



*Important Notice*  
The Depository Trust Company

<b>B #:</b>	0826-14
<b>Date:</b>	April 22, 2014
<b>To:</b>	All Participants
<b>Category:</b>	Dividends
<b>From:</b>	International Services
<b>Attention:</b>	Operations, Reorg & Dividend Managers, Partners & Cashiers
<b>Subject:</b>	<b>Tax Relief</b> – Country: Czech Republic <b>KOMERCNI BANKA – 144A CUSIP:</b> 500459102 <b>Record Date:</b> 04/23/2014 <b>Payable Date:</b> 06/12/2014 <b>EDS Cut-Off:</b> 05/02/2014 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) web site to certify all or a portion of their position entitled to the applicable withholding tax rate. Participants are urged to consult the PTS or PBS function TAXI or TaxInfo<sup>SM</sup> 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<sup>SM</sup> in PTS or PBS respectively.

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

**Important Legal Information:** *The Depository Trust Company ("DTC") does not represent or warrant the accuracy, adequacy, timeliness, completeness or fitness for any particular purpose of the information contained in this communication, which is based in part on information obtained from third parties and not independently verified by DTC and which is provided as is. The information contained in this communication is not intended to be a substitute for obtaining tax advice from an appropriate professional advisor. In providing this communication, DTC shall not be liable for (1) any loss resulting directly or indirectly from mistakes, errors, omissions, interruptions, delays or defects in such communication, unless caused directly by gross negligence or willful misconduct on the part of DTC, and (2) any special, consequential, exemplary, incidental or punitive damages.*

*To ensure compliance with Internal Revenue Service Circular 230, you are hereby notified that: (a) any discussion of federal tax issues contained or referred to herein is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties that may be imposed under the Internal Revenue Code; and (b) as a matter of policy, DTC does not provide tax, legal or accounting advice and accordingly, you should consult your own tax, legal and accounting advisor before engaging in any transaction.*

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Non-Confidential



BNY MELLON

**Komerční Banka – 144A** has announced a cash dividend. BNY Mellon acts as the sole Depositary for the company's Depositary Share ("DS") program.

Holders of Komerční Banka may be eligible to receive favorable or reduced withholding tax relief. Further details on eligibility, documentation, limitations, fees, charges and deadlines are included below.

On Depositary Share Pay Date, all eligible holders will have the opportunity to receive their full treaty benefits as outlined in the Relief at Source (EDS) Eligibility Matrix. All uncertified holders will receive this dividend net of the full Czech statutory withholding tax of 35% with the possibility to reclaim as outlined in the Long Form Eligibility Matrix.

DIVIDEND EVENT DETAILS	
COUNTRY OF ISSUANCE	CZECH REPUBLIC
ISSUE	KOMERCNI BANKA – 144A
CUSIP#	500459102
DEPOSITARY	BNY MELLON
DS RECORD DATE	APRIL 23, 2014
DS PAY DATE	JUNE 12, 2014
DS GROSS DIVIDEND RATE ON PAY DATE	TBA
ORD GROSS DIVIDEND RATE ON PAY DATE	CZK 230.00
RATIO	1 ORD : 3 DSs
WHT RATE	35%

## CHARGES & DEADLINES\*

FILING METHOD	BATCH / PAYMENT METHOD	RECLAIM RATE	DEPOSITARY SERVICE CHARGE	MINIMUM SERVICE CHARGE PER BENEFICIAL OWNER	FINAL SUBMISSION DEADLINE (ALL TIMES EST)
RELIEF AT SOURCE	PAYMENT ON DS PAY DATE	20-30%	\$0.0075 PER DS	USD \$0.00	MAY 2, 2014 8:00 P.M.
PRIMARY LONG FORM BATCH	POST PAY DATE PAYMENT / CHECK	20% - 35%	\$0.0075 PER DS	USD \$25.00 + CUSTODIAL SERVICE FEE CZK 1500 (APPROXIMATELY USD \$75.50)	SEPTEMBER 12, 2014 8:00 P.M.
LONG FORM	POST PAY DATE PAYMENT / CHECK	20% - 35%	\$0.0075 PER DS		FEBRUARY 28, 2017 8:00 P.M.

