAIN
05	CHARITIES / FOUNDATIONS	USA: TAX EXEMPT AS PER ART. 27 DTA GERMANY/USA ART. 501C(3)
06	SOVEREIGN ENTITIES	GOVERNMENT OF ...;
07	PENSION PLANS / RETIREMENT ACCOUNTS	USA: 401(A); 408(K); 408(A); 408(P); 403(A); 403(B); 457(B)



## APPENDIX 2

<b>TREATY RATE MATRIX</b>			
RATE	COUNTRY		
<b>10%</b>	BOLIVIA	CHINA	GEORGIA
	INDIA	MONGOLIA	THE NETHERLANDS (PEN)
	TAIWAN	UKRAINE	UNITED ARAB EMIRATES
	UNITED KINGDOM (PEN)		
<b>15%</b>	ALBANIA	ALGERIA	ARGENTINA
	ARMENIA	AUSTRALIA	AUSTRIA
	AZERBAIJAN	BANGLADESH	BELARUS
	BELGIUM	BOSNIA-HERZEGOVINA	BULGARIA
	CANADA	CROATIA	CYPRUS
	CZECH REPUBLIC	DENMARK	ECUADOR
	EGYPT	ESTONIA	FINLAND
	FRANCE	GHANA	HUNGARY
	INDONESIA	IRELAND	ITALY
	IVORY COAST	JAMAICA	JAPAN
	KAZAKHSTAN	KENYA	KOREA, REPUBLIC OF (S)
	KOSOVO	KUWAIT	KYRGYZSTAN
	LATVIA	LIBERIA	LIECHTENSTEIN
	LITHUANIA	LUXEMBOURG	LUXEMBOURG (REIT)
	MACEDONIA	MALAYSIA	MALTA
	MAURITIUS	MEXICO	MOLDOVA
	MONTENEGRO	NAMIBIA	NETHERLANDS
	NEW ZEALAND	NORWAY	PAKISTAN
	PHILIPPINES	POLAND	PORTUGAL
	ROMANIA	RUSSIA	SERBIA
	SINGAPORE	SLOVAK REPUBLIC	SLOVENIA
	SOUTH AFRICA	SPAIN	SRI LANKA
	SWEDEN	SWITZERLAND	SWITZERLAND (REIT)
	TAIWAN	TAJIKISTAN	TUNISIA
	TURKEY	TURKMENISTAN	UNITED ARAB EMIRATES (REIT)
	UNITED KINGDOM	UNITED KINGDOM (CHA)	UNITED STATES OF AMERICA
URUGUAY	UZBEKISTAN	VENEZUELA	
VIETNAM	ZAMBIA		
<b>20%</b>	IRAN	THAILAND	TRINIDAD AND TOBAGO
	ZIMBABWE		
<b>25%</b>	GREECE	ISRAEL	
<b>26.375%</b>	NON-TREATY COUNTRIES		

EXHIBIT 1

COVER LETTER REQUIRED FOR GERMAN TAX RECLAIM FILINGS TO BE PREPARED ON THE **DTC PARTICIPANT'S LETTERHEAD**

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**Deutsche Bank**  
c/o GlobeTax

One New York Plaza, Floor 34 New York, NY 10004 – 2205 Attn: GERMANY

Enclosed please find documents in support of the withholding tax reclaims which we have submitted on behalf of our client (s) who have had excess tax withheld on German ADRs. We, **(DTC Participant Name)**, also identified as DTC participant number **(xxxx)**, hereby state that each beneficial owner cited below held the respective amount of shares on the ADR record date of **5/23/2012** for the security **SAP AG; (CUSIP# 803054204)** and by filing this claim we acknowledge that we will not file a claim directly with the German Federal Tax Office (BZSt) for the holders listed below.

Below is the list of **Beneficial Owners** holding a total of **[Total # ADRS Claimed]** ADRs. The ratio is **1 ORD to 1 ADR**. As required, all necessary documents are enclosed.

The information is as follows:

	Full Legal Name as it appears on Form 6166 or COR	Street Address	City, State, Zip Code, Country	Legal Entity Type***	SSN# / TIN#	ADRs	ORDs	Reclaim %
1				See Note***				
2								
3								
4								

**PLEASE E-MAIL GERMANYESP@GLOBETAX.COM AN EXCEL SPREADSHEET OF BREAKDOWN ABOVE IF IT CONTAINS MORE THAN 7 BENEFICIAL OWNERS.**

\*\*\***Note:** This must be one of seven possible choices as defined by the German Tax Authorities, the types are: Natural Persons, Associations without independent legal existence, Legal person/supranational organizations, Investment Funds, Charities, Sovereign entities, Pension Funds

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I / We certify that to the best of my knowledge the above beneficial owners are eligible for the preferential rates as stated herein and I declare that I have performed all the necessary due diligence to satisfy myself as to the accuracy of the information submitted to me by these beneficial owners.

