



B #:	5711-17
Date:	April 24, 2017
To:	All Participants
Category:	Dividends
From:	International Services
Attention:	Operations, Reorg & Dividend Managers, Partners & Cashiers
Subject:	<u>Tax Relief</u> – Country: ITALY ENI CUSIP: 26874R108 <u>Record Date:</u> 04/25/2017 <u>Payable Date:</u> 05/08/2017 <u>CA Web Instruction Deadline:</u> 05/19/2017 8:00 P.M.

Participants can use DTC’s Corporate Actions Web (CA Web) service to certify all or a portion of their position entitled to the applicable withholding tax rate. Participants are urged to consult TaxInfo respectively before certifying their instructions over CA Web.

Important: Prior to certifying tax withholding instructions, participants are urged to read, understand and comply with the information in the Legal Conditions category found on TaxInfo over the CA Web.

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

Important Legal Information: *The Depository Trust Company (“DTC”) does not represent or warrant the accuracy, adequacy, timeliness, completeness or fitness for any particular purpose of the information contained in this communication, which is based in part on information obtained from third parties and not independently verified by DTC and which is provided as is. The information contained in this communication is not intended to be a substitute for obtaining tax advice from an appropriate professional advisor. In providing this communication, DTC shall not be liable for (1) any loss resulting directly or indirectly from mistakes, errors, omissions, interruptions, delays or defects in such communication, unless caused directly by gross negligence or willful misconduct on the part of DTC, and (2) any special, consequential, exemplary, incidental or punitive damages. To ensure compliance with Internal Revenue Service Circular 230, you are hereby notified that: (a) any discussion of federal tax issues contained or referred to herein is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties that may be imposed under the Internal Revenue Code; and (b) as a matter of policy, DTC does not provide tax, legal or accounting advice and accordingly, you should consult your own tax, legal and accounting advisor before engaging in any transaction.*

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Non-Confidential





ENI has announced a cash dividend and BNY Mellon acts as Depository for the Depository Receipt (“DR”) 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, Fees, Representations and Indemnification** below.

On Depository Receipt Pay Date, all holders will receive this dividend net of the full Italian statutory withholding tax rate of **26%** with the possibility to reclaim through the Quick Refund or Long Form process.

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DIVIDEND EVENT DETAILS	
COUNTRY OF ISSUANCE	ITALY
ISSUE	ENI
CUSIP#	26874R108
UNDERLYING ISIN	IT0003132476
DEPOSITARY	BNY MELLON
DR RECORD DATE	APRIL 25, 2017
ORD PAY DATE	APRIL 26, 2017
DR PAY DATE	MAY 8, 2017
RATIO (DR to ORD)	1:2
ORD RATE	EUR 0.40
STATUTORY WITHHOLDING RATE	26%
	DOUBLE CLICK ICON BELOW TO DOWNLOAD 

PLEASE NOTE:

1. THE TAX RATE FOR ELIGIBLE EU/EEA CORPORATE ENTITIES WAS CHANGED TO 1.20%
2. ELIGIBLE EU/EEA PENSION FUNDS MAY APPLY FOR EXEMPTION WITH THE REQUIRED SUPPORTING DOCUMENTATION

FEES & DEADLINES

FILING METHOD	PAYMENT METHOD	CUSTODIAL FEE	DSC FEE	MINIMUM FEE PER BENEFICIAL OWNER	FINAL SUBMISSION DEADLINE (ESP)
QUICK REFUND	VIA DTC	\$15.00	UP TO \$0.0075 PER DR	\$25.00	May 19, 2017
LONG FORM	VIA CHECK OR ACH	\$10.00	UP TO \$0.0075 PER DR	\$25.00	February 1, 2021

MINIMUM SHARE AMOUNT REQUIRED TO FILE A CLAIM (CLAIMS RECEIVED BELOW THE FILING MINIMUM WILL BE REJECTED)

