



*Important Notice*  
The Depository Trust Company

|            |  |
|------------|--|
| B #:       | 10370-19   |
| Date:      | February 19, 2019  |
| To:        | All Participants   |
| Category:  | Dividends  |
| From:      | International Services   |
| Attention: | Operations, Reorg & Dividend Managers, Partners & Cashiers   |
| Subject:   | <b><u>Tax Relief</u></b> – Country: Japan<br>AEON CUSIP: 007627102<br><b><u>Record Date: 2/27/2019 Payable Date: TBA</u></b><br><b><u>CA Web Cut-Off: 3/15/2019 8:00 P.M. ET</u></b> |

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 the 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 on 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.*





**AEON** has announced a cash dividend and BNY Mellon acts as a 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.

As outlined in the Eligibility Matrix below, all qualifying holders will have the opportunity to receive their full treaty benefits on DR pay date. Holders not certified at the favorable or exempt withholding tax rates through CA Web will receive the dividend net of the full Japanese statutory withholding tax rate of 15.315% with the possibility to reclaim through the standard long form process.

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| DIVIDEND EVENT DETAILS  |  |
|---|--|
| <b>COUNTRY OF ISSUANCE</b>  | JAPAN  |
| <b>ISSUE</b>  | AEON   |
| <b>CUSIP#</b>   | 007627102  |
| <b>UNDERLYING ISIN</b>  | JP3388200002   |
| <b>DEPOSITARY</b>   | MULTIPLE   |
| <b>DR RECORD DATE</b>   | 2/27/2019  |
| <b>ORD PAY DATE</b>   | TBA  |
| <b>DR PAY DATE</b>  | TBA  |
| <b>RATIO (DR to ORD)</b>  | 1:1  |
| <b>ORD GROSS DIVIDEND RATE ON PAY DATE</b>  | TBA  |
| <b>STATUTORY WITHHOLDING RATE</b>   | 15.315% (5.0% additional local tax for Japanese individual residents only)   |
|  | DOUBLE CLICK ICON BELOW TO DOWNLOAD<br> |

**NOTE:** Appendix A, IRS Form W-9 and IRS Form W-8BEN must be retained by the DTC Participant for production upon request at any time or from time to time. Please note that the Japanese Tax Office has the legal authority to audit claims filed for a period of seven years so it is the DTC Participant’s responsibility to ensure that your document retention policies for US withholding tax documentation are adequate to support potential audits from the Japanese Tax Office.

## \*FEES & DEADLINES\*

| FILING METHOD    | BATCH                        | PAYMENT METHOD   | CUSTODIAL FEE    | TAX RELIEF FEE                             | MINIMUM FEE PER BENEFICIAL OWNER | FINAL SUBMISSION DEADLINE (ESP) |
|------------------|------------------------------|------------------|------------------|--|----------------------------------|---------------------------------|
| RELIEF AT SOURCE | PAYMENT ON PAY DATE          | VIA DTC          | NO FEE           | 5%, 10%, 12.5%, 15% - UP TO \$0.005 PER DR | \$0                              | March 15, 2019<br>8:00 P.M. EST |
|                  |                              |                  |                  | 0%- UP TO \$0.0075 PER DR                  |                                  |                                 |
| LONG FORM        | POST-CA WEB PROCESS; ONGOING | VIA CHECK OR ACH | UP TO JPY 40,000 | UP TO \$0.01 PER DR                        | \$25.00                          | 2/27/2024                       |

\*The Fees are that of The Bank of New York Mellon as First Filer. Deadlines are set by GlobeTax Services, Inc.