Deutsche Bank is not liable for failure to secure the refund and any funds erroneously received shall be immediately returned to Deutsche Bank, including any interest, additions to tax or penalties thereon. This is not tax advice. Please consult your tax advisor.

Sincerely,

\_\_\_\_\_  
[Signature of Authorized DTC Participant Signatory]

\_\_\_\_\_  
[Date]

\_\_\_\_\_  
[Name, Title & Phone Number of Authorized DTC Participant Signatory]

## EXHIBIT 2

### AUTHORIZATION LETTER REQUIRED FOR GERMAN TAX RECLAIM FILINGS

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#### Declaration and Authorization

##### Final Beneficiary Details

Name: \_\_\_\_\_

Address: \_\_\_\_\_

Country of Residence: \_\_\_\_\_

Tax ID # (USA Only): \_\_\_\_\_

Custodian (Participant): \_\_\_\_\_

##### Authorization

The final beneficiary has authorized **Deutsche Bank Trust Company Americas and/or their agents** to submit applications for the reimbursement of German withholding tax in their name and on their behalf and to receive any corresponding refund amounts on their behalf, and to undertake any necessary communication with the German Tax Authority (GTA) in their name.

##### Declaration

The final beneficiary declares that:

- they are aware of and comply with the conditions of the double taxation agreement in force;
- they are entitled to the respective capital proceeds;
- they reside in the country of residence according to double taxation agreement in force;
- they do not maintain any abode/residence, habitual residence or head office in Germany;
- the proceeds do not accrue to the benefit of any permanent establishment or fixed utility in Germany;
- they oblige themselves, as a result of his participation in the DTV procedure, not to submit any separate/supplemental refund applications;
- they oblige themselves to repay any amounts in respect of which the GTA requests repayment on account of subsequent knowledge acquired and which were erroneously credited within the context of the DTV procedure;
- they are aware that the GTA can, in the event of spot checks, request the presentation of a certificate of residence or directly exchange information with the local Taxation Authorities in his country of residence.

##### Additional declarations subject to country of residence and legal form:

*Valid for USA residents only:*

- a FORM 6166 "Certificate of filing a tax return" can be presented / submitted whereby the Tax Year on the form is the same as the calendar year in which the dividend payment occurred and the legal form given by him is confirmed thereon;

*Valid only for parties eligible for reimbursement with country of residence Great Britain:*

- the proceeds are subject to tax in Great Britain;

*Valid only for Luxembourg corporations:*

- the corporation was not founded according to the Luxembourg holding tax law of 1929;

*Valid only for parties eligible for reimbursement with country of residence Switzerland and legal form 'natural person':*

- he is, in accordance with Swiss taxation law, subject to those Swiss taxes generally levied by the government, cantons and parishes in terms of all generally taxable income proceeds;
- he is a Swiss citizen or - in the case of the non-existence of Swiss citizenship was not subject to unlimited taxation in Germany either in the year in which the accrual of the capital proceeds took place or in the preceding five calendar years;

*Valid only for parties eligible for reimbursement with country of residence Switzerland and legal form 'corporation':*

- the corporation is predominantly Swiss-governed and that the provisions contained in Article 23 Section 1 of the German-Swiss double taxation agreement as regards the prevention of the improper use of agreement benefits are being observed.

*Valid only for parties eligible for reimbursement with country of residence Cyprus, Indonesia, Israel, Jamaica, Malaysia, Malta, Singapore, Trinidad, Tobago:*

- a confirmation that the respective earnings have been transferred to the country of residence (repatriation) can be presented submitted for the specific payment.

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**Date, Place**

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**Signature of party eligible for reimbursement**

**EXHIBIT 3**

PARTICIPANT AUTHORIZATION LETTER REQUIRED FOR LONG FORM GERMAN TAX RECLAIM FILINGS. THIS DOCUMENT MUST BE PLACED ONTO THE **DTC PARTICIPANT'S LETTERHEAD**

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\_\_\_\_\_  
**[DATE]**

**[RELEVANT DEPOSITARY]**

c/o Globe Tax Services, Inc. One New York Plaza – 34<sup>th</sup> Floor  
New York, NY 10004-1936, USA

Enclosed please find my withholding tax reclamation documents, for the ADR record date of **[ADR RECORD DATE]** for the security **[ISSUE NAME]**, **[CUSIP#]**.

