

В#:	2480-14		
Date:	December 31, 2014		
То:	All Participants		
Category:	Dividends		
From:	International Services		
Attention:	Operations, Reorg & Dividend Managers, Partners & Cashiers		
	<u>Tax Relief</u> – <u>Country</u> : Korea		
Subject:	LG ELECTRONICS INC   CUSIP: 50186Q103		
Subject:	Record Date: 12/31/2014 Payable Date: TBA		
	EDS Cut-Off: 01/23/2015 8:00 P.M. (EST)		

Participants can use DTC's Elective Dividend System (EDS) function over the Participant Terminal System (PTS) or TaxRelief option on the Participant Browser System (PBS) website 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.



#### **LG ELECTRONICS INC - COMMON**

has announced a cash dividend. Citibank, N.A. acts as the sole Depositary for the company's American Depositary Receipt ("ADR") program.

Participants can use DTCC's Elective Dividend System (EDS) function over the Participant Terminal System (PTS) or TaxRelief option on the Participant Browser System (PBS) web site to certify all or a portion of their position entitled to the applicable withholding tax rate. Use of EDS will permit entitlement amounts to be paid through DTCC.

On ADR pay date, all eligible holders will have the opportunity to receive accurate entitlement as outlined in the "Eligibility Matrix". All holders not eligible for EDS or not certified at a reduced withholding tax rate through EDS will receive the dividend net of the full Korean statutory withholding tax rate of 22% with the possibility to reclaim through the standard long form process.

DIVIDEND E	DIVIDEND EVENT DETAILS						
COUNTRY OF ISSUANCE	KOREA, REPUBLIC OF						
ISSUE	LG ELECTRONICS INC - COMMON						
CUSIP#	50186Q103						
DEPOSITARY	CITIBANK, N.A.						
ADR RECORD DATE	12/31/2014						
ADR PAY DATE	ТВА						
ADR GROSS DIVIDEND RATE ON PAY DATE	ТВА						
ORD GROSS DIVIDEND RATE ON PAY DATE	ТВА						
RATIO	1 ORD : 2 ADRs						
WHT RATE	22%						

	FEES & DEADLINES								
FILING METHOD	ВАТСН	BATCH PAYMENT METHOD		MINIMUM SERVICE CHARGE PER BENEFICIAL OWNER	FINAL SUBMISSION DEADLINE (EDS & DOCUMENTATION)				
RELIEF AT SOURCE	PAYMENT ON PAY DATE	EDS	UP TO \$0.005 per ADR	USD \$0.00	1/23/2015; 8:00 P.M. EST				
STANDARD LONG FORM	POST PAY DATE ; ONGOING	CHECK	UP TO \$0.0075 per ADR	MINIMUM USD \$25.00 TAX RELIEF FEE AND UP TO KRW 50,000 CUSTODIAL FEE	UP TO 3 YEARS FROM ADR RECORD DATE				

	ELIGIBILITY MATRI	X		
RATE DESCRIPTION	ELIGIBLE RESIDENTS	DOCUMENTATION REQUIRED		
UNFAVORABLE – 22%	PHILIPPINES, MALAYSIA (LABUAN), NON-TREATY COUNTRIES, UNCERTIFIED HOLDERS	NONE		
FAVORABLE – 20%, 16.5%, 15%, 12.5%, 11%, 10%, 7%, 5%	SEE ATTACHED LIST	1) WITHHOLDING CERTIFICATION		
FAVORABLE – 16.5%	UNITED STATES, SOUTH AFRICA	1) WITHHOLDING CERTIFICATION		
FAVORABLE – 15.4%	KOREA, REPUBLIC OF (INDIVIDUALS)	1) WITHHOLDING CERTIFICATION 2) COPY OF PASSPORT OR COPY OF RESIDENT REGISTRATION ID#		
EXEMPT – 0%	KOREA, REPUBLIC OF (INSTITUTIONS)	1) WITHHOLDING CERTIFICATION 2) COPY OF COMPANY/BUSINESS REGISTRATION ID#		

	ADDITIONAL DOCUMENTA	ΑT	ION REQUIR	EMENTS	
INVESTOR TYPE	ELIGIBILITY CRITERIA / DEFINITION	C	ADDITIONAL DOCUMENTATION REQUIRED	VALIDITY OF DOCUMENTATION	COMPLETED BY
OVERSEAS INVESTMENT VEHICLE (OIV)	A VEHICLE ESTABLISHED OVERSEAS BY RAISING FUNDS THROUGH INVESTMENT OFFERING THAT MANAGES INVESTMENT ASSETS WITH PROPERTY VALUE BY ACQUIRING, DISPOSING OF OR OTHER METHOD, AND ATTRIBUTES THE RESULTS OF SUCH INVESTMENT TO INVESTOR(S) BY DISTRIBUTION	2)	VEHICLE (FORM 29-13; SECTION 2) SCHEDULE OF BENEFICIAL OWNERS (ANNEX	ORIGINALS WILL REMAIN VALID FOR UP TO THREE YEARS PROVIDED THE UNDERLYING HOLDERS OF THE OIV DO NOT CHANGE DURING THAT TIME.	OIV
PUBLIC COLLECTIVE INVESTMENT	AN OIV THAT ALSO SATISFIES ALL REQUIREMENTS BELOW:  i) OPCIV SHOULD BE AN CIV SIMILAR TO A COLLECTIVE INVESTMENT VEHICLE UNDER THE FINANCIAL INVESTMENT SERVICES AND CAPITAL MARKET ACT AND REGISTERED OR APPROVED UNDER THE RELEVANT LAWS OF A TAX TREATY PARTNER COUNTRY;  ii) THE SECURITIES OF OPCIV SHOULD NOT BE ISSUED BY WAY OF PRIVATE PLACEMENT AND THE OPCIV SHOULD HAVE 100 OR MORE INVESTORS (AN OVERSEAS INVESTMENT VEHICLE SHALL BE COUNTED AS ONE INVESTOR IN THIS REGARD) AT THE END OF PRECEDING FISCAL YEAR (OR, AS AT THE DATE OF SUBMISSION OF OIV REPORT IF THE OIV IS NEWLY ESTABLISHED); AND  iii) OPCIV SHOULD NOT BE AN OIV SUBJECT TO ANY TAX TREATY PROVISIONS THAT DENY TAX TREATY BENEFITS.	1)	OVERSEAS INVESTMENT VEHICLE (FORM 29-13; SECTION 1)	ORIGINALS WILL REMAIN VALID FOR UP TO THREE YEARS PROVIDED THE UNDERLYING HOLDERS OF THE OPCIV DO NOT CHANGE DURING THAT TIME.	OPCIV

PENSIONS & NON-PROFIT ORGANIZATIONS	DEEMED BENEFICIAL OWNERS ("BO"):  i) A PENSION FUND ESTABLISHED UNDER THE LAWS OF A TAX TREATY PARTNER COUNTRY, WHICH ARE EQUIVALENT TO THE KOREAN NATIONAL PENSION ACT, PUBLIC OFFICIALS PENSION ACT, PENSIONS FOR PRIVATE SCHOOL TEACHERS AND STAFF ACT AND GUARANTEE OF WORKERS' RETIREMENT BENEFIT ACT, ETC.; ii) A FUND THAT IS ESTABLISHED AS A NON- PROFIT ORGANIZATION UNDER THE LAWS OF A TAX TREATY PARTNER COUNTRY, WHICH DOES NOT DISTRIBUTE ITS PROFITS TO ITS MEMBERS; OR iii) AN OIV RECOGNIZED AS BO UNDER THE TAX TREATY.	1) DOCUMENTS SUBSTANTIATING THE FACT THE APPLICANT FALLS UNDER ANY OF THE CATEGORIES i) THROUGH iii) (e.g. COR, FORM 6166 or FORM 72- 2)	ORIGINALS WILL REMAIN VALID FOR UP TO THREE YEARS.	PENSION FUND / NON-PROFIT ORGANIZATION
ENTITY TYPES NOT LISTED IN THIS MATRIX	N/A	NONE	N/A	N/A