**\* RECLAIMS RECEIVED POST DEADLINE WILL BE INELIGIBLE FOR TAX RELIEF PROCESS DESCRIBED IN THIS ANNOUNCEMENT.**

### Agreements, Representations and Indemnification

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. We hereby accept and agree to pay the fees of BNY Mellon of \$0.0075 per Depositary Share for Relief at Source and Long Form and any other charges, fees or expenses payable by or due to BNY Mellon or its agents, including any custodian, in connection with the tax reclaim process, or to tax authorities or regulators (which fees, charges or expenses may be deducted from the dividend or any other distribution or by billing or otherwise in BNY Mellon's discretion). We hereby agree that any such fees, charges or expenses may be due and payable whether or not a successful reduction in rate or reclamation is obtained. We hereby agree that fees paid to BNY Mellon may be shared with its agents.

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 by the applicable custodian and tax regulators, and that BNY Mellon is not providing any legal, tax, accounting or other professional advice on these matters and has expressly disclaimed any liability whatsoever for any loss howsoever arising from or in reliance hereto.

We certify that to the best of our knowledge that each of the beneficial owners identified above are eligible for the preferential rates as stated herein and we declare that we have performed all the necessary due diligence to satisfy ourselves as to the accuracy of the information submitted to us by these beneficial owners.

We will be fully liable for any and all claims, penalties and / or interest, including without limitation, any foreign exchange fluctuations associated therewith. BNY Mellon shall not be liable for the failure to secure any refund. In consideration of the assistance of BNY Mellon and the custodian in processing such claims, we expressly agree that BNY Mellon and its agents or affiliates shall not have any liability for, and we shall indemnify, defend and hold each of BNY Mellon and its agents and affiliates harmless from and against, any and all loss, liability, damage, judgment, settlement, fine, penalty, demand, claim, cost or expense (including without limitation fees and expenses of defending itself or enforcing this agreement) arising out of or in connection herewith.

## RELIEF AT SOURCE TAX RELIEF ELIGIBILITY MATRIX

RATE DESCRIPTION	RECLAIM RATE	ELIGIBLE RESIDENTS	DOCUMENTATION REQUIRED
<b>UNFAVORABLE – 35% (STATUTORY RATE)</b>	<b>0%</b>	ANY SHAREHOLDER NOT DOMICILED IN A JURISDICTION LISTED AS HAVING A DOUBLE TAXATION TREATY WITH CZECH REPUBLIC.	NONE
<b>FAVORABLE – 15%</b>	<b>20%</b>	ALBANIA, AUSTRALIA, BARBADOS, BELGIUM, BRAZIL, CANADA, DENMARK, EGYPT, ESTONIA, FINLAND, GERMANY, GREECE, HUNGARY, ICELAND, INDONESIA, IRELAND, ISRAEL, ITALY, JAPAN, LATVIA, LITHUANIA, LUXEMBOURG, MACEDONIA, MOLDOVA, NEW ZEALAND, NIGERIA, NORWAY, PHILIPPINES, PORTUGAL, SLOVAKIA, SLOVENIA, SOUTH AFRICA, SPAIN, SRI LANKA, SWITZERLAND, TUNISA, UKRAINE, UNITED KINGDOM, USA	<ol style="list-style-type: none"> <li>1) COVER LETTER</li> <li>2) CERTIFICATE OF TAX RESIDENCE (OR U.S. FORM 6166)</li> <li>3) DECLARATION OF BENEFICIAL OWNERSHIP</li> </ol>
<b>FAVORABLE– 10%</b>	<b>25%</b>	ARMENIA, AUSTRIA, BELARUS, BULGARIA, CHINA, ETHIOPIA, FRANCE, GEORGIA, INDIA, JORDAN, KAZAKHSTAN, SOUTH KOREA, MALAYSIA, MEXICO, MONGOLIA, MOROCCO, NETHERLANDS, NORTH KOREA, PANAMA, ROMANIA, RUSSIA, SERBIA AND MONTENEGRO, SWEDEN, SYRIA, THAILAND, TURKEY, UZBEKISTAN, VENEZUELA, VIETNAM	<ol style="list-style-type: none"> <li>1) COVER LETTER</li> <li>2) CERTIFICATE OF TAX RESIDENCE</li> <li>3) DECLARATION OF BENEFICIAL OWNERSHIP</li> </ol>
<b>FAVORABLE – 8%</b>	<b>27%</b>	AZERBAIJAN	<ol style="list-style-type: none"> <li>1) COVER LETTER</li> <li>2) CERTIFICATE OF TAX RESIDENCE</li> <li>3) DECLARATION OF BENEFICIAL OWNERSHIP</li> </ol>
<b>FAVORABLE– 5%</b>	<b>30%</b>	BAHRAIN, BOSNIA AND HERZEGOVINA, CROATIA, CYPRUS, HONG KONG, KUWAIT, LEBANON, MALTA, POLAND, SAUDI ARABIA, SINGAPORE, TAJIKISTAN, UNITED ARAB EMIRATES	<ol style="list-style-type: none"> <li>1) COVER LETTER</li> <li>2) CERTIFICATE OF TAX RESIDENCE</li> <li>3) DECLARATION OF BENEFICIAL OWNERSHIP</li> </ol>