By requesting **[RELEVANT DEPOSITARY]** to perform reclaim services, the undersigned certifies that the taxpayer holds (or held at the time of the dividend distribution) shares of **[ISSUE NAME]** in the form of American Depositary Receipts. The taxpayer's share represents less than 10% of the total share capital of **[ISSUE NAME]** and is not held in connection with a permanent establishment in Germany. The undersigned authorized **[RELEVANT DEPOSITARY]** to claim a refund of taxes withheld in connection with the dividend distributions of **[ISSUE NAME]** and to receive the refund on the taxpayer's behalf.

**[RELEVANT DEPOSITARY]** is not liable for failure to secure the refund and any funds erroneously received shall be immediately returned to **[RELEVANT DEPOSITARY]**, including any interest, additions to tax or penalties thereon. This is not tax advice. Please consult your tax advisor.

**[DTC PARTICIPANT NAME]** authorizes **[RELEVANT DEPOSITARY]** to lodge this claim on my behalf and will not make any claim directly to the German tax authorities.

Participant Name: \_\_\_\_\_

Payment Address: \_\_\_\_\_

City, State, Zip: \_\_\_\_\_

Contact Name: \_\_\_\_\_

Contact Number: \_\_\_\_\_

Sincerely,

\_\_\_\_\_  
Authorized Signature

\_\_\_\_\_  
Date

**EXHIBIT 5 – ZUSATZERKLÄRUNG**  
**Supplementary Questionnaire for Tax-Transparent Entities**  
**FOR FILERS NOT RESIDENT IN THE UNITED STATES**

Declaration for:

- Investment funds that are organized as tax transparent entities but are still eligible for an indirect treaty entitlement for the shareholders/beneficiaries
- Other tax transparent entities (e.g. partnerships), which are eligible for an indirect treaty entitlement for the shareholders/beneficiaries

\_\_\_\_\_ Name, address of the recipient of the capital gains

Legal form of entity:  Partnership  
 Other: \_\_\_\_\_

(All the following figures should be as of the end of the last fiscal year.)

End of the last fiscal year: _____	<u>Total</u>	<u>In %</u>
1.1 Number of shares/investment certificates issued:	_____	100 %
1.2 Of these, the number of certificates held by residents of the country where the fund/entity is located:	_____	____ %
2.1 Total number of certificate holders:	_____	100 %
2.2 Of these, the number of certificate holder resident in the country in which the fund/entity is located:	_____	____ %
3. Portion of total assets which consist of German securities:		____ %

**Note:**

The proper (partial) entitlement under the tax treaty is determined using the percentage from 1.2. For simplification, percentages can be rounded up to the next whole number (e.g. 95.3% → 96%).

I confirm that all information provided in this attachment is correct and complete to the best of my knowledge and belief.

_____ Place	_____ Date	_____ Signature of representative of fund/company
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# EXHIBIT 5 – ZUSATZERKLÄRUNG USA

## Supplementary Questionnaire for Tax-Transparent Entities UNITED STATES ONLY

### Declaration for American

- Investment funds that are organized as a corporation (in particular, those organized as Regulated Investment Companies),
- Investment funds that are organized as tax-transparent entities, but are still eligible for a (partial) entitlement under the terms of Article 4, paragraph 1, subparagraph b of the USA/Germany Double Taxation Treaty
- Other tax-transparent entities organized as trusts, estates, or partnerships.

\_\_\_\_\_  
Name, address of the recipient of the capital gains

Legal form of entity:  Corporation       Trust       Partnership

Other: \_\_\_\_\_

- |  | <u>YES</u>               | <u>NO</u>                |
|--|--------------------------|--------------------------|
| 1. The recipient of the capital gains is organized as a Regulated Investment Company (RIC)   | <input type="checkbox"/> | <input type="checkbox"/> |
| 2. If question 1 was answered with NO:<br>Due to other considerations, the income is not taxed at the entity level but rather is taxed at the level of its beneficiaries/investors | <input type="checkbox"/> | <input type="checkbox"/> |

If question 1 or 2 was answered with YES:

(All the following figures should be as of the end of the last fiscal year.)