### Agreements, Fees, Representations and Indemnification from 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. Neither BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank 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 either BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank of up to \$0.0075 per Depositary Receipt for Relief at Source, or up to \$0.01 per Depositary Receipt for Long Form (with a minimum of \$25), and any other charges, fees or expenses payable by or due to either BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank or their 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 either BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, or JPMorgan Chase Bank '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 either BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, or JPMorgan Chase Bank may be shared with their 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 applicable tax regulators, and that BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank are 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 that 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, Citibank N.A., Deutsche Bank Trust Company Americas, or JPMorgan Chase Bank shall not be liable for the failure to secure any tax relief. We expressly agree that BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank and their 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, JPMorgan Chase Bank and their 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 – ELIGIBILITY MATRIX

| RATE DESCRIPTION            | RECLAIM RATE | ELIGIBLE RESIDENTS   |   | DOCUMENTATION REQUIRED   |
|-----------------------------|--------------|--|---|--|
| <b>EXEMPT - 0%</b>          | 20.42%       | PENSIONS<br>RESIDENT IN:   | AUSTRIA, CHILE, DENMARK, ICELAND, LATVIA, LITHUANIA,<br>NETHERLANDS, RUSSIA, SWITZERLAND, UNITED KINGDOM,<br>UNITED STATES, ZAMBIA<br><br>WORLD EXEMPTS   | <ol style="list-style-type: none"> <li><a href="#">APPENDIX A</a> (TO BE KEPT ON FILE)</li> <li>IRS W-9 / IRS W-8BEN (TO BE KEPT ON FILE)</li> </ol> |
| <b>FAVORABLE - 5%</b>       | 15.42%       | ALL ENTITIES<br>RESIDENT IN:   | SLOVENIA  | <ol style="list-style-type: none"> <li><a href="#">APPENDIX A</a> (TO BE KEPT ON FILE)</li> <li>IRS W-9 / IRS W-8BEN (TO BE KEPT ON FILE)</li> </ol> |
| <b>FAVORABLE - 10%</b>      | 10.42%       | ALL ENTITIES<br>RESIDENT IN:   | AUSTRALIA, AUSTRIA, BRUNEI, CHINA, ESTONIA, FRANCE,<br>HONG KONG, HUNGARY, INDIA, KUWAIT, LATVIA,<br>LITHUANIA, NETHERLANDS, OMAN, PAKISTAN, POLAND,<br>PORTUGAL, QATAR, ROMANIA, RUSSIA, SAUDI ARABIA,<br>SWEDEN, SWITZERLAND, TAIWAN, UNITED KINGDOM, UNITED<br>STATES, VIETNAM   | <ol style="list-style-type: none"> <li><a href="#">APPENDIX A</a> (TO BE KEPT ON FILE)</li> <li>IRS W-9 / IRS W-8BEN (TO BE KEPT ON FILE)</li> </ol> |
|                             |              | SELECT<br>ENTITIES<br>RESIDENT IN:   | UNITED ARAB EMIRATES**  |  |
| <b>FAVORABLE - 12.5%</b>    | 7.92%        | ALL ENTITIES<br>RESIDENT IN:   | BRAZIL  | <ol style="list-style-type: none"> <li><a href="#">APPENDIX A</a> (TO BE KEPT ON FILE)</li> <li>IRS W-8BEN (TO BE KEPT ON FILE)</li> </ol>           |
| <b>FAVORABLE - 15%</b>      | 5.42%        | ALL ENTITIES<br>RESIDENT IN:   | ARMENIA, AZERBAIJAN, BANGLADESH, BELARUS, BELGIUM,<br>BULGARIA, CANADA, CHILE, CZECH REPUBLIC, DENMARK,<br>EGYPT, FINLAND, GEORGIA, GERMANY, ICELAND, INDONESIA,<br>IRELAND, ISRAEL, ITALY, KAZAKHSTAN, KOREA, REPUBLIC OF,<br>KYRGYZSTAN, LUXEMBOURG, MALAYSIA, MEXICO, MOLDOVA,<br>NEW ZEALAND, NORWAY, PHILIPPINES, SINGAPORE, SLOVAK<br>REPUBLIC, SOUTH AFRICA, SPAIN, TAJIKISTAN, TURKEY,<br>TURKMENISTAN, UKRAINE, UZBEKISTAN | <ol style="list-style-type: none"> <li><a href="#">APPENDIX A</a> (TO BE KEPT ON FILE)</li> <li>IRS W-8BEN (TO BE KEPT ON FILE)</li> </ol>           |
| <b>15.315%</b>              | 5.105%       | ALL BENEFICIARIES <b>EXCEPT</b> JAPANESE INDIVIDUAL RESIDENTS,<br>LARGE SHAREHOLDERS, TREATY ELIGIBLE PENSIONS &<br>TREATY ELIGIBLE HOLDERS.                     |   | NO DOCUMENTATION OR ESP SUBMISSION<br>REQUIRED   |
| <b>20.315%</b>              | 0.105%       | JAPANESE INDIVIDUAL RESIDENTS  |   | <ol style="list-style-type: none"> <li><a href="#">APPENDIX A</a> (TO BE KEPT ON FILE)</li> </ol>  |
| <b>UNFAVORABLE - 20.42%</b> | 0%           | LARGE SHAREHOLDERS THAT HOLD 3% OR MORE OF THE OUTSTANDING<br>SHARES EXCLUDING FOREIGN/(JAPANESE) & DOMESTIC CORPORATE LARGE<br>SHAREHOLDERS FOR DIVIDEND INCOME |   | <ol style="list-style-type: none"> <li><a href="#">APPENDIX A</a> (TO BE KEPT ON FILE)</li> </ol>  |