BENEFICIAL OWNER'S WITHHOLDING TAX RATE OF ENTITLEMENT	RATE OF RECLAIM	MINIMUM # OF DRs REQUIRED TO FILE (BASED OFF AN APPROX. EXCHANGE RATE OF 1.0573 EURO PER USD)
0.00%	26.00%	192 DRS
1.20%	24.80%	201 DRS
10.00%	16.00%	312 DRS
11.00%	15.00%	335 DRS
15.00%	11.00%	454 DRS
20.00%	6.00%	835 DRS
25.00%	1.00%	5,000 DRS

Agreements, Fees, Representations and Indemnification of Participants and Beneficial Owners

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. BNY Mellon undertakes no duty or obligation to provide this service, and may reject or decline any or all proposed electing participants or holders in its sole discretion. We hereby accept and agree to pay the fees of BNY Mellon of up to \$0.0075 per Depository Receipt for Quick Refund, or up to \$0.0075 per Depository Receipt for Long Form (with a minimum of \$25), and any other charges, fees or expenses payable by or due to BNY Mellon 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 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 acknowledge that fees paid to BNY Mellon may be shared with its agents and affiliates.

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, and potential audits 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. Participants and/or investors should seek advice based upon their own particular circumstances from an independent tax advisor.

We certify that to the best of our knowledge each of the beneficial owners identified are eligible for the preferential rates as stated 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 tax relief. 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.


ELIGIBILITY MATRIX – QUICK REFUND

RATE DESCRIPTION	RECLAIM RATE	ELIGIBLE RESIDENTS	DOCUMENTATION REQUIRED	SIGNATURE REQUIRED
UNFAVORABLE - 26%	0%	NON-TREATY COUNTRIES AND ENTITIES NOT MENTIONED AS FAVORABLE OR EXEMPT BELOW	NONE	1. N/A
FAVORABLE - 25%	1%	(INDIVIDUALS & NON-INDIVIDUALS) INDIA, PAKISTAN	<ol style="list-style-type: none"> 1. ORIGINAL COVER LETTER (ESP-GENERATED) 2. ORIGINAL CERTIFICATE OF RESIDENCY 3. ORIGINAL FORM DIV.I_09.01 (FOR USE BY INDIVIDUALS) (ESP-GENERATED) 4. ORIGINAL FORM DIV.C_09.01 (FOR USE BY NON-INDIVIDUALS) (ESP-GENERATED) 	<ol style="list-style-type: none"> 1. YES – DTC PARTICIPANT 2. LOCAL TAX AUTHORITIES 3. YES – BENEFICIARY OR LEGAL REPRESENTATIVE
FAVORABLE - 20%	6%	(INDIVIDUALS & NON-INDIVIDUALS) THAILAND, TRINIDAD AND TOBAGO	<ol style="list-style-type: none"> 1. ORIGINAL COVER LETTER (ESP-GENERATED) 2. ORIGINAL CERTIFICATE OF RESIDENCY 3. ORIGINAL FORM DIV.I_09.01 (FOR USE BY INDIVIDUALS) (ESP-GENERATED) 4. ORIGINAL FORM DIV.C_09.01 (FOR USE BY NON-INDIVIDUALS) (ESP-GENERATED) 	<ol style="list-style-type: none"> 1. YES – DTC PARTICIPANT 2. LOCAL TAX AUTHORITIES 3. YES – BENEFICIARY OR LEGAL REPRESENTATIVE
FAVORABLE - 15%	11%	(INDIVIDUALS & NON-INDIVIDUALS) ALGERIA, ARGENTINA, AUSTRALIA, AUSTRIA, BANGLADESH, BELARUS, BELGIUM, BRAZIL, CANADA, CHILE, COTE D'IVOIRE, CROATIA, CYPRUS, CZECH REPUBLIC, DENMARK, ECUADOR, ESTONIA, FINLAND, FRANCE, GERMANY, GHANA, GREECE, ICELAND, INDONESIA, IRELAND, ISRAEL, JAPAN, KAZAKHSTAN, KOREA (REPUBLIC OF), LATVIA, LITHUANIA, LUXEMBOURG, MACEDONIA (FORMER YUGOSLAVE REPUBLIC OF), MALTA, MAURITIUS, MEXICO, MOROCCO, MOZAMBIQUE, NETHERLANDS, NEW ZEALAND, NORWAY, PHILIPPINES, PORTUGAL, QATAR, SENEGAL, SLOVAKIA, SLOVENIA, SOUTH AFRICA, SPAIN, SRI LANKA, SWEDEN, SWITZERLAND, TUNISIA, TURKEY, UGANDA, UKRAINE, UNITED ARAB EMIRATES, UNITED KINGDOM, UNITED STATES, VIETNAM, ZAMBIA	<ol style="list-style-type: none"> 1. ORIGINAL COVER LETTER (ESP-GENERATED) 2. ORIGINAL CERTIFICATE OF RESIDENCY OR IRS FORM 6166 3. ORIGINAL FORM DIV.I_09.01 (FOR USE BY INDIVIDUALS) (ESP-GENERATED) 4. ORIGINAL FORM DIV.C_09.01 (FOR USE BY NON-INDIVIDUALS) (ESP-GENERATED) 	<ol style="list-style-type: none"> 1. YES – DTC PARTICIPANT 2. LOCAL TAX AUTHORITIES OR IRS REPRESENTATIVE 3. YES – BENEFICIARY OR LEGAL REPRESENTATIVE