**PARTICIPATING IN RELIEF AT SOURCE IS WHOLLY VOLUNTARY AND DISCRETIONARY; HOWEVER, IT IS THE ONLY WAY TO OBTAIN THE REDUCED WITHHOLDING TAX RATE ON THE PAYABLE DATE.**

## LONG FORM ELIGIBILITY MATRIX

RATE DESCRIPTION	RECLAIM RATE	ELIGIBLE RESIDENTS	DOCUMENTATION REQUIRED
<b>FAVORABLE – 15%</b>	<b>20%</b>	ALBANIA, AUSTRALIA, BARBADOS, BELGIUM, BRAZIL, CANADA, DENMARK, EGYPT, ESTONIA, FINLAND, GERMANY, GREECE, HUNGARY, ICELAND, INDONESIA, IRELAND, ISRAEL, ITALY, JAPAN, LATVIA, LITHUANIA, LUXEMBOURG, MACEDONIA, MOLDOVA, NEW ZEALAND, NIGERIA, NORWAY, PHILIPPINES, PORTUGAL, SLOVAKIA, SLOVENIA, SOUTH AFRICA, SPAIN, SRI LANKA, SWITZERLAND, TUNISA, UKRAINE, UNITED KINGDOM, USA	<ol style="list-style-type: none"> <li>1) COVER LETTER</li> <li>2) CERTIFICATE OF TAX RESIDENCE (OR U.S. FORM 6166)</li> <li>3) DECLARATION OF BENEFICIAL OWNERSHIP</li> </ol>
<b>FAVORABLE– 10%</b>	<b>25%</b>	ARMENIA, AUSTRIA, BELARUS, BULGARIA, CHINA, ETHIOPIA, FRANCE, GEORGIA, INDIA, JORDAN, KAZAKHSTAN, SOUTH KOREA, MALAYSIA, MEXICO, MONGOLIA, MOROCCO, NETHERLANDS, NORTH KOREA, PANAMA, ROMANIA, RUSSIA, SERBIA AND MONTENEGRO, SWEDEN, SYRIA, THAILAND, TURKEY, UZBEKISTAN, VENEZUELA, VIETNAM	<ol style="list-style-type: none"> <li>1) COVER LETTER</li> <li>2) CERTIFICATE OF TAX RESIDENCE</li> <li>3) DECLARATION OF BENEFICIAL OWNERSHIP</li> </ol>
<b>FAVORABLE – 8%</b>	<b>27%</b>	AZERBAIJAN	<ol style="list-style-type: none"> <li>1) COVER LETTER</li> <li>2) CERTIFICATE OF TAX RESIDENCE</li> <li>3) DECLARATION OF BENEFICIAL OWNERSHIP</li> </ol>
<b>FAVORABLE– 5%</b>	<b>30%</b>	BAHRAIN, BOSNIA AND HERZEGOVINA, CROATIA, CYPRUS, HONG KONG, KUWAIT, LEBANON, MALTA, POLAND, SAUDI ARABIA, SINGAPORE, TAJIKISTAN, UNITED ARAB EMIRATES	<ol style="list-style-type: none"> <li>1) COVER LETTER</li> <li>2) CERTIFICATE OF TAX RESIDENCE</li> <li>3) DECLARATION OF BENEFICIAL OWNERSHIP</li> </ol>
<b>PERCENTAGE OF OWNERSHIP*</b>	<b>20-35%</b>	INVESTORS HOLDING MORE THAN 10%-25% OF THE OUTSTANDING SHARES OF THE ISSUING COMPANY.	<ol style="list-style-type: none"> <li>1) COVER LETTER</li> <li>2) CERTIFICATE OF TAX RESIDENCE</li> <li>3) DECLARATION OF BENEFICIAL OWNERSHIP</li> </ol>