\*Note: All documents listed in [BLUE font](#) are generated by GlobeTax's ESP website after submission of beneficial owner data

\*\*Refer to FAQs (Page 9) for list of select entities.

## RELIEF AT SOURCE - INVESTOR TYPES

| INVESTOR           | RESIDENCY   | TYPE   | CONDITIONS   | AUDIT DOCUMENTATION                                  |
|--------------------|---|--|--|--|
| INDIVIDUAL         | U.S.  | Certified person   | A complete and valid U.S. address*   | Form W-9   |
|                    | NON-U.S.  | Certified person   | Resides in a jurisdiction that has a treaty with Japan and does not have a permanent address in Japan  | Form W-8BEN  |
| CORPORATION        | U.S.  | S-Corp/C-Corp  | A complete and valid U.S. address*   | Form W-9   |
|                    |   | LLC  | Disregarded entity, disregarded into a US Individual or other body of persons that are entitled to claim treaty benefits and elected to be treated as an S- or C-Corp that has a complete and valid US address   |  |
|                    | NON-U.S.  | Certified Corp   | Resides in a jurisdiction that has a treaty with Japan and does not have a permanent address in Japan  | Form W-8BEN  |
| TRUST              | U.S.  | Complex  | Comprised of U.S. Individuals or other body of persons that are entitled to claim treaty benefits  | Form W-9   |
|                    |   | Grantor  | Grantor is a U.S. Individual or other body of persons that are entitled to claim treaty benefits   |  |
|                    |   | Simple   | Beneficiaries are U.S. or other body of persons that are entitled to claim treaty benefits   |  |
| RIC, REIT & REMIC  | U.S.  | N/A  | A complete and valid U.S. address*   | Form W-9, prospectus or any legal ancillary document |
| NON-PROFIT         | U.S.  | Charity, Foundation  | Tax exempt organizations that meet 501(c) requirements   | Form W-9 or any legal ancillary document             |
| GOVERNMENT         | U.S.  | Government, state and any political subdivision or local authority | A complete and valid U.S. address*   | Form W-9   |
| PENSION            | Please see Treaty Eligible Pensions Exhibit on Page 5 |  |  |  |
| TRANSPARENT ENTITY | U.S.  | Partnership and similar vehicles                                   | If underlying members of fiscally transparent entity are U.S. residents, then all of the interest income would be eligible for the benefits of the convention. Alternatively, the portion attributable to eligible U.S. residents would be eligible to claim treaty benefits | Form W -9  |

**\*NOTE:** The definition of a “Valid U.S. Address” is a U.S. address:

- that is not a PO Box
- that is not in a U.S. Territory of Protectorate State
- is supported by the Share of an IRS Form W9 prior to January 1 of the year in which the dividend payment occurred
- the IRS Form W9 has not been revoked by the resident due to change in tax residence
- the DTC Participant has no indication of a secondary residence and/or address in Japan