FAVORABLE - 11%	15%	EU/EEA PENSION FUNDS (See "Appendix A")	<ol style="list-style-type: none"> 1. ORIGINAL COVER LETTER (ESP-GENERATED) 2. ORIGINAL EU PENSION CERTIFICATE OF RESIDENCY 3. ORIGINAL FORM CLAIM_PENSION FUNDS (ESP-GENERATED) 	<ol style="list-style-type: none"> 1. YES – DTC PARTICIPANT 2. LOCAL TAX AUTHORITIES 3. YES – BENEFICIARY OR LEGAL REPRESENTATIVE
FAVORABLE - 10%	16%	(INDIVIDUALS & NON-INDIVIDUALS) ALBANIA, ARMENIA, BOSNIA-HERZEGOVINA, BULGARIA, CHINA, ETHIOPIA, GEORGIA, HUNGARY, JORDAN, MALAYSIA, OMAN, POLAND, ROMANIA, RUSSIAN FEDERATION, SAUDI ARABIA, SERBIA, SYRIA, SINGAPORE, TAIWAN, TANZANIA, UZBEKISTAN, VENEZUELA	<ol style="list-style-type: none"> 1. ORIGINAL COVER LETTER (ESP-GENERATED) 2. ORIGINAL CERTIFICATE OF RESIDENCY 3. ORIGINAL FORM DIV.I_09.01 (FOR USE BY INDIVIDUALS) (ESP-GENERATED) 4. ORIGINAL FORM DIV.C_09.01 (FOR USE BY NON-INDIVIDUALS) (ESP-GENERATED) 	<ol style="list-style-type: none"> 1. YES – DTC PARTICIPANT 2. LOCAL TAX AUTHORITIES 3. YES – BENEFICIARY OR LEGAL REPRESENTATIVE
FAVORABLE - 1.20%	24.80%	EU/EEA CORPORATE ENTITIES (See "Appendix A")	<ol style="list-style-type: none"> 1. ORIGINAL COVER LETTER (ESP-GENERATED) 2. ORIGINAL EU CORPORATE CERTIFICATE OF RESIDENCY 3. ORIGINAL FORM DIV.C_09.01 (ESP-GENERATED) 	<ol style="list-style-type: none"> 1. YES – DTC PARTICIPANT 2. LOCAL TAX AUTHORITIES 3. YES – BENEFICIARY OR LEGAL REPRESENTATIVE
EXEMPT - 0%	26%	U.S. GOVERNMENTAL ENTITIES WITH A FORM 6166 THAT SPECIFIES THE RESIDENT AS "THE STATE"	<ol style="list-style-type: none"> 1. ORIGINAL COVER LETTER (ESP-GENERATED) 2. ORIGINAL IRS FORM 6166 FOR STATE ENTITIES 3. ORIGINAL FORM DIV.USA (ESP-GENERATED) 	<ol style="list-style-type: none"> 1. YES – DTC PARTICIPANT 2. IRS REPRESENTATIVE 3. YES – BENEFICIARY OR LEGAL REPRESENTATIVE
EXEMPT - 0%	26%	KUWAIT INDIVIDUALS & NON-INDIVIDUALS	<ol style="list-style-type: none"> 1. ORIGINAL COVER LETTER (ESP-GENERATED) 2. ORIGINAL CERTIFICATE OF RESIDENCY 3. ORIGINAL FORM DIV.I_09.01 (FOR USE BY INDIVIDUALS) (ESP-GENERATED) 4. ORIGINAL FORM DIV.C_09.01 (FOR USE BY NON-INDIVIDUALS) (ESP-GENERATED) 	<ol style="list-style-type: none"> 1. YES – DTC PARTICIPANT 2. LOCAL TAX AUTHORITIES 3. YES – BENEFICIARY OR LEGAL REPRESENTATIVE