\* PLEASE NOTE THAT A NUMBER OF TAX TREATIES PROVIDE FOR TWO OR MORE WITHHOLDING TAX RATES AVAILABLE DEPENDING ON CERTAIN PERCENTAGE OF HOLDING (10% - 25%) CONDITIONS SPECIFIED IN THE RESPECTIVE TREATIES. IT IS THE RESPONSIBILITY OF THE INVESTOR TO CONSULT WITH THEIR OWN TAX ADVISERS WITH RESPECT TO THE REQUIREMENTS FOR APPLICATION OF FAVOURABLE WITHHOLDING TAX RATE.

<b>DESCRIPTION OF VARIOUS DOCUMENTATION</b>			
<b>DOCUMENT NAME</b>	<b>DESCRIPTION</b>	<b>ORIGINAL / COPY</b>	<b>SIGNATURE REQUIREMENT</b>
<b>COVER LETTER</b> (APPENDIX A)	LISTING OF BENEFICIAL OWNERS CERTIFYING POSITION ON RECORD DATE.	ORIGINAL	FINANCIAL INSTITUTION
<b>CERTIFICATE OF RESIDENCY</b> (U.S. FORM 6166)	ISSUED BY THE BENEFICIAL OWNER'S LOCAL TAX OFFICE, STATING THE NAME OF THE TAX PAYER AND CERTIFYING THE YEAR OF THE DIVIDEND (2014).	ORIGINAL OR NOTARISED COPY	IRS / LOCAL TAX AUTHORITY, (AND NOTARY, IF APPLICABLE)
<b>DECLARATION OF BENEFICIAL OWNERSHIP</b> (APPENDIX B)	CERTIFIES THE BENEFICIAL OWNER AND THE AMOUNT OF SHARES HELD ON RECORD DATE.	ORIGINAL	BENEFICIAL OWNER (OR FINANCIAL INSTITUTION WITH VALID POA)

The information and data contained in this Notice is based on information obtained from multiple sources believed to be reliable. However, The Bank of New York Mellon 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.

## FREQUENTLY ASKED QUESTIONS (FAQs)

### GENERAL QUESTIONS

QUESTION	ANSWER
WHEN IS THE DEADLINE?	IN ORDER TO PARTICIPATE IN THE RELIEF AT SOURCE PROCESS DESCRIBED IN THE NOTICE, PAPERWORK MUST BE IN OUR OFFICES IN NEW YORK ON FRIDAY MAY 2 <sup>ND</sup> , 2014.
CAN OMNIBUS ACCOUNTS OBTAIN TAX RELIEF?	NO, ALL ACCOUNTS MUST BE DISCLOSED AT THE BENEFICIAL OWNER LEVEL.
WHO IS THE ULTIMATE BENEFICIAL HOLDER?	IT IS THE TRUE RECIPIENT OF THE INCOME. WHICH IS <u>NOT</u> THE FOLLOWING: AN AGENT, A NOMINEE, A SHELL OR PAPER-BASED COMPANY
IF THE BENEFICIAL OWNER IS AN EXEMPTED INSTITUTION SPECIFIC IN THE DOUBLE TAX TREATY AGREEMENT (DTTA), ARE THERE DOCUMENTATION REQUIREMENTS?	THE BENEFICIAL OWNER IS TO PROVIDE DOCUMENT THAT PROVES IT IS THE ORGANIZATION NOTED IN THE DTTA.
WHO DO I SEND THE RELIEF AT SOURCE DOCUMENTATION TO?	ALL ORIGINAL DOCUMENTS ARE DUE TO BNY MELLON / GLOBETAX 90 BROAD STREET, 16 <sup>TH</sup> FLOOR NEW YORK, NY 10004 USA ATTN: DEPOSITARY RECEIPTS – CZECH REPUBLIC
CAN I SIGN THE DECLARATION OF BENEFICIAL OWNERSHIP ON BEHALF OF MY CLIENT?	YES. HOWEVER IN ADDITION TO THE DECLARATION OF BENEFICIAL OWNERSHIP, YOU MUST PROVIDE A POWER OF ATTORNEY FROM THE BENEFICIAL OWNER, GIVING YOU AUTHORIZATION TO SIGN ON THEIR BEHALF.
IS THE PROCESS FOR TAX RELIEF OFFERED BY BNY MELLON AN OPTIONAL PROCESS?	YES, THIS IS A DISCRETIONARY, OPTIONAL SERVICE.
WILL GLOBETAX ACCEPT CLAIMS FILED DIRECTLY TO THEM BY BENEFICIAL OWNERS?	GLOBETAX ONLY ACCEPTS CLAIMS FILED BY THE DTC PARTICIPANT WHO WAS HOLDING THE SECURITIES THROUGH DTC AND ONLY TO THE EXTENT THAT DTC HAS REPORTED THESE HOLDINGS TO US AS VALID RECORD DATE HOLDINGS. BENEFICIAL OWNERS ARE REQUIRED TO FILE THEIR CLAIMS THROUGH THE CUSTODY CHAIN TO THE DTC PARTICIPANT OF RECORD. ALL CLAIMS NOT RECEIVED DIRECTLY FROM THE DTC PARTICIPANT WILL BE RETURNED TO THE BENEFICIAL OWNER.

### RELIEF AT SOURCE QUESTIONS

IS THERE A RELIEF AT SOURCE PROCESS FOR THIS EVENT?	YES.
DOES THE RELIEF AT SOURCE PROCESS HAVE A MINIMUM POSITION PER BENEFICIAL OWNER REQUIREMENT?	NO.
WILL I BE PAID THROUGH DTC FOR CLAIMS SUBMITTED THROUGH THE RELIEF AT SOURCE PROCESS?	YES.

## ADDITIONAL FAQs

### RELIEF AT SOURCE QUESTIONS (CONTINUED)

WHAT HAPPENS IF THE PARTICIPANT MAKES EXEMPT ELECTIONS THROUGH DTC BUT FAILS TO SUBMIT ALL REQUIRED DOCUMENTATION TO BNY MELLON / GLOBETAX?	ALL UNSUPPORTED SHARES WILL BE MOVED TO THE 65% UNFAVORABLE RATE. YOU WILL STILL BE ELIGIBLE TO CLAIM RELIEF THROUGH THE LONG FORM PROCESS BUT THE PAYMENT WILL BE DELAYED BY THE CZECH TAX AUTHORITIES BY A MINIMUM OF 1 YEAR.
IS THE RELIEF AT SOURCE PROCESS FREE OF CHARGE?	NO. THIS TAX RELIEF AT SOURCE ASSISTANCE SERVICE IS WHOLLY VOLUNTARY AND DISCRETIONARY AND OUTSIDE THE TERMS AND CONDITIONS OF ANY APPLICABLE DEPOSIT AGREEMENT. FEES WILL BE CHARGED FOR THIS SERVICE OF UP TO \$0.0075 PER DEPOSITARY SHARE WITH NO MINIMUM, AND ANY OTHER CHARGES, FEES OR EXPENSES PAYABLE BY OR DUE TO BNY MELLON OR ITS AGENTS, INCLUDING THE CUSTODIAN OR TO TAX AUTHORITIES OR REGULATORS. FEES PAID TO BNY MELLON MAY BE SHARED WITH ITS AGENTS.

### LONG FORM QUESTIONS

DOES THE LONG FORM PROCESS HAVE A MINIMUM POSITION REQUIREMENT PER BENEFICIAL OWNER?	NO, ALL CLAIMS WILL BE PROCESSED, THOUGH THERE IS A MINIMUM FEE OF \$25 PER AND A CUSTODIAL SERVICE FEE CZK 1500 (APPROXIMATELY USD \$75.50) BENEFICIAL OWNER ALL CLAIMS THAT DO NOT MEET THE MINIMUM FEES WILL NOT BE PROCESSED.
HOW DO I KNOW IF MY CLIENT QUALIFIES FOR AN EXEMPTION OR REDUCED TAX BASED ON PERCENTAGE OF OWNERSHIP?	THE INVESTOR WILL HAVE TO CONSULT WITH THEIR TAX ADVISOR TO DETERMINE ELIGIBILITY STATUS.
ONCE I SUBMIT A LONG FORM TAX REFUND CLAIM, HOW LONG WILL IT TAKE TO BE PAID?	IT SHOULD GENERALLY OCCUR WITHIN APPROXIMATELY 8 MONTHS.
WILL I BE PAID THROUGH DTC FOR CLAIMS SUBMITTED THROUGH THE LONG FORM TAX REFUND PROCESS?	NO, YOU WILL BE PAID BY CHECK.
IS THE LONG FORM PROCESS FREE OF CHARGE?	NO. THIS TAX RECLAIM ASSISTANCE SERVICE IS WHOLLY VOLUNTARY AND DISCRETIONARY AND OUTSIDE THE TERMS AND CONDITIONS OF ANY APPLICABLE DEPOSIT AGREEMENT. FEES WILL BE CHARGED FOR THIS ASSISTANCE SERVICE OF UP TO \$0.0075 PER DS 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 BNY MELLON OR ITS AGENTS, INCLUDING THE CUSTODIAN OR TAX AUTHORITIES. IN ADDITION, CHARGES MAY APPLY TO ANY LONG FORM CLAIMS REJECTED OR NOT ACCEPTED BY THE CUSTODIAN. FEES PAID TO BNY MELLON MAY BE SHARED WITH ITS AGENTS.
IS THE LONG FORM PROCESS FOR TAX RELIEF OFFERED BY BNY MELLON AN OPTIONAL PROCESS?	YES, THIS IS A DISCRETIONARY, OPTIONAL SERVICE.



## CONTACT DETAILS

PRIMARY CONTACT	JENNY LIN
DOMESTIC PHONE (U.S.)	1-800-915-3536
DOMESTIC FAX (U.S.)	1-800-985-3536
INTERNATIONAL PHONE	1-212-747-9100
INTERNATIONAL FAX	1-212-747-0029
EMAIL ADDRESS	<a href="mailto:JENNY_LIN@GLOBETAX.COM">JENNY_LIN@GLOBETAX.COM</a>
COMPANY	BNY MELLON in C/O GLOBETAX
STREET ADDRESS	90 BROAD STREET, 16 <sup>TH</sup> FLOOR
CITY/STATE/ZIP	NEW YORK, NY 10004
ADDITIONAL CONTACTS	KASEY HARBES / STEPHANIE URUGUTIA

***Warning and Disclaimer:***

BNY Mellon will not be responsible for the truth or accuracy of any submissions received by it and, by following the procedures set forth herein or otherwise submitting any information, all submitting holders of DSs, and their agents, shall be agreeing to indemnify and hold harmless BNY Mellon and its agents for any and all losses, liabilities, fees and expenses (including reasonable fees and expenses of counsel) incurred by any of them in connection therewith or arising there from. BNY Mellon and its agents will be relying upon the truth and accuracy of any and all submissions received by them in connection with the tax relief process and shall hold submitting holders of DSs and their agents, liable and responsible for any losses incurred in connection therewith or arising there from. There is no guarantee that the applicable tax authorities or the applicable issuer will accept submissions for relief. Neither BNY Mellon nor its agents shall be responsible or liable to any holders of DSs in connection with any matters related to, arising from, or in connection with the tax relief process described herein.

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.

**EXHIBIT A - COVER LETTER REQUIRED FOR CZECH TAX RECLAIM FILINGS**  
**THIS DOCUMENT MUST BE PREPARED ON THE DTC PARTICIPANT'S LETTERHEAD**

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**[DATE]**

GlobeTax as Agent for BNY Mellon  
90 Broad Street-16<sup>th</sup> Floor  
New York, NY 10004-2205  
Attn: Jenny Lin

Enclosed please find tax reclamation documents, which we are submitting on behalf of our clients who wish to reduce / avoid excess withholding tax on Czech DSs. We, [NAME OF DTC PARTICIPANT], also identified as DTC participant number [DTC PARTICIPANT NUMBER], hereby state that each beneficial owner cited below held the respective amount of shares on the record date of April 23, 2014 for the security Komerčni Banka – 144A (cusip: 500459102).

Below is the list of beneficial owners and their holdings, which total [TOTAL # OF DSs CITED BELOW] DSs. As required, the declaration of beneficial ownership and a certification of residency document (Form 6166, if applicable), are enclosed for each beneficial owner. The ratio is 3 Depository Shares to 1 Ordinary share. The information is as follows:

<u>Name of Beneficial Owner</u>	<u>Address</u>	<u>Taxpayer ID #</u>	<u># of DSs held</u>	<u>Reclaim Rate %</u>
1)				
2)				
3)etc.				

We ask that BNY Mellon, as Depository, apply to the Czech Tax Authorities for the reduced withholding tax rate on the above beneficial owners' behalf. Please contact the undersigned at [SIGNATORY'S TELEPHONE NUMBER] should you have any questions.

**Agreements, Representations and Indemnification**

We hereby agree that this tax reclaim assistance service is wholly voluntary and discretionary and outside the terms and conditions of any applicable deposit agreement. We hereby accept and agree to pay the fees of BNY Mellon of up to \$0.0075 per Depository Share for standard Relief at Source and Long Form tax reclaim (with a minimum of \$25.00), and any other charges, fees or expenses payable by or due to BNY Mellon or its agents, including the (respective) custodian, in connection with the tax reclaim process, or to tax authorities or regulators (which fees, charges or expenses may be deducted from the dividend or any other distribution or by billing or otherwise in BNY Mellon's discretion). We hereby agree that any such fees, charges or expenses may be due and payable whether or not a successful reduction in rate or reclamation is obtained. We hereby agree that fees paid to BNY Mellon may be shared with its Agents.

We hereby agree that in addition to statutory and documentation requirements and the deduction of fees, tax reclaim benefits will be subject to review and approval by the applicable custodian and the applicable tax regulators, and that BNY Mellon is not providing any legal, tax, accounting or other professional advice on these matters and has expressly disclaimed any liability whatsoever for any loss howsoever arising from or in reliance hereto.

We certify that to the best of our knowledge that each of the beneficial owners identified above are eligible for the preferential rates as stated herein and we declare that we have performed all the necessary due diligence to satisfy ourselves as to the accuracy of the information submitted to us by these beneficial owners.

We will be fully liable for any and all claims, penalties and / or interest, including without limitation, any foreign exchange fluctuations associated therewith. BNY Mellon shall not be liable for the failure to secure any refund. In consideration of the assistance of BNY Mellon and the custodian in processing such claims, we expressly agree that BNY Mellon and its agents or affiliates shall not have any liability for, and we shall indemnify, defend and hold each of BNY Mellon and its agents and affiliates harmless from and against, any and all loss, liability, damage, judgment, settlement, fine, penalty, demand, claim, cost or expense (including without limitation fees and expenses of defending itself or enforcing this agreement) arising out of or in connection herewith.

Sincerely,

[Signature of authorized signatory for DTC Participant]  
**[NAME AND TITLE OF AUTHORIZED OFFICER FOR DTC PARTICIPANT]**

**PAYMENT ADDRESS:** \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**EXHIBIT B - DECLARATION REQUIRED FOR CZECH TAX RECLAIM FILINGS**

**THIS DOCUMENT MUST BE PREPARED IN LOCAL SHARES (= DS / 3)**

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**Prohlášení skutečného vlastníka / Declaration of beneficial ownership**

Zahraniční osoba / společnost  
*Foreign Company / Individual*

\_\_\_\_\_

DIČ nebo datum narození  
*TIN (Tax Identification Number) or date of birth*

\_\_\_\_\_

Adresa v zemi residence  
*Address in the state of residency*

\_\_\_\_\_

*Cenný papír / Security*

\_\_\_\_\_ KOMERCNI BANKA – 144A

*Množství / Quantity*

\_\_\_\_\_

*Datum výplaty / Payment date*

\_\_\_\_\_ JUNE 02, 2014

Já, níže podepsaný, tímto prohlašuji, že výše uvedená osoba / společnost je skutečným vlastníkem příjmů, které plynou od Komerční banky, a.s., a že tento příjem je podle daňového práva státu její residence považován za její příjem.

*I hereby declare that the above mentioned company / individual is the beneficial owner of the income received from Komerční banka, a.s. and that the income is considered as an income of the above mentioned company / individual under the tax legislation of the state of residency of the company / individual.*

V případě, že by se výše uvedené skutečnosti změnily u kteréhokoliv v budoucnu obdrženého příjmu, zavazuji se o změnách neprodleně informovat Komerční banku, a.s.

*In case of any changes related to the beneficial owner of any future income received from Komerční banka, a.s. I will inform Komerční banka, a.s. without undue delay.*

V / In \_\_\_\_\_ datum / date \_\_\_\_\_

\_\_\_\_\_  
Podpis / Signature  
(pro společnost: oprávněná osoba)  
(for companies: authorized person)