## TREATY ELIGIBLE PENSIONS

| COUNTRY OF PENSION FUND | DESCRIPTION  | QUALIFYING PLANS   |
|-------------------------|--|--|
| <b>UNITED STATES</b>    | <p><b>APPLIES TO A BENEFICIAL OWNER OF THE DRs THAT:</b></p> <ol style="list-style-type: none"> <li>1) IS NOT ENGAGED IN A TRADE OR BUSINESS IN JAPAN THROUGH A PERMANENT ESTABLISHMENT SITUATED IN JAPAN, WITHIN THE MEANING OF THE U.S. DOUBLE TAXATION TREATY WITH JAPAN</li> <li>2) IS A QUALIFYING "PENSION FUND" AS DEFINED ON PAGE 11 OF THE TECHNICAL EXPLANATION OF THE NEW TAX TREATY BETWEEN THE U.S. AND JAPAN, PUBLISHED BY THE U.S. DEPARTMENT OF TREASURY</li> <li>3) IS ABLE TO CERTIFY THAT MORE THAN 50 % OF THE BENEFICIARIES, MEMBERS OR PARTICIPANTS OF THE ELIGIBLE PENSION FUND WERE INDIVIDUAL RESIDENTS OF THE U.S. OR JAPAN AS OF THE PRIOR TAXABLE PERIOD</li> </ol>  | <ul style="list-style-type: none"> <li>✓ QUALIFIED PLANS UNDER SECTION 401(A)</li> <li>✓ INDIVIDUAL RETIREMENT PLANS (INCLUDING THOSE THAT ARE A PART OF A SIMPLIFIED EMPLOYEE PENSION PLAN THAT SATISFIES 408(K))</li> <li>✓ INDIVIDUAL RETIREMENT ACCOUNTS, INDIVIDUAL RETIREMENT ANNUITIES, SECTION 408(P) ACCOUNTS</li> <li>✓ ROTH IRAS UNDER SECTION 408 A</li> <li>✓ SECTION 457 GOVERNMENTAL PLANS</li> <li>✓ SECTION 403(A) QUALIFIED ANNUITY PLANS</li> <li>✓ SECTION 403(B) PLANS</li> <li>✓ SECTION 401(K) PLANS QUALIFY AS PENSION FUNDS BECAUSE A 401(K) PLAN IS A TYPE OF 401(A) PLAN.</li> <li>✓ - ANY OTHER FUND IDENTICAL OR SUBSTANTIALLY SIMILAR TO THE FOREGOING SCHEMES THAT ARE ESTABLISHED PURSUANT TO LEGISLATION INTRODUCED AFTER THE DATE OF SIGNATURE OF THE CONVENTION.</li> </ul> |
| <b>UNITED KINGDOM</b>   | <p><b>APPLIES TO A BENEFICIAL OWNER OF THE DRs THAT:</b></p> <ol style="list-style-type: none"> <li>1) IS NOT ENGAGED IN A TRADE OR BUSINESS IN JAPAN THROUGH A PERMANENT ESTABLISHMENT SITUATED IN JAPAN, WITHIN THE MEANING OF THE U.K. DOUBLE TAXATION TREATY WITH JAPAN,</li> <li>2) IS A QUALIFYING "PENSION FUND" AS DEFINED BY ARTICLE 22, PARAGRAPH 2(E) OF THE INCOME TAX CONVENTION BETWEEN JAPAN AND THE UNITED KINGDOM OF GREAT BRITAIN AND NORTHERN IRELAND, PUBLISHED BY THE MINISTRY OF FINANCE JAPAN</li> <li>3) IS ABLE TO CERTIFY THAT MORE THAN 50 % OF THE BENEFICIARIES, MEMBERS OR PARTICIPANTS OF THE ELIGIBLE PENSION FUND WERE INDIVIDUAL RESIDENTS OF THE U.K. OR JAPAN AS OF THE PRIOR TAXABLE PERIOD.</li> </ol> |  |
| <b>SWITZERLAND</b>      | <p><b>APPLIES TO A BENEFICIAL OWNER OF THE DRs THAT:</b></p> <ol style="list-style-type: none"> <li>1) IS NOT ENGAGED IN A TRADE OR BUSINESS IN JAPAN THROUGH A PERMANENT ESTABLISHMENT SITUATED IN JAPAN, WITHIN THE MEANING OF SWITZERLAND DOUBLE TAXATION TREATY WITH JAPAN,</li> <li>2) IS A QUALIFYING "PENSION FUND" AS DEFINED BY ARTICLE 22A, PARAGRAPH 2(E) OF THE INCOME TAX CONVENTION BETWEEN JAPAN AND SWITZERLAND, PUBLISHED BY THE MINISTRY OF FINANCE JAPAN</li> <li>3) IS ABLE TO CERTIFY THAT MORE THAN 50 % OF THE BENEFICIARIES, MEMBERS OR PARTICIPANTS OF THE ELIGIBLE PENSION FUND WERE INDIVIDUAL RESIDENTS OF SWITZERLAND OR JAPAN AS OF THE PRIOR TAXABLE PERIOD.</li> </ol>                                       |  |