DESCRIPTION OF VARIOUS DOCUMENTATION	
DOCUMENT NAME	DESCRIPTION
COVER LETTER (EXHIBIT 1)	Listing of Beneficial Owner information.
FORM DIV.I_09.01 (EXHIBIT 2)	<p>These forms MUST be printed out as SINGLE PAGE/ DOUBLE SIDED DOCUMENTS.</p> <p>The "BENEFICIAL OWNER" section of FORM DIV.I_09.01, FORM DIV.C_09.01, FORM CLAIM_PENSION FUNDS, and FORM DIV.USA (third parties) 11.01 must contain an ORIGINAL signature from the beneficial owner.</p> <p>NOTE: If a signature cannot be obtained from the beneficial owner, a representative may sign on their behalf if a notarized ORIGINAL Power of Attorney signed by the beneficial owner to the entity signing on their behalf is provided. Alternatively a notarized copy of EITHER a Power of Attorney (POA), a Trust Agreement, or a Custody Agreement signed by the beneficial owner to the entity signing on their behalf can be supplied along with an ORIGINAL Self Certified Power of Attorney, printed on the letterhead of the signing entity authorized. The Self Certified POA should be signed by the individual who will be signing the forms on the beneficial owner's behalf.</p>
FORM DIV.C_09.01 (EXHIBIT 3)	
FORM CLAIM_PENSION FUNDS (EXHIBIT 4)	
FORM DIV.USA (third parties) 11.01 (EXHIBIT 5)	
EU CORPORATE-CERTIFICATE OF RESIDENCY	An original COR for the tax year of the dividend provided that that form is dated prior to the pay date and mentions that the beneficial owner is subject to "Article 2 of Directive 90/435/EEC July 1990".
EU PENSION - CERTIFICATE OF RESIDENCY	An original COR for the tax year of the dividend provided that that form is dated prior to the pay date and explicitly states that the beneficial owner is a pension.
IRS FORM 6166 FOR NON STATE ENTITIES	Must be certified for the tax year of the dividend, dated prior to the local pay date, and contain the wording "...for purposes of U.S. taxation".
IRS FORM 6166 FOR STATE ENTITIES	Must be certified for the tax year of the dividend, dated prior to the local pay date, and contain the wording "...for purposes of U.S. taxation".
LIMITED POWER OF ATTORNEY (EXHIBIT 6)	If the POA is signed by the Broker, trust agreement or notarized limited POA must also be submitted