CONTACT DETAILS					
PRIMARY CONTACT	EILEEN CHAN				
DOMESTIC PHONE (U.S.)	1-800-628-4646				
DOMESTIC FAX (U.S.)	1-800-633-4646				
INTERNATIONAL PHONE	1-212-747-9100				
INTERNATIONAL FAX	1-212-747-0029				
EMAIL ADDRESS	EILEEN_CHAN@GLOBETAX.COM				
COMPANY	CITIBANK, N.A. / GLOBETAX				
STREET ADDRESS	90 BROAD STREET, 16 <sup>TH</sup> FLOOR				
CITY/STATE/ZIP	NEW YORK, NY 10004				
ADDITIONAL CONTACTS	JONATHAN STAAKE				

#### **ESP**



Citibank, N.A 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 Citibank, N.A. and creates applicable documentation on the Participant's behalf. Submit the data online through the web site below, print out the document on letterhead, sign, and mail to Citibank, N.A. / GlobeTax along with the necessary documentation.

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

https://ESP.GlobeTax.com

Please contact Eileen Chan at 1-212-747-9100 if you have any questions about this process.

FREQUENTLY ASKED QUESTIONS (FAQs)					
QUESTION	ANSWER				
DO LUXEMBOURG RESIDENTS NEED TO SUBMIT TWO ORIGINAL CERTIFICIATES OF RESIDENCE IN ORDER TO BENEFIT FROM TREATY RELIEF?	EFFECTIVE SEPTEMBER 4, 2013 LUXEMBOURG RESIDENTS ARE NO LONGER REQUIRED TO PROVIDE ORIGINAL CORS IN ORDER TO OBTAIN FAVORABLE TREATY BENEFITS. LUXEMBOURG OIVs/OPCIVs/PENSIONS/NON-PROFITS SEEKING TREATY BENEFITS ARE TO FURNISH THE ADDITIONAL DOCUMENTATION DETAILED IN THIS NOTICE.				
HOW ARE WORLD EXEMPT ENTITIES TREATED?	COPY OF SUPPORTING DOCUMENTATION MUST ACCOMPANY CLAIM IN ORDER TO RECEIVE THE EXEMPT RATE OF 0%.				
WHAT IF A HOLDER RESIDES IN A JURISDICTION WHERE TINS ARE NOT ISSUED (e.g. JAPAN)?	VALID PERSONAL IDs, WHICH INCLUDE DATE OF BIRTH (INDIVIDUALS) OR DATE OF ESTABLISHMENT (NON-INDIVIDUALS) IN MMDDYYYY FORMAT, MUST BE GIVEN.				
ARE THERE ADDITIONAL FEES INVOLVED FOR THE STANDARD LONG FORM PROCESS?	EFFECTIVE JANUARY 1, 2011, POST PAY-DATE PROCESSING WILL BE SUBJECT TO CUSTODIAL PROCESSING FEE OF KRW 50,000 PER BENEFICIAL OWNER.				
WHAT IF THE PARTICIPANT IS UNABLE TO SUBMIT DOCUMENTATION BY THE SUBMISSION DEADLINE?	IT IS STRONGLY ADVISED THAT PARTICIPANTS UTILIZE THE RELIEF AT SOURCE PROCESS AND SUBMIT VALID DOCUMENTATION BY THE ABOVE DEADLINE. CLAIMS RECEIVED AFTER OUR SUBMISSION DEADLINE WILL BE FILED ON A BEST EFFORT BASIS. PLEASE CONTACT US BEFORE SUBMITTING A POST PAY-DATE CLAIM.				
DO WE NEED TO DISCLOSE THE UNDERLYING HOLDERS OF OIVs/OPCIVs?	OIVS NEED TO FILE AT THE PARTNER / UNDERLYING HOLDER LEVEL BY PRORATING THE SHARES HELD BY THE OIV (BASED ON PERCENTAGE OF OWNERSHIP) AND CLAIMING EACH UNDERLYING HOLDER FOR THE NUMBER OF SHARES HELD (FUND NAME SHOULD PRECEED UNDERLYING HOLDER NAME).  OPCIVS NEED TO FILE AT THE FUND LEVEL IN AGGREGATE BY COUNTRY OF RESIDENCE OF THE UNDERLYING HOLDERS. PLEASE REFER TO DTCC B# NOTICES 0971-13, 0592-13, 1950-12, 0553-12 & 1670-12 FOR ADDITIONAL INFORMATION.				
WHAT TYPES OF ENTITIES ARE CONSIDERED OIVS UNDER THE INTENTIONS OF THE NEW KOREAN REGULATIONS?	WE DO NOT PROVIDE TAX ADVICE, BUT GENERALLY PARTNERSHIPS, LIMITED LIABILITY COMPANIES, UNIT TRUSTS, HOLDING COMPANIES AND MUTUAL FUNDS WITH LESS THAN 100 INVESTORS ARE CONSIDERED OIVS. IT IS THE RESPONSIBILITY OF EACH ENTITY TO CORRECTLY DETERMINE IF THEY ARE AN OIV. NEITHER BNYM NOR KSD WILL BE ABLE TO VALIDATE THESE CATEGORIZATIONS.				
WHAT TYPES OF ENTITIES ARE CONSIDERED OPCIVS UNDER THE INTENTIONS OF THE NEW KOREAN REGULATIONS?	WE DO NOT PROVIDE TAX ADVICE, BUT GENERALLY HOLDING COMPANIES AND MUTUAL FUNDS WITH MORE THAN 100 INVESTORS WHICH WERE NOT PART OF A PRIVATE PLACEMENT ARE CONSIDERED OPCIVS. IT IS THE RESPONSIBILITY OF EACH ENTITY TO CORRECTLY DETERMINE IF THEY ARE AN OPCIV. NEITHER BNYM NOR KSD WILL BE ABLE TO VALIDATE THESE CATEGORIZATIONS.				

#### Warning and Disclaimer:

The information and data contained in this Notice is based on information obtained from multiple sources believed to be reliable. However, Citibank, N.A. 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.

### (YOUR COMPANY LETTERHEAD)

#### **APPENDIX A - WITHHOLDING CERTIFICATION**

To:	90 Broad S New York,	.A. / GlobeTax treet, 16 <sup>th</sup> Floor NY 10004-2205 I, Republic of		Date:		
Re:	Withholding	g Certification for <b>LG ELEC</b> 1	TRONICS INC - C	COMMON ; (	Cusip # <b>501860</b>	Q103
I/We	the undersig	ned(contact name)	authorized repre	esentative of		
	g ADR(s) at _		LECTRONICS IN	С - СОММО	(dtcc particip N ; Cusip # <b>50</b>	
		(dtcc pts number) coming cash dividend payab low or as provided on the at			4 be paid at th	ne preferred
Ве	ame of neficial Owner	Complete Address (Street / City / State / Zip)	Country of Residence	ADR(s) Held	Tax Rate	Personal ID # (TIN#)
		 Tot	al ADR(s) Held:			
Indem I / We c and I de to me b  Citibank fluctuat penaltie appropr appropr We ask benefici	mification ertify that to the clare that I have y these beneficion. Any funds east thereon. This riate by the Kore riate authorization that Citibank, N al owners' behavior of the control	IF THERE ARE MORE THAN 7 BE DEMATTED SPREADSHEET. PLE AUTHORIZED SIGNATURES TO the best of my knowledge the individe performed all the necessary due all owners.  The liable for failure to secure the perroneously received shall be immore is not tax advice. Please consult y ean Tax Authority. Incorrect claims on (based on Powers of Attorney)  A. apply to the Korean Custodian alf. Please contact the undersigned ADDRESS] should you have any question and the contact the undersigned ADDRESS] should you have any questions.	dual beneficial owner dual beneficial owner diligence to satisfy refund and shall not nediately returned to our tax advisor. All class could result in fines or the custodial/trus abank for the reduced at [SIGNATORY'S T	ors are eligible for any Citibank, N.A. paims are subject and/or penaltit agreement).	or the preferential accuracy of the ir y loss due to foreign blus any interest, act to audit or any clies. We hereby certain ax rate on the about the about the same of the sa	I rates as stated herein information submitted gn exchange additions to tax or control deemed rtify that we have the
	ACT INFO					
POSITI	ON:					
TELEP	HONE #:					
E-MAIL	ADDRESS: _					