## TREATY ELIGIBLE PENSIONS (continued)

| COUNTRY OF PENSION FUND | DESCRIPTION  | QUALIFYING PLANS  |
|-------------------------|--|---|
| <b>NETHERLANDS</b>      | <p><b>APPLIES TO A BENEFICIAL OWNER OF THE DRs THAT:</b></p> <ol style="list-style-type: none"> <li>1) IS NOT ENGAGED IN A TRADE OR BUSINESS IN JAPAN THROUGH A PERMANENT ESTABLISHMENT SITUATED IN JAPAN, WITHIN THE MEANING OF THE NETHERLANDS DOUBLE TAXATION TREATY WITH JAPAN,</li> <li>2) IS A QUALIFYING "PENSION FUND" AS DEFINED BY ARTICLE 21, PARAGRAPH 2(D) OF THE INCOME TAX CONVENTION BETWEEN JAPAN AND THE NETHERLANDS PUBLISHED BY THE MINISTRY OF FINANCE JAPAN</li> <li>3) IS ABLE TO CERTIFY THAT MORE THAT 50 % OF THE BENEFICIARIES, MEMBERS OR PARTICIPANTS OF THE ELIGIBLE PENSION FUND WERE INDIVIDUAL RESIDENTS OF THE NETHERLANDS OR JAPAN AS OF THE PRIOR TAXABLE PERIOD.</li> </ol> |   |
| <b>LATVIA</b>           | <p><b>APPLIES TO A BENEFICIAL OWNER OF THE DRs THAT:</b></p> <ol style="list-style-type: none"> <li>1) IS NOT ENGAGED IN A TRADE OR BUSINESS IN JAPAN THROUGH A PERMANENT ESTABLISHMENT SITUATED IN JAPAN, WITHIN THE MEANING OF THE LATVIAN DOUBLE TAXATION TREATY WITH JAPAN.</li> <li>2) IS A QUALIFYING "PENSION FUND" AS DEFINED IN SUBPARAGRAPH (L) OF PARAGRAPH 1 OF ARTICLE 3 OF THE TAX TREATY BETWEEN LATVIA AND JAPAN.</li> <li>3) IS ABLE TO CERTIFY THAT MORE THAN 50 % OF THE BENEFICIARIES, MEMBERS OR PARTICIPANTS OF THE ELIGIBLE PENSION FUND WERE INDIVIDUAL RESIDENTS OF LATVIA OR JAPAN AS OF THE PRIOR TAXABLE PERIOD</li> </ol>   | <ul style="list-style-type: none"> <li>✓ IS ESTABLISHED UNDER THE LAWS OF A CONTRACTING STATE;</li> <li>✓ IS OPERATED PRINCIPALLY TO ADMINISTER OR PROVIDE PENSIONS, RETIREMENT BENEFITS OR OTHER SIMILAR REMUNERATION OR TO EARN INCOME FOR THE BENEFIT OF OTHER PENSION FUNDS; AND</li> <li>✓ IS EXEMPT FROM TAX IN THAT CONTRACTING STATE WITH RESPECT TO INCOME DERIVED FROM THE ACTIVITIES DESCRIBED IN CLAUSE (II).</li> </ul>  |
| <b>CHILE</b>            | <p><b>APPLIES TO A BENEFICIAL OWNER OF THE DRs THAT:</b></p> <ol style="list-style-type: none"> <li>1. IS NOT ENGAGED IN A TRADE OR BUSINESS IN JAPAN THROUGH A PERMANENT ESTABLISHMENT SITUATED IN JAPAN, WITHIN THE MEANING OF THE CHILAEN DOUBLE TAXATION TREATY WITH JAPAN.</li> <li>2. IS A QUALIFYING "PENSION FUND" AS DEFINED IN SUBPARAGRAPH (J) OF PARAGRAPH 1 OF ARTICLE 3 OF THE TAX TREATY BETWEEN CHILE AND JAPAN.</li> </ol>  | <ul style="list-style-type: none"> <li>✓ WAS CONSTITUTED AND IS OPERATED IN A CONTRACTING STATE EXCLUSIVELY OR ALMOST EXCLUSIVELY TO ADMINISTER OR PROVIDE PENSION OR OTHER SIMILAR REMUNERATION UNDER THE SOCIAL SECURITY LEGISLATION OF THAT CONTRACTING STATE RECOGNISED AS SUCH FOR TAX PURPOSES IN THAT CONTRACTING STATE, PRIMARILY FOR THE BENEFIT OF RESIDENTS OF THAT CONTRACTING STATE; OR</li> <li>✓ WAS CONSTITUTED AND IS OPERATED TO INVEST FUNDS FOR THE BENEFIT OF PERSONS REFERRED TO IN CLAUSE (I), PROVIDED THAT SUBSTANTIALLY ALL THE INCOME OF THAT PERSON IS DERIVED FROM INVESTMENTS MADE FOR THE BENEFIT OF THESE PERSONS.</li> </ul> |