CONTACT DETAILS	
PRIMARY CONTACT	EMILIE KOZOL
DOMESTIC PHONE (U.S.)	1-800-915-3536
DOMESTIC FAX (U.S.)	1-800-985-3536
INTERNATIONAL PHONE	1-212-747-9100
INTERNATIONAL FAX	1-212-747-0029
EMAIL ADDRESS	EMILIE_KOZOL@GLOBETAX.COM
GROUP EMAIL	ITALYESP@GLOBETAX.COM
COMPANY	GLOBETAX SERVICES INC.
STREET ADDRESS	ONE NEW YORK PLAZA, 34 TH FLOOR
CITY/STATE/ZIP	NEW YORK, NY 10004
ADDITIONAL CONTACTS	LAURA GALLO



powered by **GLOBETAX**

BNY Mellon offers 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 BNY Mellon and creates applicable documentation on the Participants behalf.

Submit the data online through the web site below, print out the document on letterhead, sign, and mail to BNY Mellon / GlobeTax.

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

<https://ESP.GlobeTax.com>

Please contact support@globetax.com at 212-747-9100 if you have any questions about this process.

FREQUENTLY ASKED QUESTIONS (FAQs)

QUICK REFUND QUESTIONS

How do I obtain the required documentation for long form reclaims?	Please contact ItalyESP@globetax.com regarding interest in submitting a long form reclaim. We can provide you with the necessary documentation and list of requirements that each custodian has to file a complete reclaim.
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 DR Depository banks an optional process?	Yes, this is a discretionary, optional service.
Are the quick refund and long form processes 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. BNY Mellon undertakes no duty or obligation to provide this service, and may reject or decline any or all proposed electing participants or holders in its sole discretion. Fees will be charged for this assistance service of up to \$0.0075 per DR for quick refund and standard long form reclaims with a minimum of \$25.00 and a custodial charge up to \$15.00 for quick refund and \$10.00 for standard long form. Reclaims received post deadline cannot be assured and may be subject to a per beneficiary fee as well as other charges, fees or expenses payable by or due to BNY Mellon or its agents, including the custodian or tax authorities. In addition, charges may apply to any long form claims rejected or not accepted by the custodian. Fees paid to BNY Mellon may be shared with its agents and affiliates.





Warning and Disclaimer:

BNY Mellon will not be responsible for the truth or accuracy of any submissions received by it and all Participants and holders, whether or not following the procedures set forth herein or otherwise submitting any information, agree to indemnify and hold harmless BNY Mellon and its agents for any and all losses, liabilities and fees (including reasonable fees and expenses of counsel) incurred by any of them in connection herewith or arising herefrom. BNY Mellon and its agents will be relying upon the truth and accuracy of any and all submissions received by them in connection with the tax relief process and shall hold all participants and DR holders liable and responsible for any losses incurred in connection therewith or arising there from. There is no guarantee that the applicable tax authorities will accept submissions for relief. Neither BNY Mellon nor its agents shall be responsible or liable to any holders of DRs in connection with any matters related to, arising from, or in connection with the tax relief process described herein. See also **“Agreements, Fees, Representations and Indemnification”** above.

All tax information contained in this Important Notice is based on a good faith compilation of information obtained and received from multiple sources. The information is subject to change. Actual deadlines frequently vary from the statutory deadlines because of local market conditions and advanced deadlines set by local agents. To mitigate risk it is strongly advised that DTC Participants file their claims as soon as possible as the depository and/or their agents will not be liable for claims filed less than six months before the specified deadline. In the event that local market rules, whether implemented by a local agent or a Tax Authority, conflict with the information provided in the important notice, either prior to or after publication, the local market rules will prevail.

FORMS AND ATTACHMENTS

**Double click on respective icon to view attachment.*

EXHIBIT 1 – COVER LETTER <i>**For Non-ESP users ONLY</i>	EXHIBITS 2, 3, 4 AND 5 <i>**For Non-ESP users ONLY</i>	APPENDIX A – EU/EEA COUNTRIES <i>**For Non-ESP users</i>	EXHIBIT 6 – POWER OF ATTORNEY
 EXHIBIT 1.pdf	 EXHIBITS 2, 3, 4, 5.pdf	 APPENDIX A.pdf	 EXHIBIT 6.pdf