SIGNATURE:

#### **RECORD DATE: WINTER 2014**

Please refer to the following chart to determine withholding tax on dividend payments on Korean issues:

COUNTRY	OF RESIDENCE	TOTAL TAX RATE (%)
Koroa Popublic of	Institutional Investors	0.00
Korea, Republic of	Individual Investors	15.40
Kuwait, Mongolia		5.00
Azerbaijan		7.00
Albania, Bahrain, Brazil, Croatia, Czech, Ecuado Kyrgyzstan, Laos, Latvia Myanmar, Nepal, Oman Russia, Saudi Arabia, S Arab Emirates, Vietnam	10.00	
Colombia, Estonia, Iran,	Qatar, Venezuela	11.00
Pakistan	12.50	
Belgium, Canada, Denn France, Germany, Gree Ireland, Israel, Italy, Jap Luxembourg, Malta, Me Zealand, Norway, Pana	an, Kazakhstan, xico, Netherlands, New ma, Papua New Guinea, ovenia, Spain, Sri Lanka, unisia, Ukraine, United	15.00
South Africa, United Sta	tes	16.50
India, Turkey		20.00
Philippines		22.00
Malaysia	Labuan	22.00
ivialaysia	Others	15.00
Other Countries, Non-C	ertified Holders	22.00

PLEASE NOTE: TAX RATES ARE SUBJECT TO CHANGE

■ Enforcement Rules of the Income Tax Act [Form No. 29-13] <Revised on Mar. 14, 2014>