## ELIGIBILITY MATRIX – LONG FORM

| RATE DESCRIPTION                   | ENTITY TYPE   | ELIGIBLE RESIDENTS   | DOCUMENTATION REQUIRED   |
|------------------------------------|---|--|--|
| <b>PRE-2014<br/>PAYING ISSUES</b>  | PENSIONS  | NETHERLANDS, SWITZERLAND,<br>UNITED STATES, UNITED KINGDOM   | <ol style="list-style-type: none"> <li>1. <a href="#">Appendix A (Cover Letter)</a></li> <li>2. <a href="#">Summary of Claim</a></li> <li>3. <a href="#">Pension Declaration Letter</a> (Pensions Exempt Only)</li> <li>4. <a href="#">Proof of Payment</a></li> <li>5. 6166/ COR</li> <li>6. Power of Attorney (POA)</li> <li>7. Limited POA</li> <li>8. Discrepancy Letter</li> <li>9. Form 17 (U.K., Swiss, and Dutch residents)</li> </ol>                                 |
|                                    | RETIREMENT ACCOUNTS   |  |  |
|                                    | IRAs  |  |  |
|                                    | GROUP TRUSTS<br><br>Note: Group Trusts may file at the trust level if all underlying holders are of the same country of residence as the trust itself | NETHERLANDS, SWITZERLAND,<br>UNITED STATES, UNITED KINGDOM   | <ol style="list-style-type: none"> <li>1. <a href="#">Appendix A (Cover Letter)</a></li> <li>2. <a href="#">Summary of Claim</a></li> <li>3. <a href="#">Pension Declaration Letter</a> (Pensions Exempt Only)</li> <li>4. <a href="#">Proof of Payment</a></li> <li>5. 6166/ COR</li> <li>6. Power of Attorney (POA)</li> <li>7. Limited POA</li> <li>8. Discrepancy Letter</li> <li>9. Tax Determination Letter</li> <li>10. List of Underlying Trusts (If known)</li> </ol> |
| <b>POST-2014<br/>PAYING ISSUES</b> | NON-PENSIONS  | ALL ELIGIBLE COUNTRIES ENTITLED<br>TO FAVORABLE RATE. PLEASE SEE<br>RELIEF AT-SOURCE MATRIX                | <ol style="list-style-type: none"> <li>1. <a href="#">Appendix A (Cover Letter)</a></li> <li>2. <a href="#">Summary of Claim</a></li> <li>3. <a href="#">Pension Declaration Letter</a> ( Pensions Exempt Only)</li> <li>4. <a href="#">Proof of Payment</a></li> <li>5. 6166/ COR</li> <li>6. Power of Attorney (POA)</li> <li>7. Limited POA</li> <li>8. Discrepancy Letter</li> <li>9. Form 17</li> </ol>   |
|                                    | PENSIONS  | AUSTRIA, CHILE, DENMARK, ICELAND,<br>NETHERLANDS, RUSSIA,<br>SWITZERLAND, UNITED KINGDOM,<br>UNITED STATES |  |