End of the last fiscal year: \_\_\_\_\_

- |   | <u>Total</u> | <u>In %</u> |
|---|--------------|-------------|
| 3.1 Number of shares/investment certificates issued:  | _____        | 100 %       |
| 3.2 Of these, the number of certificates held by U.S. residents                                       | _____        | _____ %     |
| 4.1 Total number of certificate holders   | _____        | 100 %       |
| 4.2 Of these, the number of certificate holders resident in the U.S.                                  | _____        | _____ %     |
| 5. If the entity is an investment fund:<br>Portion of total assets which consist of German securities |              | _____ %     |

### Note:

The proper (partial) entitlement under the tax treaty is determined using the percentage from 1.2. For simplification, percentages can be rounded up to the next whole number (e.g. 95.3% → 96%).

I confirm that all information provided in this attachment is complete and correct to the best of my knowledge and belief.

\_\_\_\_\_  
Place

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of representative of fund/company

## EXHIBIT 6



# Erklärung/Declaration

Hiermit erkläre ich,  
I herewith declare,

\_\_\_\_\_  
(Name)

\_\_\_\_\_  
(Strasse/Street)

\_\_\_\_\_  
(Ort/City)

im Namen des Erstattungsberechtigten,  
on behalf of the beneficiary entitled to the refund,

\_\_\_\_\_  
(Name)

\_\_\_\_\_  
(Strasse/Street)

\_\_\_\_\_  
(Ort/City)

dass es sich bei dem Erstattungsberechtigten nach § 50d Abs. 1 EStG um einen amerikanischen Pensionsfonds i.S.d. Art. 10 Abs. 3 Buchstabe b des Doppelbesteuerungsabkommens mit den USA (DBA USA) i.d.F. des Revisionsprotokolls vom 01.06.2006 handelt.

that the beneficiary entitled to the refund is, according to Article 50d, paragraph 1 of the Income Tax Act ("Einkommensteuergesetz"/EStG), an American pension fund within the meaning of Article 10, paragraph 3 subparagraph b of the Double Taxation Agreement concluded with the USA (DTA USA) in the form of the revising protocol of June 1,2006.

Gem. der Definition Pensionsfonds im Art. 10 Abs. 11 des DBA USA versteht man darunter Personen, die in den USA vorwiegend errichtet und unterhalten werden, um Ruhegehalter oder ähnliche Vergütungen, einschließlich Sozialversicherungsleistungen, Invalidenrenten und Witwenrenten, zu verwalten oder zu gewähren oder zugunsten einer oder mehrerer dieser Personen Einkünfte zu erzielen. Hinsichtlich dieser Tätigkeiten müssen sie in den USA von der Steuer befreit sein.

According to the definition given in Article 10, paragraph 11 of the DTA USA, a pension fund refers to persons established and maintained in the USA primarily to administer or provide pensions or other similar remuneration, including social security payments, disability pensions and widow's pensions or to earn income for the benefit of one or more such persons. With respect to the activities described in subparagraph b) in this paragraph, they must exempt from tax in the USA.

\_\_\_\_\_  
(Datum und Unterschrift/Date and Signature)

Note: the German text is the legally binding version.



**EXHIBIT 8**

PAYMENT CERTIFICATION REQUIRED FOR LONG FORM GERMAN TAX RECLAIM FILINGS. THIS DOCUMENT MUST BE PLACED ONTO THE **DTC PARTICIPANT'S LETTERHEAD**

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**CREDIT ADVICE**

**[DTC PATICIPANT NAME]** hereby certifies that the following beneficial owner holding the security **[ISSUE NAME]**; **[CUSIP]** was a holder of record on **[ADR RECORD DATE]**. The beneficial owner was paid the dividend less the **[WITHHOLDING TAX %]** withholding tax at source and is entitled to the **[RECLAIM %]** tax refund stipulated under the provisions of the double taxation Convention between the Federal Republic of Germany and **[COUNTRY OF DOMICILE]**.

We hereby certify that we have paid the dividend to the beneficial owner of the following securities on **[ORD PAYDATE]**.

Account legal name and address: **[BENEFICIAL OWNER NAME] [BENEFICIAL OWNER ADDRESS]**

Security Name: \_\_\_\_\_

ISIN: (ORD) \_\_\_\_\_

Pay Date: (ORD) \_\_\_\_\_

Ratio: (ADR to FO) \_\_\_\_\_

Shares (ADR): \_\_\_\_\_

Shares (ORD): \_\_\_\_\_

Dividend rate per share (EUR): \_\_\_\_\_

Gross Dividend (EUR): \_\_\_\_\_

Withholding tax amount (EUR): \_\_\_\_\_

Withholding tax rate: \_\_\_\_\_

Amount of claim (EUR): \_\_\_\_\_

Reclaim Tax Rate: \_\_\_\_\_

Authorized Signature: \_\_\_\_\_

Date: