

B #:	0827-14	
Date:	April 24, 2014	
То:	All Participants	
Category:	Dividends	
From:	International Services	
Attention:	Operations, Reorg & Dividend Managers, Partners & Cashiers	
Subject:	Tax Relief – Country: Belgium  Belgacom SA <u>CUSIP</u> : 077701100  Record Date: 04/21/2014 Payable Date: 05/12/2014	



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.



**BELGACOM** has announced a cash dividend (subject board to approval). BNY Mellon acts as Depositary for the company's American Depositary Share ("DS") program.

Using DTC's Elective Dividend System ("EDS") function over the Participant Terminal System ("PTS"), participants may certify all or a portion of their position entitled to the applicable withholding tax rates. Use of EDS will permit entitlement amounts to be paid through DTC.

On May 12, 2014, all holders will receive this dividend net of the full Belgian statutory withholding tax of 25% with the possibility to reclaim as outlined in the below Eligibility Matrix.

DIVIDEND EVER	NT DETAILS
COUNTRY OF ISSUANCE	BELGIUM
ISSUE	BELGACOM
CUSIP#	077701100
DEPOSITARY	BNY MELLON
DEPOSITARY SHARE RECORD DATE	APRIL 21, 2014
DEPOSITARY SHARE PAY DATE	MAY 12, 2014
DEPOSITARY SHARE GROSS DIVIDEND RATE ON PAY DATE	TBD
ORD GROSS DIVIDEND RATE ON PAY DATE	€ 1.68
RATIO	1 ORD : 5 DS
STATUTORY WHT RATE	25%

	(	CHARGES	S & DEADLI	NES	
FILING METHOD	ВАТСН	PAYMENT METHOD	DEPOSITARY SERVICE CHARGE	MINIMUM SERVICE CHARGE PER BENEFICIAL OWNER	FINAL SUBMISSION DEADLINE (8:00PM EST)
PRIMARY LONG FORM BATCH	PRIMARY LONG FORM BATCH	CHECK	\$0.0075 per DEPOSITARY SHARE ("DS")	\$25	JUNE 2, 2014
LONG FORM	POST PAY DATE, ONGOING	CHECK	\$0.0075 per DEPOSITARY SHARE ("DS")	\$25	OCTOBER 31, 2018

		ELIGIBILITY MATRIX	
RATE DESCRIPTION	RECLAIM	ELIGIBLE RESIDENTS	DOCUMENTATION REQUIRED
UNFAVORABLE – 25%	0%	NON-TREATY COUNTRIES	NONE
FAVORABLE – 20 % LONG FORM	5%	EGYPT, THAILAND, TURKEY	<ol> <li>ESP SUBMISSION</li> <li>COVER LETTER</li> <li>CERTIFIED FORM DIV 276</li> <li>POWER OF ATTORNEY</li> <li>CREDIT ADVICE / CERTIFICATION OF DIVIDEND PAYMENT</li> <li>AUTHORIZATION LETTER</li> </ol>
FAVORABLE – 15% LONG FORM	10%	U.S. INDIVIDUALS (IRAs & SEPS INCLUDED) U.S. CHARITIES U.S. CORPORATIONS U.S. OTHER ENTITIES S-CORP, PARTNERSHIP, TRUST OR ESTATE)	<ol> <li>ESP SUBMISSION</li> <li>COVER LETTER</li> <li>FORM DIV 276</li> <li>IRS FORM 6166</li> <li>POWER OF ATTORNEY</li> <li>CREDIT ADVICE / CERTIFICATION OF DIVIDEND PAYMENT</li> <li>AUTHORIZATION LETTER</li> </ol>
FAVORABLE – 15 % LONG FORM	10%	SEE APPENDIX A FOR LIST OF TREATY COUNTRIES	<ol> <li>ESP SUBMISSION</li> <li>COVER LETTER</li> <li>CERTIFIED FORM DIV 276</li> <li>POWER OF ATTORNEY</li> <li>CREDIT ADVICE / CERTIFICATION OF DIVIDEND PAYMENT</li> <li>AUTHORIZATION LETTER</li> </ol>
FAVORABLE – 5% LONG FORM	20%	CHINA	<ol> <li>ESP SUBMISSION</li> <li>COVER LETTER</li> <li>CERTIFIED FORM DIV 276</li> <li>POWER OF ATTORNEY</li> <li>CREDIT ADVICE / CERTIFICATION OF DIVIDEND PAYMENT</li> <li>AUTHORIZIATION LETTER</li> </ol>

ELIGIBILITY MATRIX (CONTINUED)			
RATE DESCRIPTION	RECLAIM RATE	ELIGIBLE RESIDENTS	DOCUMENTATION REQUIRED
FAVORABLE – 10 % LONG FORM	15%	BAHRAIN, BULGARIA, CHINA, CONGO, HUNGARY, KUWAIT, MACAO, MAURITIUS, MOLDOVA, MOROCCO, OMAN, QATAR, RUSSIA, TAIWAN, UNITED ARAB EMIRATES, UNITED KINGDOM	<ol> <li>ESP SUBMISSION</li> <li>COVER LETTER</li> <li>CERTIFIED FORM DIV 276</li> <li>POWER OF ATTORNEY</li> <li>CREDIT ADVICE / CERTIFICATION OF DIVIDEND PAYMENT</li> <li>AUTHORIZATION LETTER</li> </ol>
EXEMPT – 0% LONG FORM	25%	U.S. PENSIONS UNDER IRS SECTIONS 401(a), 501(a)	<ol> <li>ESP SUBMISSION</li> <li>COVER LETTER</li> <li>ANNEXE 26</li> <li>IRS FORM 6166</li> <li>POWER OF ATTORNEY</li> <li>CREDIT ADVICE / CERTIFICATION OF DIVIDEND PAYMENT</li> <li>AUTHORIZATION LETTER</li> </ol>
EXEMPT – 0% LONG FORM	25%	QUALIFYING NON-U.S. PENSIONS: CANADA, IRELAND, JAPAN AND UNITED KINGDOM	<ol> <li>ESP SUBMISSION</li> <li>COVER LETTER</li> <li>ANNEXE 26</li> <li>CERTIFICATE OF RESIDENCY</li> <li>POWER OF ATTORNEY</li> <li>CREDIT ADVICE / CERTIFICATION OF DIVIDEND PAYMENT</li> <li>AUTHORIZATION LETTER</li> </ol>

DES	CRIPTION OF VARIOUS DOCUM	ENTATION	
DOCUMENT NAME	DESCRIPTION	ORIGINAL/ COPY	SIGNATURE REQUIRE- MENTS
IRS FORM 6166	ISSUED BY THE INTERNAL REVENUE SERVICE, STATING THE NAME OF THE BENEFICIAL OWNER. THE TAX YEAR MUST BE THE SAME AS THE YEAR OF THE DIVIDEND PAYMENT.	ORIGINAL	IRS REPRESENTATIVE
COVER LETTER (EXHIBIT B)	COVER LETTER REQUIRED OF ALL CLAIMS WHICH ADVISES THE DEPOSITARY OF THE SALIENT DETAILS OF THE CLAIM.	ORIGINAL	DTC PARTICIPANT
DIV 276 FORM* (EXHIBIT F)	THIS IS THE BELGIAN TAX FORM USED FOR FILING PARTIAL REFUNDS.  * NOTE: STARTING 01/01/2014 THIS FORM MUST BE STAMPED (CERTIFIED) BY THE LOCAL TAX AUTHORITY—ONLY U.S. FORM 6166 MAY BE SUBMITTED AS A STAND-ALONE DOCUMENT.	ORIGINAL	DTC PARTICIPANT
ANNEXE 26 (EXHIBIT C)	THIS IS A CERTIFICATE OF EXEMPTION AND IS ONLY REQUIRED FOR THOSE SEEKING EXEMPTION FROM BELGIUM WITHHOLDING TAX.	ORIGINAL	DTC PARTICIPANT
POWER OF ATTORNEY	TWO POWER OF ATTORNEYS ARE REQUESTED IN ALL CASES WHERE A DTC PARTICIPANT IS SIGNING ON BEHALF OF THE BENEFICIAL OWNER ON THE DIV 276 FORM, OR THE ANNEXE 26. POAS ARE REQUIRED, ONE FROM THE BENEIFICIAL OWNER TO THE DTC PARTICIPANT AND ONE FROM THE DTC PARTICIPANT TO BNY MELLON / GLOBETAX.	COPY	BENEFICIAL OWNER AND DTC PARTICIPANT
CERTIFICATION OF DIVIDEND PAYMENT (EXHIBIT D)	PROVIDES A BREAKDOWN OF THE DIVIDEND PAYMENT. MUST BE SUBMITTED ON YOUR COMPANY'S LETTERHEAD.	ORIGINAL	DTC PARTICIPANT
AUTHORIZATION LETTER (EXHIBIT E)	ALLOWS DEPOSITARY BANK TO:  1. CREATE THE NECESSARY DOCUMENTATION (DIV 276 OR ANNEXE 26)  2. CREATE CREDIT ADVICE  3. SUBMIT APPLICATION ON BEHALF OF THE BENEFICIAL OWNER  4. RECEIVE THE REIMBURSEMENT AMOUNT	ORIGINAL	BENEFICIAL OWNER OR DTC PARTICIPANT (WITH ADDITIONAL POA FROM BENEFICIAL OWNER)

CONT	ACT DETAILS
PRIMARY CONTACT	KASEY HARBES
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	KASEY_HARBES@GLOBETAX.COM
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	JENNY LIN

## **ESP**



BNY Mellon, offers ESP powered by GlobeTax, to simplify the transmission of beneficial owner data. Required documentation, as outlined in this Important Notice, must be received by the Depositary before the claim can be considered valid.

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

https://esp.globetax.com

Please contact Ms. Kasey Harbes at 1-800-915-3536 if you have any questions about this process.

FREQUENTLY ASKED	QUESTIONS (FAQs)
QUESTION	ANSWER
ARE THERE ANY ADDITIONAL ELIGIBILITY REQUIREMENTS I SHOULD KNOW ABOUT?	YES. IF THE BENEFICIAL OWNER IS ENGAGED IN A TRADE OR BUSINESS IN BELGIUM THROUGH A PERMANENT ESTABLISHMENT IN BELGIUM THEY ARE INELIGIBLE TO CLAIM THROUGH THIS PROCESS.
DO I NEED TO PHYSICALLY SEND ANY DOCUMENTS TO BNY MELLON / GLOBETAX?	YES, ALONG WITH THE ELECTRONIC SUBMISSION WE NEED ALL REQUIRED DOCUMENTATION IN HARDCOPY FORM.
CAN I SIGN THE AUTHORIZATION ON BEHALF OF MY CLIENT?	YES. HOWEVER IN ADDITION TO THE AUTHORIZATION LETTER, 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 I BE PAID THROUGH DTC?	NO, YOU WILL BE PAID BY CHECK
HOW LONG DOES IT TAKE FOR CLAIMS TO BE PAID?	GENERALLY 1-2 YEARS.
IS THERE A MINIMUM POSITION PER BENEFICAL OWNER REQUIREMENT?	YES, CLAIMS MUST RECLAIM AT LEAST \$25.00
IS THIS 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 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.

#### **DISCLAIMER**

#### 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 (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 depositary 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 - FAVORABLE 15% LONG-FORM** 

COUNTRY	ENTRY INTO FORCE	DIVIDENDS	
		General	Reduced
ALBANIA	1/9/2004	15	5*
ALGERIA	10/1/2003	15	15
ARGENTINA	22/07/1999	15	10*
ARMENIA	1/10/2001	15	5*
AUSTRALIA	1/11/1979	15	15
AUSTRIA	28/06/1973	15	15
AZERBAIJAN	12/8/2004	15	5*/10**
BANGLADESH	9/12/1997	15	15
BELARUS	13/10/1998	15	5*
BOSNIA HERZAGOVINA (former YUGOSLAVIA)	26/05/1983	15	10*
BRAZIL	13/07/1973	15	15
CANADA	6/10/2004	15	5*
CHILE	5/5/2010	15	0*
COTE D'IVOIRE	30/12/1980	15	15
CROATIA	1/4/2004	15	5*
CYPRUS	8/12/1999	15	10*
CZECH REPUBLIC	24/07/2000	15	5*
DENMARK	31/12/1970	15	15
ECUADOR	18/03/2004	15	15
ESTONIA	15/04/2003	15	5*
FINLAND	27/12/1978	15	5*
France	17/06/1965	15	10*
GABON	13/05/2005	15	15
GEORGIA	4/5/2004	15	5*
GERMANY	30/07/1969	15	15
GHANA	17/10/2008	15	10*
GREECE	30/12/2005	15	5*
HONG KONG	7/10/2004	15	5*
ICELAND	19/06/2003	15	5*
INDIA	1/10/1997	15	15
INDONESIA	7/11/2001	15	10*
IRELAND	31/12/1973	15	15
ISRAEL	4/11/1975	15	15
ITALY	29/07/1989	15	15
JAPAN	16/04/1970	15	10*
KAZAKHSTAN	13/04/2000	15	5*
KYRGYZSTAN (former USSR)	8/1/1991	15	15
LATVIA	7/5/2003	15	5*
LITHUANIA	5/5/2003	15	5*
Luxembourg	30/12/1972	15	10*

**EXHIBIT A - FAVORABLE 15% LONG-FORM (CONTINUED)** 

COUNTRY	ENTRY INTO FORCE	DIVIDENDS	
		General	Reduced
MALAYSIA	14/08/1975	15	15
MALTA	3/1/1975	15	15
MEXICO	1/2/1997	15	5*
MOLDOVA (former USSR)	8/1/1991	15	15
MONGOLIA	30/03/2000	15	5*
NETHERLANDS	31/12/2002	15	5*
NEW ZEALAND	8/12/1983	15	15
NIGERIA	27/10/1994	15	12.5*
NORWAY	4/10/1991	15	5*
PAKISTAN	2/9/1983	15	15
PHILIPPINES	9/7/1980	15	10*
POLAND	29/04/2004	15	5*
Portugal	19/02/1971	15	15
ROMANIA	17/10/1998	15	5*
SAN MARINO	25/06/2007	15	0*/5**
SENEGAL	4/2/1993	15	15
SERBIA AND MONTENEGRO (former YUGOSLAVIA)	26/05/1983	15	10*
SINGAPORE	27/11/2008	15	5*
SLOVAKIA	13/06/2000	15	5*
SLOVENIA	2/10/2002	15	5*
SOUTH AFRICA	10/10/1998	15	5*
SOUTH KOREA	19/09/1979	15	15
SPAIN	25/06/2003	15	0*
SRI LANKA	12/6/1985	15	15
SWEDEN	24/02/1993	15	5*
SWITZERLAND	26/09/1980	15	10*
TAJIKISTAN (former USSR)	8/1/1991	15	15
TUNISIA	16/10/1976	15	15
TURKMENISTAN (former USSR)	8/1/1991	15	15
UKRAINE	25/02/1999	15	5*
UNITED STATES OF AMERICA	28/12/2007	15	5*
UZBEKISTAN	8/7/1999	15	5*
VENEZUELA	13/11/1998	15	5*
VIETNAM	25/06/1999	15	5*/10**

<sup>\* / \*\*</sup> In cases of multiple tax rates, the lower rate typically refers to a minimum of 10% (or 25%) of outstanding shares, please contact your tax advisor or GlobeTax for specific details.

## EXHIBIT B- COVER LETTER REQUIRED FOR BELGIAN TAX RECLAIM FILINGS THIS DOCUMENT MUST BE PREPARED ON THE DTC PARTICIPANT'S LETTERHEAD

[DATE]

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

Enclosed please find tax reclamation documents, which we are submitting on behalf of our clients who wish to avoid excess withholding tax on Belgian 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 21, 2014** for the security **BELGACOM (cusip: 077701100)**.

Below is the list of beneficial owners and their holdings, which total <u>TOTAL # OF DSs CITED BELOWIDSS</u>. As required, the forms and a certification of residency document (Form 6166) if applicable, are enclosed for each beneficial owner. The ratio is <u>5</u> Depositary Share to <u>1</u> Ordinary share. The information is as follows:

- of beneficial owner
- 1)
- 2)

3)etc.

We ask that BNY Mellon, as Depositary, apply to the Belgian 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 Depositary Share for Long Form tax reclaims (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 signature AND TITLE OF AUT	natory for DTC Participant]  THORIZED OFFICER FOR DTC PARTICIPANT]
PAYMENT ADDRESS:	

# EXHIBIT C- ANNEXE 26 REQUIRED FOR TAX EXEMPT BELGIAN TAX RECLAIM FILINGS

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#### **ANNEXE 26**

#### PRECOMPTE MOBILIER

perçu par voie de retenue sur certains revenus de capitaux mobiliers

#### **ATTESTATION**

Établie conformément à l'article 117, §2, de l'A.R. d'exécution C.I.R. 92 en ce qui concerne les revenus d'actions ou parts de capitaux investis alloués à certains épargnants non-résidents

son nor ficiaire	TANT: l'exonération n'est pas accordée lorsque l'épargnant non-résident, bien qu'il gère en m les actions ou parts ou les parts de capitaux investis, est tenu d'en verser le produit au bénéfinal en vertu d'une obligation contractuelle sauf si le bénéficiaire final est également un nont visé à l'article 106, § 2 de l'A.R./ C.I.R. 92.
	orénoms ou dénomination et adresse complètes du déposant titulaire à la du  (des) dépôt(s) nu-
certifie	:
1°	Qu'il n'a pas en Belgique:
	<ul><li>a) son domicile ou le siège de sa fortune;</li><li>b) son siège social, son principal établissement administratif, son siège de direction</li></ul>
2°	Qu'il est propriétaire ou usufruitier des actions ou parts déposées à découvert;
	Que son objet social consiste uniquement en la gestion et le placement de fonds récoltés but de servir des retraites légales ou complémentaires et qu'il se livre sans but lucratif exclusi- à des opérations visées à l'article 182, 2°, du C.I.R. 92 ;
4°	Qu'il est exempté de tout impôt sur les revenus dans le pays où il est résident.
	Qu' il s'engage à signaler immédiatement toute modification qui affecterait l'exactitude de la te attestation. de déclaration inexacte, le bénéficiaire final des revenus devient redevable du précompte moelge.
	Fait à, le
	Signatures*

\*La (les) signature(s) autorisée(s) doit (doivent) être suivie(s) de la qualité du (des) signataire(s).

# EXHIBIT D- CERTIFICATION OF DIVIDEND PAYMENT REQUIRED FOR BELGIAN TAX RECLAIM FILINGS THIS DOCUMENT MUST BE PREPARED ON THE DTC PARTICIPANT'S LETTERHEAD

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### CERTIFICATION OF DIVIDEND PAYMENT

CERTIFIC	CATION OF DIVIDEND FATMENT
We hereby confirm that: <beneficial name="" owner=""> <b address#1="" o=""> <b address#2="" o=""></b></b></beneficial>	
Was a recipient of a coupon, payable on	April 25, 2014 on a position of:
<ord amount="" share=""> shares of BELG with the gross dividend rate of</ord>	
the payment was distributed as follows:	
gross dividend less: 25% withholding tax Net dividend Amount to be refunded	EUR <gross dividend=""> EUR&lt;25% of Gross&gt; EUR&lt;75% of Gross&gt; EUR&lt;5% - 25% of Gross&gt;</gross>
Certified By Authorized Signature Name	Date

#### **EXHIBIT E- AUTHORIZATION LETTER**

## Authorization to Perform Tax Reclamation With Respect to Claims in Belgium ("Authorization")

The undersigned hereby makes, constitutes and appoints Globe Tax Services Incorporated ("GlobeTax"), a New York corporation having its principal place of business at 90 Broad Street, New York, NY 10004-2205, U.S.A. as its true and lawful attorney-in-fact and agent, to sign and file with applicable authorities any and all applications, requests, or claims for refund, reduction, repayment, and credit of, or exemption or relief from, any withholding or similar taxes on income on securities in the custody of the Custodian specified below from the Kingdom of Belgium and its various instrumentalities, including to obtain any documents from government agencies or other information required for that purpose, and to receive and distribute funds received in connection therewith, that are submitted to GlobeTax and/or the applicable depositary.

We have caused this Auth tive this day of	norization to be executed by our duly authorized representa-
For: Address: Country of Residence: Tax ID # (USA Only): Custodian (Participant): DTC#:	<pre><beneficial name="" owner=""> <beneficial address="" owner=""> <beneficial country="" of="" owner="" residence=""> <ssn# tin#=""> <dtc name="" participant=""> <dtc #="" participant=""></dtc></dtc></ssn#></beneficial></beneficial></beneficial></pre>
Signature: Name:	
Title:	

## **EXHIBIT F- DIV 276 TO FOLLOW THIS PAGE**

Service Public Fédéral FINANCES de BELGIQUE Administration des contributions

Federale Overheidsdienst FINANCIEN van BELGIE Administratie der directe

belastingen

Föderaler Öffentlicher Dienst FINANZEN von BELGIEN Verwaltung der direkten

Federal Public Service FINANCE of BELGIUM Direct-tax administration

directes Steuern Il est conseillé au requérant de consulter les notices explicatives 276 Div. (Not.) et de conserver une photocopie de sa demande. De aanvrager wordt aangeraden de verklarende nota's 276 Div. (Not.) te raadplegen en een afschrift van zijn aanvraag te bewaren Dem Antragsteller wird empfohlen, den Erläuterungsvordruck 276 Div. (Not.) zu Rate zu ziehen und eine Abschrift seines Antrags zu behalten. The claimant is advised to refer to the explanatory notes 276 Div. (Not.) and to keep a duplicate of his claim. 1 EXEMPLAIRE DESTINE A L'ADMINISTRATION BELGE - EXEMPLAAR VOOR DE BELGISCHE ADMINISTRATIE - AUSFERTIGUNG FUR DIE BELGISCHE VERWALTUNG - COPY FOR THE BELGIAN AUTHORITIES RECTO DEMANDE DE REDUCTION du précompte mobilier sur les dividendes d'origine belge en application de la convention de double imposition conclue entre la Belgique et AANVRAAG OM VERMINDERING van rocerende voorheffing op dividenden van Belgische oorsprong ingevolge het dubbelbelastingverdrag tussen Belgié en ANTRAG AUF ERMÄSSIGUNG des Mobiliemsteuervorabzugs auf Dividenden belgischen Ursprungs gemêen Doppelbesteuerungsabkommen zwischen Belgien und CLAIM FOR REDUCTION of the tax prepayment on personal property income on dividends from Belgian sources under the double taxation convention between Belgium and .....(1) DENOMINATION OU RAISON SOCIALE DU DEBITEUR BELGE DES DIVIDENDES : N° TVA (si connu) BTW Nr. (indien gekend) MWSt. Nr. (falls bekannt) BENAMING OF FIRMA VAN DE REI GISCHE SCHULDENAAR VAN DE DIVIDENDEN : BEZEICHNUNG ODER FIRMENNAME DES BELGISCHEN SCHULDNERS DER DIVIDENDEN: VAT Nr. (if known NAME OR FIRM OF THE BELGIAN DEBTOR OF THE DIVIDENDS: Adresse ou siège social - Adres of maatschappelijke zetel - Anschrift oder Sitz - Address or registered office : II. DECLARATION DU REQUERANT (2) - VERKLARING VAN DE AANVRAGER (2) - ERKLÄRUNG DES ANTRAGSTELLERS (2) - DECLARATION BY THE CLAIMANT (2) enheid - Währung - Currency unit : 1 99 1. Nom et prénoms ou dénomination complète du bénéficiaire effectif des dividendes Naam en voormamen of volledige benaming van de uiteindelijk gerechtigde tot de dividenden Name und Vornamen oder vollständige Bezeichnung des Nutzungsberechtigten der **Dividenden** Full name of the beneficial owner of the dividends Numéro d'identification fiscale dans l'état de résidence : Fiscaal identificatienummer in de woonstaat : Steuerliche Identifikationsnummer in dem Wohnsitzstaat : Fiscal identification number in the state of residence . 2. Forme juridique (3) - Rechtsvorm (3) - Rechtsform (3) - Legal Form (3) 3. Adresse (rue, n°) - Adres (straat, nr.) - Anschrift (Straße, Nr.) - Address (street, nr.) Commune, pays - Gemeente, land - Gemeinde, Land - City, country Code postal - Postcode - Postleitzahl - Postal code 4. Désignation des revenus - Omschriiving van de inkomsten - Bezeichnung der Einkünfte - Description of the income a. Nature et forme des actions (à spécifier) - Aard en vorm van de aandelen (te specifiëren) - Art oder Form der Aktien (zu spezifizieren) - Nature and form of the shares (to be specified) b. Date d'émission - Datum van uitgifte - Datum der Ausgabe - Date of issue (4) c. Date de mise en paiement - Datum van betaalbaarstelling - Fälligkeitstag - Payable date (4) \_\_\_\_\_\_13 d. Numéro du coupon - Nummer van de coupon - Nummer des Kupons - Coupon number e. Nombre de coupons - Aantal coupons - Anzahl der Kupons - Number of coupons f. Dividende net par coupon - Nettodividend per coupon - Nettodividende je Kupon - Net dividend per coupon (5) g. Dividende net total - Totaal nettodividend - Gesamtnettodividende - Total net dividend 5. Modalités de remboursement (6) - Wijze van terugbetaling (6) - Rückzahlungsanweisungen (6) - Procedure of the refund (6) a) L'excédent de précompte doit être versé en Belgique (7) / à fétranger (7)

De leveel geheven roerende voorheffing is terug te betalen in België (7) / in het buitenland (7) \_\_\_\_ 21 Der Erstatlungsbetrag des Mobiliensteuervorabzugs ist in Belgien (7) / ins Ausland (7) zu überweisen The excess tax prepayment on personal property income should be repaid in Belgium (7) / abroad (7) b) Au compte n° (8) - Op rekening nr. (8) - Auf das Konto-Nr. (8) - On account Nr. (8) ] 22 (8) BIC : c) Auprès de (9) - Bij de (9) - Bei (9) - With the (9) d) Ouvert au nom de - Op naam van - Geöffnet auf den Namen von - Opened in the name of e) Communication (10) - Mededeling (10) - Mitteilung (10) - Communication (10) 6. Procuration à mettre à la page 4 - Volmacht aan te brengen op blz. 4 - Vollmacht auf Seite 4 - Proxy on page 4 (10)

III. CADRE RESERVE A L'ADMINISTRATION BELGE - VAK BESTEMD VOOR DE BELGISCHE ADMINISTRATIE - DER BELGISCHEN VERWALTUNG VORBEHALTENER ABSCHNITT - PART FOR THE BELGIAN AUTHORITIES

L\_\_\_ 35

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1 | 1 | 1 | 1 |

9. TRANSF

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1 41

10. DP/n

11. DP/F

Suite, voir verso - Vervolg, zie ommezijde - Fortsetzung, siehe Rückseite - Continued overleaf

TITELT T.

1. DAT

3. Nom 1/TP2

2. VE1 - F/% - BS1/TR2

31 5. II.1 = II.5.d

32 6. II.3 = BEL

33 7. V/P

1	EXEMPLAIRE DESTINE A L'ADMINISTRATION BELGE - EXEMPLAAR VOOR DE BELGISCHE ADMINISTRATIE - AUSFERTIGUN	G FÜR DIE BELGISCHE VERWALTUNG - COPY FOR THE BELGIAN AU	JTHORITIES F	RECTO	P. 3
V.	CADRE A REMPLIR PAR LA SOCIETE DEBITRICE DES DIVIDENDES I IN TE VULLEN DOOR DE VENNOOTSCHAP DIE DE DIVIDENDEN UITK ABSCHNITT, DEN DIE AUSSCHÜTTENDE GESELLSCHAFT DER DIVIDENDEN AUSZUFÜ PART TO BE FILLED IN BY THE DISTRIBUTING COMPANY OF THE DIVI	EERT INGEVAL VAN VERMINDERING BIJ DE BRON ILLEN HAT, FALLS DIE STEUER AN DER QUELLE ERMÄSS	SIGT WIRD		
1.	Dividende net total (cadre II, ligne 4, g): Totaal nettodividend (vak, II, regel 4, g): Gesamtnettodividend (Abschnitt II, Zeile 4, g): Total net dividend (part II, line 4, g):		(a)		
2.	Réduction résultant de la convention : Vermindering ingevolge de overeenkomst : Ermäßigung nach dem Abkommen : Reduction under the convention :	(a) x(1) =	(b)	.,,	
Γ		]			
	Vérifié le     Le chef de service du bureau de recette,       Nagezien op     De dienstchef van het ontvangkantoor,	Date et signature du débiteur, Datum en handlekening van de schuldenaur, Datum und Unterschrift des Schuldners, Date and signature of the debtor,			

Geprüft am ...... Der Dienstleiter des Einnahmeamtes,

Procuration - Volmacht - Vollmacht - Proxy

Service Public Fédéral FINANCES de BELGIQUE Administration des contributions directes

Federale Overheidsdienst FINANCIEN van BELGIE Administratie der directe belastingen

Föderaler Öffentlicher Dienst FINANZEN von BELGIEN Verwaltung der direkten Steuern

Federal Public Service FINANCE of BELGIUM Direct-tax administration

Il est conseillé au requérant de consulter les notices explicatives 276 Div. (Not.) et de conserver une photocopie de sa demande.

	De aanvrager wordt aangeraden de verklarende nota's 276 Div. (Not.) te raadplegen en een aischnift van zijn aanvraag te bewaren.  Dem Antragsteller wird empfohlen, den Eriäuterungsvordruck 276 Div. (Not.) zu Rate zu ziehen und eine Abschrift seines Antrags zu behalten.  The claimant is advised to refer to the explanatory notes 276 Div. (Not.) and to keep a duplicate of his claim.	
2	EXEMPLAIRE DESTINE A L'ADMINISTRATION DE L'ETAT DE RESIDENCE - EXEMPLAAR VOOR DE WOONSTAAT - AUSFERTIGUNG FUR DIE VERWALTUNG DES WOHNSITZSTAATES - COPY FOR THE STAT.	E OF RESIDENCE RECTO
DE AA	EMANDE DE REDUCTION du précompte mobilier sur les dividendes d'origine belge en application de la convention de double imposition conclue entre la Belgique et ANVRAAG OM VERMINDERING van roerende voorheffing op dividenden van Belgische oorsprong ingevolge het dubbelbelastingverdrag tussen België en NTRAG AUF ERMÄSSIGUNG des Mobiliensteuervorabzugs auf Dividenden belgischen Ursprungs gemäß dem Doppelbesteuerungsabkommen zwischen Belgien und LAIM FOR REDUCTION of the tax prepayment on personal property income on dividends from Belgian sources under the double taxation convention between Belgium and 	4
I.	DENOMINATION OU RAISON SOCIALE DU DEBITEUR BELGE DES DIVIDENDES : BENAMING OF FIRMA VAN DE BELGISCHE SCHULDENAAR VAN DE DIVIDENDEN : BEZEICHNUNG ODER FIRMENNAME DES BELGISCHEN SCHULDNERS DER DIVIDENDEN : NAME OR FIRM OF THE BELGIAN DEBTOR OF THE DIVIDENDS :	N° TVA (si connu) BTW Nr. (indien gekend) MWSt. Nr. (falls bekannt) VAT Nr. (if known)
*****	Adresse ou siège social - Adres of maatschappelijke zetel - Anschrift oder Sitz - Address or registered office :	
II.	DECLARATION DU REQUERANT (2) - VERKLARING VAN DE AANVRAGER (2) - ERKLÄRUNG DES ANTRAGSTELLERS (2) - DECLARATION BY THE CLAIMANT (2) Devise - Munteenheid - Währung - Currency unit :	111
	1. Nom et prénoms ou dénomination complète du bénéficiaire effectif des dividendes  Naam en voornamen of volledige benaming van de uiteindelijk gerechtigde tot de dividenden  Name und Vornamen oder vollständige Bezeichnung des Nutzungsberechtigten der Dividenden	
L	Full name of the beneficial owner of the dividends	
	Numéro d'identification fiscale dans l'état de résidence : Fiscaal identification mer in de woonstaat : Steuerliche identifikationsnummer in dem Wohnsitzstaat : Fiscal identification number in the state of residence :	
	2. Forme juridique (3) - Rechtsvorm (3) - Rechtsform (3) - Legal Form (3) 3. Adresse (rue, n°) - Adres (straat, nr.) - Anschrift (Straße, Nr.) - Address (street, nr.)	
	Code postal - Postcode - Postleitzahl - Postal code Commune, pays - Gemeente, land - Gemeinde, Land - City, country	
	4. Désignation des revenus - Omschrijving van de inkomsten - Bezeichnung der Einkünfte - Description of the income	
	a. Nature et forme des actions (à spécifier) - Aard en vorm van de aandelen (te specifiëren) - Art oder Form der Aktien (zu spezifizieren) - Nature and form of the shares (to b	e specified)
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		e specified)
	b. Date d'émission - Datum van uitgifte - Datum der Ausgabe - Date of issue (4)	e specified)
	b. Date d'émission - Datum van uitgifte - Datum der Ausgabe - Date of issue (4)  c. Date de mise en paiement - Datum van betaalbaarstelling - Fälligkeitstag - Payable date (4)	e specified)
	b. Date d'émission - Datum van uitgifte - Datum der Ausgabe - Date of issue (4)  c. Date de mise en paiement - Datum van betaalbaarstelling - Fälligkeitstag - Payable date (4)  d. Numéro du coupon - Nummer van de coupon - Nummer des Kupons - Coupon number	e specified)
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Suite, voir verso - Vervolg, zie ommezijde - Fortsetzung, siehe Rückseite - Continued overleaf

<b>2</b> EXE	XEMPLAIRE DESTINE A L'ADMINISTRATION DE L'ETAT DE RESIDENCE - EXEMP	LAAR VOOR DE WOONSTAAT - AUSFERTIGUNG FUR DIE VERWALTUNG DES WOHNSITZSTAATES - COPY FOR THE STATE OF RESIDENCE VERSO P. 6
7.	Le soussigné certifie que le bénéficiaire effectif désigné au rectc De ondergetekende bevestigt dat de op de voorzijde vermelde t Der Unterzeichnete erklärt, dass der auf der Vorderseite bezeich The undersijned certifies that the beneficial owner mentioned o	oreunit les conditions suivantes : uiteindelijk gerechtigde de volgende voorwaarden vervult : nnete Nutzungsberechtigte die folgenden Bedingungen erfüllt :
	a) Conditions habituelles - Gewone voorwaarden - Gewö	
		au sens de la Convention en cause ;
		in de zin van de desbetreffende Overeenkomst ;
		ansässig;
		within the meaning of the Convention concerned;
	2° il n'avait pas en Belgique, à la date d'attribution ou de mis	se en paiement des dividendes mentionnés ci-dessus, d'établissement stable ou de base fixe auxquels se rattachaient effectivement les action
		e betaalbaarstelling van de hierboven vermelde dividenden geen vaste inrichting of vaste basis waarmee de aandelen uit hoofde waarvan d
	dividenden worden betaald, wezenlijk waren verbonden. er hatte am Zuteilungs- oder am Fälligkeitstag der höher	genannten angegebenen Dividenden, keine Betriebsstätte bzw. keine ständige Einrichtung in Belgien, zu der die Aktien, für die die Dividendei
	gezahlt werden, tatsächlich gehörten.	
	were paid, were effectively connected.	idends specified above were made payable, a permanent establishment or a fixed base with which the shares by virtue of which the dividend
	b) Conditions spécifiques éventuelles (cf. 276 Div. (Not.	) (B)) - Eventuele bijzondere voorwaarden (cf. 276 Div. (Not.) (B))
	Eventuelle Sonderbedingungen (cf. 276 Div. (Not.) (B)) -	
		ontant total de ces dividendes ou à concurrence de (en toutes lettres)
		er zake van het totaal bedrag van die dividenden of ter zake van een bedrag van (voluit)
		mtbetrages dieser Dividenden oder in Höhe von (in Buchstaben)
		full amount of such dividends or to the extent of (write out in full)
		, , , , , , , , , , , , , , , , , , ,
	à savoir le montant des dividendes transférés ou pe	
	zijnde het bedrag van de dividenden dat naar die St	
	A D SALE MAS S NO CONTROL COST BEING STREET STREET SEPARATION OF SEPARATION SERVICES	sen Staat überwiesen oder dort empfangen wurden, steuerpflichtig;
	i.e. on the amount of the dividends remitted to or red	
	2° il est exonéré d'impôt en	
		vrijgesteld van belasting ;
	für diese Dividenden ist er in	
	he is exempted from tax in	
		actions ou s'élevant à;
		aandelen of ter waarde van;
	er besitzt eine Beteiligung von	Aktien bzw. in Höhe von;
	he owns a holding of	shares or amounting to;
	4° il réunit les autres conditions spécifiques éventueller	nent prévues par la Convention en cause, notamment quant à sa personne.
	hij vervult de eventuele andere bijzondere bij de des	betreffende Overeenkomst gestelde voorwaarden, onder meer met betrekking tot zijn persoonlijke status.
	er erfüllt die andere Sonderbedingungen die ggf. im	Abkommen vorgesehen sind, besonders jene die seine Person betreffen.
	he fulfils the other particular conditions possibly prov	rided by the concerned Convention, especially as regards his status.
8.	. Nom, qualité et adresse du représentant dûment mandaté qui si	gne éventuellement la présente demande :
	Naam, hoedanigheid en adres van de gevolmachtigde vertegen	woordiger ingeval hij deze aanvraag ondertekent :
	Name, Eigenschaft und Anschrift des ordnungsgemäß bevollmä	chtigten Vertreters, der diesen Antrag ggf. unterzeichnet :
	Name, capacity and address of the duly authorised representati	ve eventually signing this claim :
	Date et signature du bénéficiaire effectif (7) ou de son représent	nnt /7\:
	Datum en handtekening van de uiteindelijk gerechtigde (7) of va	
	Datum und Unterschrift des Nutzungsberechtigten (7) oder dess	
	Date and signature of the beneficial owner (7) or his represents	
Do	ocuments annexés (nombre et nature) (11) - Bijgevoegde stukken (	aantal en aard) (11) - Beigefügte Unterlagen (Anzahl und Art) (11) - Documents attached (number and nature) (11)
IV.	ATTESTA	TION DES AUTORITES FISCALES DE L'ETAT DE RESIDENCE DU BENEFICIAIRE
	BEVESTIGING	G VAN DE BELASTINGAUTORITEITEN VAN DE WOONSTAAT VAN DE GENIETER
		GUNG DER STEUERBEHÖRDEN DES WOHNSITZSTAATES DES EMPFÄNGERS THE TAX AUTHORITIES OF THE STATE OF RESIDENCE OF THE BENEFICIAL OWNER
Le s	soussigné - De ondergetekende - Der Unterzeichnete - The u	ndersigned certifie que : - bevestigt dat erklärt dass : - certifies
	les mentions portées par le requérant dans la présente demande :	sont, à sa connaissance, exactes ;
	de in deze aanvraag voorkomende verklaringen van de aanvrager	
	die Angaben des Antragstellers in diesem Antrag, soweit ihm bek that the particulars given by the claimant in this claim are correct t	
2° i	le bénéficiaire effectif des dividendes mentionnés dans la présente	a demande - de ulleindelijk gerechtigde tot de in deze aanvraag vermelde dividenden :
	der Nutzungsberechtigte der in diesem Antrag aufgeführten Divide	enden - that the beneficial owner of the dividends mentioned in this claim :
		lentificatienummer in de woonstaat - Steuerliche Identifikationsnummer in dem Wohnsitzstaat -
,	Fiscal identification number in the state of residence :	
	- est un résident de	au sens de l'article de la convention conclue par la Belgique avec cet Etat ;
		m de zin van artikei
		gemass Artikel
		within the meaning of Article
		voor het belastingjaar eindigend opheeft overgelegd. agungsjahr eine Erklärung zur Einkommensteuer ineingereicht hat.
	isi uas ani apgeschiossene verani	againgapan vino Entiarang zar Entionariototot in
	has filed a	income tax return for the taxable year ending