\*Note: All documents listed in [BLUE font](#) are generated by GlobeTax's ESP website after submission of beneficial owner data.



| DESCRIPTION OF VARIOUS DOCUMENTATION |   |
|--------------------------------------|---|
| DOCUMENT NAME                        | DESCRIPTION   |
| APPENDIX A<br>(COVER LETTER)         | Indemnification and Listing of Beneficial Owners and/or Japanese Individual residents generated by ESP.   |
| IRS FORM W-9                         | <a href="https://www.irs.gov/uac/about-form-w9">https://www.irs.gov/uac/about-form-w9</a>   |
| IRS FORM W-8BEN                      | <a href="https://www.irs.gov/uac/form-w-8ben-certificate-of-foreign-status-of-beneficial-owner-for-united-states-tax-withholding">https://www.irs.gov/uac/form-w-8ben-certificate-of-foreign-status-of-beneficial-owner-for-united-states-tax-withholding</a> |
| IRS FORM 6166                        | <a href="https://www.irs.gov/individuals/international-taxpayers/form-6166-certification-of-u-s-tax-residency">https://www.irs.gov/individuals/international-taxpayers/form-6166-certification-of-u-s-tax-residency</a>                                       |
| JAPAN FORM 17                        | Attachment Form for Limitation of Benefits article. *Additional documents (e.g. Prospectus, PR brochure, explanation letter) may be required to support Form 17 Certifications.   |
| JAPAN FORM 16                        | List of underlying members or partners of transparent entity  |
| APPENDIX B<br>(POWER OF ATTORNEY)    | Signed by Beneficial Owner appointing Depository on Beneficial Owner's letterhead   |
| LIMITED POWER OF ATTORNEY            | If the POA is signed by the Broker, trust agreement or notarized limited POA must also be submitted   |
| PROOF OF PAYMENT                     | Document certifying payment has been credited to the Pensions fund's account.   |

| CONTACT DETAILS       |  |
|-----------------------|--|
| PRIMARY CONTACT       | IVANNA FEDORCHAK   |
| 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   |
| GROUP EMAIL           | <a href="mailto:JAPANESP@GLOBETAX.COM">JAPANESP@GLOBETAX.COM</a> |
| COMPANY               | GLOBETAX SERVICES INC.   |
| STREET ADDRESS        | ONE NEW YORK PLAZA, 34 <sup>TH</sup> FLOOR                       |
| CITY/STATE/ZIP        | NEW YORK, NY 10004   |
| SECONDARY CONTACT     | BRAE CREECH  |



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.**

**ESP is equipped with a bulk upload feature that allows for multiple relief at-source events to be submitted within a single upload. Please submit the data online through the website below, print the required documents on letterhead, sign, and mail to BNY Mellon / GlobeTax.**

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

<https://ESP.GlobeTax.com>

**Please contact [support@globetax.com](mailto:support@globetax.com) at 212-747-9100 if you have any questions about this process.**

## FREQUENTLY ASKED QUESTIONS (FAQs)

### AT SOURCE QUESTIONS

|  |   |
|--|---|
| <b>What information does the beneficiary need to disclose in order to receive favorable tax treatment?</b>             | Name, address, country of residence, and share position. A tax ID number is only required for U.S. residents.   |
| <b>Do shareholders requesting 15.315% withholding need to disclose information?</b>                                    | No, disclosure does not apply. Please refer to relief at-source eligibility matrix for documentation requirements   |
| <b>Will holders wishing to benefit from favorable tax treatment need to furnish supporting documentation up front?</b> | No, brokers must store W-9 and W-8BEN on file in case of an audit.  |
| <b>Does the Japanese law require a certification of residence (Form 6166) to participate in the reclaim process?</b>   | No. The law governing the processing of DRS does not require the presence or collection of a certification of residency (Form 6166) though participants may be required to prove the eligibility of the underlying investors. Upon review of the W-9 and W-8BEN forms the Japanese tax office agreed to accept these as proof of eligibility.   |
| <b>Will a certificate of residence (Form 6166) be requested during an audit?</b>                                       | The Japanese ministry of finance reserves the right to request any other documentation it may need to determine the eligibility of the investor. We have been advised that the Japanese tax office may request a certificate of residency in rare circumstances where the information provided is inconsistent and cannot be confirmed through the provision of other documents or explanations.  |
| <b>Who is considered a “large shareholder”?</b>  | Individual (non-corporate) investors who hold 3% or more of the number of outstanding shares for dividend income from listed shares, now fall under the "large shareholder" category. These "large shareholders" will no longer be eligible for the preferential tax rates and thus be applied the 20.42% tax rate for dividends paid after September 30, 2011. Participants are required to disclose the name and address of these "large shareholders" to the depositary by the deadline stated within this notice. Corporate entities (both Japanese and non-Japanese) who hold 3% or more of the number of outstanding shares for dividend income from listed shares are still entitled to the preferential withholding rates and are eligible to receive the income with a 15.315% withholding rate applied or more if eligible based on the treaty between the investors country of residence and Japan. Dividend income for unlisted shares will continue to be withheld at the 20.42% Japanese national tax rate. |
| <b>Which select United Arab Emirates resident entities are eligible to receive a favorable rate?</b>                   | <ul style="list-style-type: none"> <li>▪ Central Bank of the UAE</li> <li>▪ Abu Dhabi Investment Authority</li> <li>▪ Abu Dhabi Investment Council</li> <li>▪ International Petroleum Investment Company</li> <li>▪ Investment Corporation of Dubai</li> <li>▪ Mubadala Development Company</li> <li>▪ Eligible pension funds established in the UAE</li> </ul>   |

### LONG FORM QUESTIONS

|  |  |
|--|--|
| <b>Can I submit a trust agreement in lieu of a POA signed by the beneficial owner?</b> | Yes, but a limited POA signed by the participant must be accompanied by the trust agreement. |
| <b>Are Form 6166s with IRS code ruling 81-100 accepted?</b>                            | Yes, with a tax determination letter & pension declaration letter.                           |
| <b>Does the beneficiaries name on the Form 6166 need to match the POA?</b>             | Yes, the beneficiaries name on both documents should be identical.                           |
| <b>How long does it take for long form claims to be paid?</b>                          | We estimate it takes up to one year for long form claims to be paid                          |

|   |   |
|---|---|
| <b>Does the long form process have a minimum position requirement per beneficial owner?</b>           | Yes, please call for more details.  |
| <b>What is the statute of limitations for filing Japanese reclaims?</b>                               | It is 5 years from ordinary pay date. Claims received after our submission deadline will be filed on a best effort basis.   |
| <b>What if the beneficial owner name and/or address is not consistent with the other documents?</b>   | Please send a letter on participant letterhead explaining the discrepancy and be sure to include the tax ID number.   |
| <b>How often are long form claims filed with the Japanese custodians?</b>                             | Due to quarterly filing limitations GlobeTax files on February 20th, May 20th, August 20th & November 20th of each year.  |
| <b>Will BNY Mellon accept claims filed directly to them by beneficial owners?</b>                     | BNY Mellon only accepts claims filed by the DTC participant who was holding 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.   |
| <b>Do pension plans need to disclose any underlying holder information for the long form process?</b> | Yes, effective September 1, 2012 pension plans will need to disclose the total number of participants, the number of treaty eligible participants and the date of fiscal year end.  |
| <b>Is this long form process free of charge?</b>  | No. This tax reclaim assistance service is wholly voluntary and discretionary and outside the terms and conditions of any applicable deposit agreement. Neither BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank 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 \$0.01 per depository receipt for standard long form reclaims with a minimum of \$25.00. 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 either BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank 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 either BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank may be shared with its agents. |

***Warning and Disclaimer:***

BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank 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, Citibank N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank 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, Citibank N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank 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, Citibank N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank 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.