## Report of Overseas Investment Vehicle \*\* Please check the appropriate [ ].

For Overseas Public Collective Investment Vehicle ("OPCIV")	* Please check the appropriate Receipt No.	te [ ].			Rec	eipt Date			(Front)
## If uny core of the following three requirements is not autolicit, single to a conglete's section 2. Occasion Investment Vehicle to the PCPU is an oversees investment vehicle similar to a collective investment vehicle due the Financial Investment Services and Capital Market Act and registered or approved in a tax treaty partner country.  The securities of OFCUV in a not issuad by private placement and the OFCUV has 1600 or more investors (an oversees investment vehicle shall be counted as one investor in this regard) as at the end of preceding fiscal year (or, as at the date of administer of the Report in the OFCUV in ready scheduled).  1	,					ырт Бате			
1.1.   1.2.   2.2.   2.3.	# If any one of the following three  [ ] The OPCIV is an orange Services and Capital  The securities of OI  [ ] investment vehicle shade of submission or	requirements is not satisfic verseas investment vehi Market Act and register PCIV are not issued by hall be counted as one of this Report if the OPC	ed, skip Secti icle similar red or appro y private p investor in CIV is newl	to a to a oved i lacement this ly esta	collective investment a tax treaty partrent and the OPCIV regard) as at the oblished).	ent vehicle er country has 100 end of pre	e under  or moeceding	the Financial ore investors ( fiscal year (o	Investment (an overseas or, as at the
© Name:  ② Name of Representative:  ② Date of Establishment:  ③ Date of Establishment:  ③ Date of Establishment:  ③ No not investment Registration Certificate (IRC), etc.  ⑤ Country of Registration/Approval:  ⑤ Country of Registration/Approval:  ⑥ Type of Entity:  ⑤ Country of Registration/Approval:  ⑤ Type of Entity:  ⑥ Country of Registration/Approval:  ⑤ Type of Investment Amount, etc. By Country  ⑤ Ratio (%)  ⑤ Ratio (%)  ⑥ Ratio (%)  ⑤ Ratio (%)  ⑥ Ra			enicie subje	ect to	any tax treaty prov	isions that	deny ta	ax treaty bene	TITS.
Country of Registration/Approval:  © Type of Eatily: [Corporation   Trust   Partnership   Jothers( )  Total Investment Amount / Ratio   ® Number of Basic Date: )  Total Investment Amount / Ratio   ® Number of Income   Type of I	① Name:	② Name of Represer	ntative:	3	Date of Establishme	ent:			
Registration/Approval:    Registration/Approval:   Gr Registration/Approval:					S		40 F	.10 .	A al 2
Corporation   Trust   Partnership   Others    1-2. Status of Total Investment Amount, etc. By Country   Total Investment Amount / Ratio   Status of Total   Type of Investment   Typ	Registration/Approval:	8 Country Code:							
Total Investment Amount / Ratio    Ratio   Rat	[ ]Corporation [	-		nershi	р [](	Others(			)
© Country, etc.  © Amount (t/mix: )   @ Ratio (%)   @ Ratio (%)   Shumber of Enceme   Type of Income   Type of Type of Income   Type of Income	1-2. Status of Total Investment				I	10			]
The Reporter hereby confirms that it is an overseas public collective investment vehicle which satisfies all of the requirements under each subparagraph of Article 207-8(3) of the Enforcement Decree of the Personal Income Tax Act ("ED-PITA") and the provision to Article 207-8(7) of the ED-CITA") and the provision to Article 138-4(9) of the ED-CITA, and that all information provided above is true without any false statement. The Reporter is aware that if any of the contents of this Report is different for true facts, the amount of withholding tax under this Report may be less than the amount of withholding tax that shall be withheld in accordance with the relevant laws and can not be applied to the non-taxation-tax exemption.  Date  Name  (Signature or Seal)  To:  1. Document which verifies registration with or approval by the relevant financial supervisory authority as a collective investment vehicle, and prospectus.  Report of Overseas Investment Vehicle received from other overseas investment vehicle (if any)  2. Overseas Investment Vehicle other than OPCIV  8 Name:  8 Name of Representative:  8 Date of Establishment:  8 Country of Establishment:  8 Country of Establishment:  9 Country Code:  7 Telephone Number:  8 Address:  9 Country of Establishment:  9 Country Code:  7 Type of Entity:  1 Corporation  1 Trust  1 Partnership  1 Others(  1 Trust Treaty or a Report of Overseas Investment Vehicle and completes this Report of Overseas Investment Vehicle and the Statement of Reneficial owner other overseas investment under the Article 207-2, 207-8 of the Enforcement Decree of the Personal Income Tax Act ("ED-CITA") and the Article 208-4 and 408-6 of the CITA. The Report of Overseas Investment Decree of the Corporate Income Tax Act ("ED-CITA") and the Article 208-4 and 408-6 of the CITA. The Report may be less than the amount of withholding tax under the Article 208-4 and 408-6 of the CITA. The Report may be less than the amount of withholding tax under the Article 208-4 and 408-6 of the CITA. The Report may be le	② Country, etc.	(13) Amount			0	Туре	of	Type of	Type of
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The Reporter hereby confirms that it is an overseas public collective investment vehicle which satisfies all of the requirements under each subparagraph of Article 207-8(3) of the Enforcement Decree of the Personal Income Tax Act ("ED-PITA") and the provision to Article 207-8(7) of the ED-CITA") and the provision to Article 138-4(9) of the ED-CITA, and that all information provided above is true without any false statement. The Reporter is aware that if any of the contents of this Report is different for true facts, the amount of withholding tax under this Report may be less than the amount of withholding tax that shall be withheld in accordance with the relevant laws and can not be applied to the non-taxation-tax exemption.  Date  Name  (Signature or Seal)  To:  1. Document which verifies registration with or approval by the relevant financial supervisory authority as a collective investment vehicle, and prospectus.  Report of Overseas Investment Vehicle received from other overseas investment vehicle (if any)  2. Overseas Investment Vehicle other than OPCIV  8 Name:  8 Name of Representative:  8 Date of Establishment:  8 Country of Establishment:  8 Country of Establishment:  9 Country Code:  7 Telephone Number:  8 Address:  9 Country of Establishment:  9 Country Code:  7 Type of Entity:  1 Corporation  1 Trust  1 Partnership  1 Others(  1 Trust Treaty or a Report of Overseas Investment Vehicle and completes this Report of Overseas Investment Vehicle and the Statement of Reneficial owner other overseas investment under the Article 207-2, 207-8 of the Enforcement Decree of the Personal Income Tax Act ("ED-CITA") and the Article 208-4 and 408-6 of the CITA. The Report of Overseas Investment Decree of the Corporate Income Tax Act ("ED-CITA") and the Article 208-4 and 408-6 of the CITA. The Report may be less than the amount of withholding tax under the Article 208-4 and 408-6 of the CITA. The Report may be less than the amount of withholding tax under the Article 208-4 and 408-6 of the CITA. The Report may be le									
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each subparagraph of Article 207-8(3) of the Enforcement Decree of the Personal Income Tax Act ("ED-PITA") and the provision to Article 207-2(9) of the ED-PITA and each subparagraph of Article 138-7(3) of the Enforcement Decree of the Corporate Income Tax Act ("ED-PITA") and the provision to Article 138-4(9) of the ED-CITA, and that all information provided above is true without any false statement. The Reporter is aware that if any of the contents of this Report is different from true facts, the amount of withholding tax under this Report may be less than the amount of withholding tax that shall be withheld in accordance with the relevant laws and can not be applied to the non-taxation-tax exemption.  Date  Name  (Signature or Seal)  To:  Attachment  1. Document which verifies registration with or approval by the relevant financial supervisory authority as a collective investment vehicle, and prospectus 2. Report of Overseas Investment Vehicle received from other overseas investment vehicle (if any)  2. Overseas Investment Vehicle other than OPCIV  8 Name:  9 Name of Representative:  20 Date of Establishment:  21 Telephone Number:  22 Country of Establishment:  23 Address:  24 Country of Establishment:  25 Country Code:  26 Type of Entity:  [ ] Corporation  [ ] Trust  [ ] Partnership  [ ] Others(  ))  The Reporter hereby confirms that it receives an Application for Entitlement to Reduced Tax Rate on Domestic Source Income, an Application of Non-Taxation-Tax Exemption on Korean Source Income under the Tax Treaty or a Report of Overseas Investment Vehicle and completes this Report of Overseas Investment Vehicle and the Statement of Beneficial Owner without any false statement under the Article 207-2, 207-8 of the Enforcement Evere of the Personal Income Tax Act ("ED-PITA") and the Article 18-4, and 18-4 of the Enforcement Decree of the Corporate Income Tax Act ("ED-PITA") and the Article 207-2, 207-8 of the Enforcement Decree of the Corporate Income Tax Act ("ED-PITA") and the Article 207-2, 207-8 of the Enforce	① Total		1009	%					
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® Name:     ® Name of Representative:     ② Date of Establishment:     ② No. of Investment Registration Certificate (IRC), etc:       ② Telephone Number:     ② Address:       ② Country of Establishment:     ② Country Code:       ③ Type of Entity:     [] Jearnership     [] Jothers(       [] Corporation     [] Trust     [] Partnership     [] Jothers(       [] The Reporter hereby confirms that it receives an Application for Entitlement to Reduced Tax Rate on Domestic Source Income, an Application of Non-Taxation-Tax Exemption on Korean Source Income under the Tax Treaty or a Report of Overseas Investment Vehicle and completes this Report of Overseas Investment Vehicle and the Statement of Beneficial Owner without any false statement under the Article 207-2, 207-8 of the Enforcement Decree of the Personal Income Tax Act ("ED-PITA") and the Article 156-2 and 156-6 of the PITA and the Article 138-4, 138-7 of the Enforcement Decree of the Corporate Income Tax Act ("ED-CITA") and the Article 98-4 and 98-6 of the CITA. The Reporter is aware that if any of the contents of this Report is different from true facts, the amount of withholding tax under this Report may be less than the amount of withholding tax that shall be withheld in accordance with the relevant laws and can not be applied to the non-taxation-tax exemption.       Date     Name     (Signature or Seal)       Name     (Signature or Seal)       To:     Attachment     Schedule of Beneficial Owners, and Report of Overseas Investment Vehicle received from other overseas investment vehicle (if any)       Attorney     [] Tax Administrator     [] Others       Attorney     [	Attachment collective i	nvestment vehicle, and	prospectus	-					hority as a
® Name:       ® Name of Representative:       ② Date of Establishment:       ② No. of Investment Registration Certificate (IRC), etc:         ② Telephone Number:       ② Address:         ② Country of Establishment:       ② Country Code:         ③ Type of Entity:       [] Jothers(       )         The Reporter hereby confirms that it receives an Application for Entitlement to Reduced Tax Rate on Domestic Source Income, an Application of Non-Taxation-Tax Exemption on Korean Source Income under the Tax Treaty or a Report of Overseas Investment Vehicle from a beneficial Owner without any false statement under the Article 207-2, 207-8 of the Enforcement Decree of the Personal Income Tax Act ("ED-PITA") and the Article 156-2 and 156-6 of the PITA and the Article 138-4, 138-7 of the Enforcement Decree of the Corporate Income Tax Act ("ED-CITA") and the Article 98-4 and 98-6 of the CITA. The Reporter is aware that if any of the contents of this Report is different from true facts, the amount of withholding tax under this Report may be less than the amount of withholding tax that shall be withheld in accordance with the relevant laws and can not be applied to the non-taxation-tax exemption.       Date       Name       (Signature or Seal)         Attackment       Schedule of Beneficial Owners, and Report of Overseas Investment Vehicle received from other overseas investment vehicle (if any)         Attackment       Schedule of Beneficial Owners, and Report of Overseas Investment Vehicle received from other overseas investment vehicle (if any)         Attackment       Schedule of Beneficial Owners, and Report of Overseas Investment Vehicle received from other ove	2 Overseas Investment	Vehicle other tha	an OPCIV	/				<u> </u>	
② Country of Establishment: ② Type of Entity:  [ ] Corporation [ ] Trust [ ] Partnership [ ] Others( )  The Reporter hereby confirms that it receives an Application for Entitlement to Reduced Tax Rate on Domestic Source Income, an Application of Non-Taxation-Tax Exemption on Korean Source Income under the Tax Treaty or a Report of Overseas Investment Vehicle from a beneficial owner or other overseas investment vehicle and completes this Report of Overseas Investment Vehicle and the Statement of Beneficial Owner without any false statement under the Article 207-2, 207-8 of the Enforcement Decree of the Personal Income Tax Act ("ED-PITA") and the Article 156-2 and 156-6 of the PITA and the Article 138-4, 138-7 of the Enforcement Decree of the Corporate Income Tax Act ("ED-CITA") and the Article 98-4 and 98-6 of the CITA. The Reporter is aware that if any of the contents of this Report is different from true facts, the amount of withholding tax under this Report may be less than the amount of withholding tax that shall be withheld in accordance with the relevant laws and can not be applied to the non-taxation-tax exemption.  Date  Name  (Signature or Seal)  To:  Attachment Schedule of Beneficial Owners, and Report of Overseas Investment Vehicle received from other overseas investment vehicle (if any)  Attorney  [ ] Tax Administrator [ ] Others					Date of Establishme	ent:			
Type of Entity:  [] Corporation [] Trust [] Partnership [] Others()  The Reporter hereby confirms that it receives an Application for Entitlement to Reduced Tax Rate on Domestic Source Income, an Application of Non-Taxation·Tax Exemption on Korean Source Income under the Tax Treaty or a Report of Overseas Investment Vehicle from a beneficial owner or other overseas investment vehicle and completes this Report of Overseas Investment Vehicle and the Statement of Beneficial Owner without any false statement under the Article 207-2, 207-8 of the Enforcement Decree of the Personal Income Tax Act ("ED-PITA") and the Article 156-6 of the PITA and the Article 138-4, 138-7 of the Enforcement Decree of the Corporate Income Tax Act ("ED-CITA") and the Article 98-4 and 98-6 of the CITA. The Reporter is aware that if any of the contents of this Report is different from true facts, the amount of withholding tax under this Report may be less than the amount of withholding tax that shall be withheld in accordance with the relevant laws and can not be applied to the non-taxation-tax exemption.  Date  Name  (Signature or Seal)  To:  Attachment   Schedule of Beneficial Owners, and Report of Overseas Investment Vehicle received from other overseas investment vehicle (if any)  Attorney   Type:   Type:   Name of Individual or Corporation:   Substitution No. (Resident Registration No.):	Telephone Number:     Telephone Numb	23 Address:							
The Reporter hereby confirms that it receives an Application for Entitlement to Reduced Tax Rate on Domestic Source Income, an Application of Non-Taxation-Tax Exemption on Korean Source Income under the Tax Treaty or a Report of Overseas Investment Vehicle from a beneficial owner or other overseas investment vehicle and completes this Report of Overseas Investment Vehicle and the Statement of Beneficial Owner without any false statement under the Article 207-2, 207-8 of the Enforcement Decree of the Personal Income Tax Act ("ED-PITA") and the Article 156-2 and 156-6 of the PITA and the Article 138-4, 138-7 of the Enforcement Decree of the Corporate Income Tax Act ("ED-CITA") and the Article 98-4 and 98-6 of the CITA. The Reporter is aware that if any of the contents of this Report is different from true facts, the amount of withholding tax under this Report may be less than the amount of withholding tax that shall be withheld in accordance with the relevant laws and can not be applied to the non-taxation-tax exemption.  Date  Name  (Signature or Seal)  To:  Attachment Schedule of Beneficial Owners, and Report of Overseas Investment Vehicle received from other overseas investment vehicle (if any)  Attorney  in-Fact Tax Administrator of Business:				25	Country Code:				
Application of Non-Taxation-Tax Exemption on Korean Source Income under the Tax Treaty or a Report of Overseas Investment Vehicle from a beneficial owner or other overseas investment vehicle and completes this Report of Overseas Investment Vehicle and the Statement of Beneficial Owner without any false statement under the Article 207-2, 207-8 of the Enforcement Decree of the Personal Income Tax Act ("ED-PITA") and the Article 156-2 and 156-6 of the PITA and the Article 138-4, 138-7 of the Enforcement Decree of the Corporate Income Tax Act ("ED-CITA") and the Article 98-4 and 98-6 of the CITA. The Reporter is aware that if any of the contents of this Report is different from true facts, the amount of withholding tax under this Report may be less than the amount of withholding tax that shall be withheld in accordance with the relevant laws and can not be applied to the non-taxation-tax exemption.  Date  Name  (Signature or Seal)  To:  Attachment Schedule of Beneficial Owners, and Report of Overseas Investment Vehicle received from other overseas investment vehicle (if any)  Attorney in-Fact Type:  [] Tax Administrator [] Others    Wattachment   Schedule of Business:   Wattachment   Wattach		]Trust	[ ]Part	nershi	р [](	Others(			)
To:  Attachment   Schedule of Beneficial Owners, and Report of Overseas Investment Vehicle received from other overseas investment vehicle (if any)  Attomey in-Fact   ② Type:	Application of Non-Taxation Tax Vehicle from a beneficial owner the Statement of Beneficial Ow Personal Income Tax Act ("ED- Decree of the Corporate Income of the contents of this Report amount of withholding tax that	x Exemption on Korean or other overseas inversely one without any false PITA") and the Article Tax Act ("ED-CITA") is different from true false.	n Source In estment veh statement v 156-2 and and the Ar facts, the a cordance w	ncome icle a under 156-6 ticle 9 mount	under the Tax T nd completes this I the Article 207-2, of the PITA and t 98-4 and 98-6 of the of withholding tax	reaty or a Report of 207-8 of he Article e CITA. ' x under the	A Report Oversea of the End 138-4, The Report of the Repor	t of Overseas is Investment inforcement De 138-7 of the corter is aware ort may be le ied to the nor	s Investment Vehicle and ecree of the Enforcement e that if any ess than the n-taxation-tax
Attomey -in-Fact    Type:	To :		Name					(Signat	ture or Seal)
Attomey -in-Fact    Type:	Attachment Schedule of Ben	eficial Owners, and Report	of Overseas	Invest	ment Vehicle received	from other	overseas	investment veh	nicle (if any)
30 Address or Place of Business:	Attorney Type:  Attorney Tax Administrate	28				29 Bu	isiness l	Registration N	• • • • • • • • • • • • • • • • • • • •
	Address or Place	of Business:			010	Imm > 20-	7mm[HI		(재화요프\]

#### **Filing Instruction**

- \*\* The filing date is the date on which the withholding agent (or overseas investment vehicle) files this Report as received from another relevant overseas investment vehicle and the filing number is the serial number assigned to such filing.
- 1. This Report shall be prepared and submitted by an overseas investment vehicle if a Korean source income is paid through such overseas investment vehicle. In this regard, if the beneficial owners include both non-resident individuals and foreign corporations, this Report shall be prepared on a combined basis and not for each group separately. In the case where additional Korean source income is received after the submission of this Report, a new Report shall be prepared and submitted in any one of the following cases:
- If an overseas investment vehicle changes its name, address, country of residence, entity type, telephone number or tax rate to be applied, etc.;
- ii) If an overseas investment vehicle, which was initially reported as an overseas public collective investment vehicle, has lost such status as a result of not satisfying the relevant requirements such as regarding number of investors; or
- iii) If three years have elapsed since the submission of this Report.
- 2. Items ① and ⑧. Enter the full English name of the overseas investment vehicle or the initials of the overseas investment vehicle with its full name in parentheses.
- 3. Items ② and ⑨. If the representative is a foreigner; enter his/her full English name as shown in his/her passport.
- 4. Items ③ and ②). Enter the date of establishment of overseas investment vehicle in the following format: YYYY-MM-DD.
- 5. Items ④ and ②. Enter the Number of the investment registration certificate (IRC No.) of the overseas investment vehicle issued by the Korean Financial Supervisory Service. In the absence of IRC No., enter the Taxpayer Identification Number in the country of residence (If the overseas investment vehicle has Business Registration Number issued by the National Tax Service, enter it)
- 6. Items ⑤ and ②. Enter current telephone number including the country code and area code, if any.
- 7. Items ⑥ and ②. Enter the overseas investment vehicle's address in English in the following order: street number, street name, city, state, postal code and country. Please do not enter a PO Box.
- 8. Items ⑦, ⑧, ⑳ and ㉑. Enter the country abbreviation and code from ISO Country Codes set by the International Organization for Standardization (ISO).
- 9. Item ⑤. Enter the relevant foreign statutory provisions in English which requires that the overseas public collective investment vehicle shall be registered with or approved by the financial supervisory authority of the tax treaty partner country.
- 10. Item ①. Enter the English name of the financial supervisory authority of the tax treaty partner country, which has jurisdiction over the registration or approval thereof.
- 11. Items ① and ②6. Check the applicable type of entity. Check "Partnership" if the investment vehicle is a corporation but is subject to partnership taxation in its country of residence under which its shareholders or investors are directly subject to tax liability. If the investment vehicle is not a corporation, fund or partnership, check "Others" and specify the type in parentheses.
- 12. Section 1-2. Enter the relevant information by classifying beneficial owners by each country of residence. If, however, it is considerably difficult to classify the beneficial owners by each country at the time of submitting this Report, the Section 1-2 can be prepared and submitted using the information as at the end of the preceding quarter from which this Report is submitted or at the time that overseas investment vehicle can classify beneficial owners within the preceding three months from which this Report is submitted on a retroactive basis.
- 13. Item ②. Enter country abbreviations as determined by the ISO or 'ZZ' if the residence country of the beneficial owner is not identifiable. If the investor is other overseas investment vehicle, enter the name of such overseas investment vehicle as indicated in the Report of Overseas Investment Vehicle received from such overseas investment vehicle, instead of classifying the beneficial owners behind such overseas investment vehicle by each residence country, and enter "1" for the number of beneficial owners. Please prepare separate attachment if the space given in the form is insufficient for the number of countries of residence of beneficial owners.
- 14. Item ⑥. Enter the applicable reduced tax rate[or 0(zero) tax rate on applying non-taxation-tax exemption] under the tax treaty between Korea and the country in which the beneficial owner resides. If the reduced tax rate under the tax treaty does not include local income surtax, enter a tax rate reflecting the tax rate under Article 92(1) and 103-20(1) of the Local Tax Act. However, if there is no tax treaty between Korea and the country in which the beneficial owner resides or the beneficial owner's residence country is unidentifiable, please enter a tax rate of Article 156(1) of the PITA or Article 98(1) of the CITA reflecting the tax rate under Article 92(1) and 103-20(1) of the Local Tax Act. If the investors include other overseas investment vehicle, enter the sum in the column of ⑩ Tax Rates on the Schedule of Beneficial Owners as attached to the Report of Overseas Investment Vehicle received from such overseas investment vehicle (in case of a public overseas collective investment vehicle, the sum of tax rates applicable to each type of income as recorded in the column of ⑯ Tax Rate To Be Applied on the Report of Overseas Investment Vehicle).
- 15. Item ①, Enter the sum of ③ Total Investment Amount and ⑤ Number of Beneficial Owners. For the sum of ⑥ Tax Rate To Be Applied of each income type, please enter the sum of the applicable tax rates[or 0(zero) tax rate on applying non-taxation-tax exemption] for each country multiplied by the investment ratio of each country (including, if the investors include other overseas investment vehicle, the tax rate applicable to the overseas investment vehicle multiplied by the investment ratio thereof). The sum in the column of ④ Total Investment Ratios shall always equal to 100%.
- 16. If the sum in the column of ① Total Investment Ratios or ⑥ Tax Rate To Be Applied is an indefinite decimal, please indicate the ratio or tax rate as a percentage which is rounded up to the nearest ten thousandth place (e.g., XX.XXXX%).
- 17. Items ② through ③ should be completed when an attorney-in-fact submits this Report on behalf of the overseas investment vehicle. An attorney-in-fact other than a tax administrator under Article 82 of the Framework Act on National Taxes is required to submit the Power of Attorney together with a Korean translation.
- 18. The withholding agent(the income payer) or overseas investment vehicle who received this Report (including any attachments thereto) is required to maintain it for five years starting from the day following the withholding tax payment due date under Article 156(1) of the PITA or Article 98(1) of the CITA and submit it upon request to the Head of the district tax office having jurisdiction over the tax payment place of the withholding agent. Meanwhile, the income payer have to submit this Report by the ninth day of the month following the month in which the date of payment falls under the Article 207-2(1) of the ED-PITA and the Article 138-4(1) of the ED-CITA

#### Schedule of Beneficial Owners (Type of Income

(Front)

									(Unit: %
① Classif ication	② No.	Name of individual or overseas investment vehicle	④ Taxpayer Identification No.	⑤ Address	G Country of Residence	Date of Birth	8 Tax Rate To Be Applied	9 Investment Ratio	Tax Rate (8 × 9)

11 Total

#### Filing Instruction

- 1. This Schedule shall be prepared and submitted by an overseas investment vehicle for each type of income and attached to the Report of Overseas Investment Vehicle, if a Korean source income is paid through such overseas investment vehicle. In this regard, if the beneficial owners include both non-resident individuals and foreign corporations, this Schedule shall be prepared on a combined basis and not for each group separately, and separate attachment may be prepared in same format if the space provided in the Form is insufficient for the number of beneficial owners of the overseas investment vehicle.
- 2. Item ①. Mark "V" if the investor is an overseas investment vehicle and mark "BO" if the investor is a beneficial owner. If the investors of the subject overseas investment vehicle include both overseas investment vehicles and beneficial owners, please list beneficial owners first and then overseas investment vehicles.
- 3. Item 2. Enter a serial number for each group of overseas investment vehicles and beneficial owners.
- 4. Item ③. Enter the name of individual or the full English name of the overseas investment vehicle or the initials of the overseas investment vehicle with its full name in parentheses.
- 5. Item ④. Enter Taxpayer Identification No. If investor is a non-resident individual, refer to the below table. If investor is a company, enter the number of the investment registration certificate (IRC No.). In the absence of IRC No., enter the Taxpayer Identification No. in the country of residence (If the company has Business Registration No. issued by Korean tax authority, enter it).

	Classification	Identification Number
(1)	Principle	Resident Registration No. or Business Registration No. issued by Korean tax authority
(2)	In the absence of (1)	[For individual] Registration number under the Report of Domestic Residence (for a Korean national residing overseas or a Korean with foreign nationality), foreigner registration number under the Foreign Registration Card (for a foreigner) or passport number in the absence of the former two
(3)	In the absence of (1) and (2)	Investment registration number from an investment registration certificate or Taxpayer Identification No. in the country of residence

- 6. Item ⑤. Enter the address in English in the following order: street number, street name, city, state, postal code and country. Please do not enter a PO Box.
- 7. Item ⑥. Enter country abbreviations as determined by the ISO or 'ZZ' if the residence country of the beneficial owner is not identifiable.
- 8. Item ⑦. Enter the date of birth if the beneficial owner is non-resident individual (for example, enter "20060101" if the date of birth is January 1, 2006).
- 9. Item ⑧. Enter the applicable reduced tax rate[or 0(zero) tax rate on applying non-taxation-tax exemption] under the tax treaty between Korea and the country in which the beneficial owner resides. If the reduced tax rate under the tax treaty does not include local income surtax, enter a tax rate reflecting the tax rate under Article 92(1) and 103-20(1) of the Local Tax Act. However, if there is no tax treaty between Korea and the country in which the beneficial owner resides or the beneficial owner's residence country is unidentifiable, please enter a tax rate of Article 156(1) of the PITA or Article 98(1) of the CITA reflecting the tax rate under Article 92(1) and 103-20(1) of the Local Tax Act. If the investors include other overseas investment vehicle, enter the sum in the column of ⑩ Total on the Schedule of Beneficial Owners as attached to the Report of Overseas Investment Vehicle received from such overseas investment vehicle. In case of a public overseas collective investment vehicle, enter the sum of tax rates applicable to each type of income as recorded in the column of ⑯ Tax Rate To Be Applied on the Report of Overseas Investment Vehicle received from such overseas public collective investment vehicle.
- 10. Item ③. Enter the investment ratio of each beneficial owner or other overseas investment vehicle investing in the subject overseas investment vehicle. The sum of such investment ratios shall always equal to 100%.
- 11. Item ①. Enter the tax rate which is calculated by multiplying ⑧ Tax Rate To Be Applied[or 0(zero) tax rate on applying non-taxation-tax exemption] by ⑨ Investment Ratio for each beneficial owner or overseas investment vehicle.
- 12. Item ①. Enter the sum of Tax Rates applicable to each respective beneficial owners and overseas investment vehicles. If ③ Investment ratio, ① Tax Rate, or ① Sum of Tax Rates is an indefinite decimal, please indicate the ratio or tax rate as a percentage which is rounded up to the nearest ten thousandth place (e.g., XX.XXXX%).
- 13. The withholding agent(the income payer) or overseas investment vehicle who received this Report (including any attachments thereto) is required to maintain it for five years starting from the day following the withholding tax payment due date under Article 156(1) of the PITA or Article 98(1) of the CITA and submit it upon request to the Head of the district tax office having jurisdiction over the tax payment place of the withholding agent. Meanwhile, the income payer have to submit this Report by the ninth day of the month following the month in which the date of payment falls under the Article 207-2(1) of the ED-PITA and the Article 138-4(1) of the ED-CITA

■ Enforcement Rules of the Corporate Income Tax Act [Form No. 72-2] (Established on Feb. 28, 2012)

## Application for Entitlement to Reduced Tax Rate on Domestic Source Income (for Foreign Corporation)

*Please check the a	ppropriate [ ].			(Front)
Filing No.			Filing Date	
Applicant Inform	nation			
①Type of Entity	[ ] Ov	rporation, [ ] Pension, [ ] Fund, erseas investment vehicle recognized as be elevant tax treaty provisions: ners (	peneficial owner under tax treaty ) )	
2Name of Corpor	ration	6Address		
3Name of Repres	entative	7Country of Residence		
4 Taxpayer Identii	fication No.	8Country Code		
5 Date of Incorpor	ration	9Telephone Number		
3. Determination o  11A pension estable Officials Pension A Benefits Act, etc.: 12A fund that is estated in the second of the se	Act, Armed Forces Personn Yes [ ] No [ ] stablished as a non-profit or ] No [ ] estment vehicle recognized [ ] No [ ] on liable to tax under the tax on a beneficial owner of don at or its income subject to the es [ ] No [ ] by confirms that with regar icle 138-7 of the Enforcen	: Article Paragraph Subpar Article Paragraph Subpar	partner country, which does not does no	Tax Rate % Tax Rate % Tax Rate % Sion Act, Public of Workers' Retirement listribute its profits to in which it is That deny (restrict) tax Torate Income Tax Act of followings provided
authorized to sign 1) The Applican Application m 2) The Applican agent shall ap established.  3) The Applican	this Application on behalf of t is aware that if any of the hay be less than the amount t is aware that if it answers ply the reduced tax rate und t is aware that if it answers	of the beneficial owner) of all the domestic contents of this Application is different fit of withholding tax that shall be withheld is "Yes" to any one of 11through 13above der the tax treaty between Korea and the observations of the Applicant shall not apply.	ic source income which this appli rom true facts, the amount of with I in accordance with the relevant I satisfying the requirements there country in which the relevant pen	cation relates.  sholding tax under this laws.  of, the withholding sion, etc. is
		Date		
	Applicant (Re	epresentative)	(Sig	nature or Seal)
То.				
Attachment: Do	ocuments substantiating the	e fact that the Applicant falls under any of	f the categories (1)through (13)	
Attorney-in-Fact	① Type [ ] Tax Administrator [ ] Others	® Name of Individual or  Corporation	Business Registration No. (Resid	lent Registration No.)
	Address or Place of I	Business		

#### **Filing Instruction**

% The filing date is the date on which the withholding agent files this Application as received from the beneficial owner and the filing number is the serial number assigned to such filing.

- 1. This Application shall be submitted by a foreign corporation which wishes to apply a reduced tax rate under the relevant tax treaty applicable to its Korean source income, and this form shall not be submitted by a foreign corporation which is exempt from Korean withholding tax pursuant to the relevant tax treaty. In the case where the Applicant receives additional Korean source income after the submission of this Application whereby a reduced tax rate under the relevant tax treaty was applied to the previous Korean source income, the Applicant is required to prepare and file a new application if there is any change in its corporate name, representative, taxpayer ID No., address, country of residence and telephone number, etc., or if three years have elapsed since the submission of this Application.
- 2. Item ① Check the appropriate type of entity that applies. If the Applicant is a pension, fund or overseas investment vehicle falling under any one of the Items under Article 138-7(5) of the ED-CITA, check the appropriate [space]. Also, enter the relevant tax treaty provisions in the parentheses in the case of an overseas investment vehicle. For other types of Applicants such as a government, local government or central bank, etc., select "Others" and specify the type in parentheses.
- 3. Item (2) Enter the Applicant's full name in English.
- 4. Item (3) If the representative is a foreigner; enter his/her full English name as shown in his/her passport.
- 5. Item ④ Enter the investment registration number from the investment registration certificate. In the absence of such number, enter the Applicant's taxpayer ID No. issued by the tax authority of its residence country (or, enter the Applicant's Business Registration No. if it is issued by a district tax office in Korea).
- 6. Item (5) Enter the Applicant's date of incorporation in the following format: YYYY-MM-DD.
- 7. Item (6) Enter the Applicant's address in English in the following order: street number, street name, city, state, postal code and country. Do not enter a PO Box.
- 8. Items 7 and 8 Enter the country abbreviation and code from ISO Country Codes set by the International Organization for Standardization (ISO).
- 9. Item (9) Enter current telephone number including the country code and area code, if any.
- 10. Item (11) Enter the tax treaty and relevant provisions therein to be applied, type of relevant Korean source income and reduced tax rate. If the reduced tax rate under the relevant tax treaty does not include local income surtax, enter a tax rate reflecting the tax rate under Article 89(1) of the Local Tax Act.
- 11. If the Applicant answers "Yes" to any one of ①through ③satisfying the requirement thereof, the reduced tax rate under the tax treaty between Korea and the country in which the Applicant (i.e., the pension, fund or overseas investment vehicle, etc) is established shall be applied.
- 12. If the Applicant answers "No" to any one of (4) and (15) the reduced tax rate under the relevant tax treaty shall not apply.
- 13. For Item (6), confirm whether or not the Applicant or its income is subject to the provisions of the tax treaty between Korea and its country of residence which deny (restrict) the tax treaty benefits. If checked "Yes," the Applicant shall not be entitled to the reduced tax treaty under the tax treaty.
- 14. Items ① through ② should be completed when an attorney-in-fact submits this Application on behalf of the Applicant. An attorney-in-fact other than a tax administrator under Article 82 of the Framework Act on National Taxes is required to submit the Power of Attorney together with a Korean translation.
- 15. The withholding agent or overseas investment vehicle who received this Application (including any attachments thereto) is required to maintain it for five years starting from the day following the withholding tax payment due date under Article 98(1) of the CITA and submit it upon request to the Head of the district tax office having jurisdiction over the tax payment place of the withholding agent.

# Application for Non-Taxation · Tax Exemption of ([] Individual Income Tax [] Corporate Income Tax ) on Korean Source ([] Interest [] Dividend [] Royalties [] Other) Income under the Tax Treaty

** Please check the appropriate [ ]. (Front)									
Receipt No.	1		Receipt Date			Re	quired to be p	rocessed upon submission	
	① Name of Individual (or Corporation)								
Beneficiary	② Business (Resident or Alien) Registration No.								
	3 Address	③ Address (or Location of Business)							
	4 Date of Birth								
	① Name	① Name of Corporation (Korean) (English)							
	8 Name of Representative								
Income Paye	9 Busines	Business (Resident or Alien) Registration No.							
	Address (or Location of Business)								
	11 Interest								
							<u> </u>		
Type of	12 Divider	nds	[ ] Securities Investment Trust [ ] Deemed Dividends [ ] Dividends between Corporations [ ] Other						
Income	(3) Royalti						Other		
	(4) Other		[ ]		L 1 P7 B	[ ] — [			
	- Outer		In	terect	/ Dividend Inc	ome			
					/ Dividend inc	OHE		® Deel name and	
			(15) Accoun	t No.				16 Real name confirmed	
						<b>a</b> -		(Unit: KRW)	
07) Date o	f Payment	(18	B) Amount Paid	(19	(19) Tax Rate	20 Tax to	be Withheld	② Tax Exempted	
2 Basis for Non-Taxation or Tax Exemption Subparagraph ( ), Paragraph ( ), Article ( ) of the Tax Treaty between Korea and ( )					Korea and ( )				
② Covered Period . (Mo.)				(Yr.)		(Mo.)	(Yr.)		
I hereby sub Korean Sour					-			come Tax on Non-Resident's r Corporate Tax Act)" and	
	*		Enforcement Decree		- (0. 30 1) 0		(-		
					Date:				
	Applicant (Beneficiary): (Signature or Seal)						(Signature or Seal)		
					a) Income Pay	er:		(Signature or Seal)	
To The Hea	nd of (		) District T	ax O	ffice				
2	Type of Agent			[ ]Tax Age	ent	[ ]Other			
2	Name of I	ndividu	ual (or Corporation)						
Agent	Business (R	esident	or Alien) Reg. No	).					
	Address (or Location of Business)								
-	Competent District Tax Office								
	_			1 (1	C	1 7 6 4	1 6 . 1	• 1	
Attached Documents	2. A copy	of doc	of Residence" issued			•	•	2	
I hereby confirm the above facts.  Date:									
	Hea	d of	(	,	) District Ta	ax Office	Seal		
* Irrespective of this confirmation of the submitted application, the head of district tax office can correct or determine									

taxes in accordance with relevant laws if the information in this application is found to be different from actual facts.

210mm×297mm[일반용지 60g/m\*(재활용품))

#### Filling Instruction

- \* The applicant or income payer shall not fill in the filing number and filing date.
- 1. This application shall be submitted in the case where non-resident individuals or foreign corporations wish to request for a non-taxation tax exemption under the tax treaty on Korean source interest, dividend, royalties and other incomes which follow Korean tax law or in the case where above income is paid through an Overseas Public Collective Investment Vehicle("OPCIV") and the OPCIV requests for non-taxation tax exemption under the proviso of the Article 207-2(9) of the Enforcement Decree of the Income Tax Act (138-4(9) of the Corporate Tax Act).
- 2. This application shall be prepared in three copies, one of which shall be submitted to an income payer attached with a certificate of residence issued by residence country of the beneficiary (incomes under the Article 119-12(f)(g) of the Income Tax Act can be replaced with a copy of passport or a certificate of immigration that proves immigration for the recent one year from the date of arrival in the Republic of Korea), and the income payer, in turn, shall submit the other two copies to the head of the competent tax office having jurisdiction over the place for tax payment of the income payer by no later than the ninth date of the month following the month to which the date of income payment belongs. An updated application form has to be submitted either 3 years after the date of submission or before the 3 years lapse when a change has occurred in the filing.
- 3. This application shall be null and void in the case the beneficiary submit it without a certificate of residence (incomes under the Article 119-12(f)(g) of the Income Tax Act can be replaced with a copy of passport or a certificate of immigration that proves immigration for the recent one year from the date of arrival in the Republic of Korea) or the information of his/her agent is written in the beneficiary section.
- 4. Check "V" in the relevant type of income.
- 5. Item ①. Enter the beneficiary's name. In case of a foreign corporation, enter corporation name. Enter his/her full name in English as shown in his/her passport.
- 6. Items 2, 9, 26. Refer to the below table.

	Classification	Registration Number		
(1)	Principle	Resident registration number of business registration number		
(2)	When Reg. Num. of (1) is not issued	Enter a report number of the place of residence (a Korean national residing abroad or a foreign nationalit Korean), or passport number (where the report number is not issued).		
(3)	When Reg. Num. of (1), (2) is not issued	Enter an investment registration number, or taxpayer identification number (where the investment registration number is not issued).		

- 7. Item 3. Enter the beneficiary's address in the following order: street number, street name, city, state, postal code and country.
- 8. Item ④. Enter the date of birth if the beneficiary is non-resident individual (for example, enter "20060101" if the date of birth is January 1, 2006).
- 9. Items ⑤ and ⑥. Enter the country abbreviation and code from ISO Country Codes set by the International Organization for Standardization (ISO).
- 10. Item ①. Enter a corporation name both in Korean and English where an income payer is a corporation and enter a shop name both in Korean and English where an income payer is an individual. Item ⑧. Enter the name of representative and business operator.
- 11. Item (1). Enter the headquarter location of income payer, or the address of the income payer where the business location does not exist.
- 12. Items ①~①. Check [ ] in the relevant item category.
- 13. Item (6). Enter 'real name' for a real name account that confirmed real name or conversed by real name and enter 'non-real name' for other accounts. Where an interest or a dividend has been distributed to a direct owner of bond-security that have already been issued and he/she confirmed that he/she is an actual owner of account, enter 'real name.' Except for this case, enter 'non-real name'.
- 14. Item ③. Enter Korean won by exchange rate at the moment of application. In the case of non-taxation tax exemption amount that are confirmed later, the calculation shall be done by Korean won by exchange rate at the moment of payment of income.
- 15. Items ②→② shall be filled where an agent files this application. Please submit a letter of attorney which proves beneficiary-agent relationship along with a copy of Korean translation where this application is filled by an agent other than a tax manager under the Article 82 of the Framework Act on National Taxes.
- 16. The income payer who receives this application (including its attached document when it exist) shall submit the application to the head of the competent tax office having jurisdiction over the place for tax payment of the income payer no later than the ninth date of the month following the month to which the date of income payment belongs under the Article 207-2(1) of the Enforcement Decree of Income Tax Act(the Article of 138-4(1) of the Enforcement Decree of Corporate Tax Act.)
- 17. The income payer or foreign investment vehicle that receives this application (including its attached document when it exist) shall keep this application for five years from the following date of period stated under the Article 207-2(1) of the Enforcement Decree of the Income Tax Act(the Article 138-4(1) of the Enforcement Decree of the Corporate Tax Act) and submit it to the head of the competent tax office having jurisdiction over the place for tax payment of the income payer when the head of the competent tax office requires to submit the application.