



Important Notice
The Depository Trust Company

B #:	1269-14
Date:	July 3, 2014
To:	All Participants
Category:	Dividends
From:	International Services
Attention:	Operations, Reorg & Dividend Managers, Partners & Cashiers
Subject:	Tax Relief – Country: Finland <u>Depository</u> – Deutsche Bank Trust Company Americas Finland: Market Notice - New Finnish Tax Reclaim Forms

DTCC has received the following notice from Globe Tax Services Inc. for further questions, please contact Max Ramos or April Richland of Deutsche Bank Trust Company Americas / GlobeTax at 1-800-876-0959 (or via email at Finnish_Reclaims@GlobeTax.com).

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Non-Confidential

MARKET NOTICE: NEW FINNISH TAX RECLAIM FORMS

The Finnish Tax Administration has published new tax reclaim forms. ***Effective immediately, the VEROH Form 6203 has been replaced by the VEROH Forms 6163e and 6164e for the purpose of reclaiming dividend withholding tax.*** The VEROH 6164e must be used for individuals seeking a reclaim and the VEROH 6163e must be used for all other applicants (i.e. “non-individuals”). Templates and instructions for the new claim forms can be found as appendices to this document.

The following are some of the new changes and requirements:

VEROH 6163e – For Non-Individual Applicants, e.g. a Corporate Entity

- 'L' code (Applicant's reg. no. in Finland) from previous refund decision
- specified details of the applicants legal entity form
- confirmation of accounting period of the claimant at the time of dividend payment for calculation of interest on refunds
- specified details for income paid through a fund and partnership
- Certificate of Tax residency needs to be included as a separate document

VEROH 6164e – For Individual Applicants

- 'L' code (Applicant's reg. no. in Finland) from previous refund decision
- specified details of the applicants legal entity form
- confirmation of residency for all applicants (across countries), as well as special confirmation of domicile for Ireland and United Kingdom residents

Please contact Max Ramos or April Richland of Deutsche Bank Trust Company Americas / GlobeTax at 1-800-876-0959 (or via email at Finnish_Reclaims@GlobeTax.com) with further questions.

The information contained in this notice is for information purposes only and may be subject to change. We endeavor to provide up-to-date information on local requirements as new information becomes available. All final rules and requirements will be outlined in each applicable DTC Important Notice and will take precedence over this general market notice.

IRS Circular 230 Disclosure: Deutsche Bank Trust Company Americas, its affiliates, and its employees are not in the business of providing tax or legal advice to any taxpayer. This notice and any attachments are not intended or written to be used, and cannot be used or relied upon, by any such taxpayer for the purpose of avoiding tax penalties. Any such taxpayer should seek advice based on the taxpayer's particular circumstances from an independent tax advisor.

APPLICATION FOR REFUND OF FINNISH WITHHOLDING TAX ON DIVIDENDS

(Non-individual applicant, e.g. a corporate entity)

Refunds can be requested after the calendar year of payment.

1 APPLICANT

1.1 Applicant's official name (beneficial owner)			
1.2 Applicant is stock-exchange listed <input type="checkbox"/> yes <input type="checkbox"/> no		1.3 ISIN-code	
1.4 Postal address		1.5 Postal code	1.6 Post office
1.7 Telephone number		1.8 e-mail	
1.9 Country of residence	1.10 Tax id. no. in that country	1.11 Business id. no. in that country	1.12 Finnish Business ID
1.13 The applicant is <input type="checkbox"/> 1 Corporate entity <input type="checkbox"/> 2 State, Municipality or other Public entity <input type="checkbox"/> 3 Association <input type="checkbox"/> 4 Pension Institution or Fund <input type="checkbox"/> 5 Charity <input type="checkbox"/> 6 UCITS Collective investment scheme (fund) <input type="checkbox"/> 7 Non-UCITS fund <input type="checkbox"/> 8 Trust <input type="checkbox"/> 9 Estate <input type="checkbox"/> 10 Other			
1.14 Please describe the applicant's legal entity form			
1.15 Has the applicant asked for a refund earlier? <input type="checkbox"/> yes <input type="checkbox"/> no		1.16 Enter the 'L' code (Applicant's reg. no. in Finland) from applicant's previous refund decision	

2 Information on the agent signing this application form (Enclose letter of authorisation)

2.1 Representative's name	2.2 e-mail
2.3 Address	2.4 Telephone number

3 INFORMATION ON DIVIDENDS

If the application concerns more than one payment of dividends, please enclose separate spreadsheets with the facts in section 3.

3.1 Accounting period20 -20			
3.2 Receipt of dividends is due <input type="checkbox"/> on the applicant's direct shareholding <input type="checkbox"/> through a fund <input type="checkbox"/> through a partnership		3.3 Official name of fund or partnership	
3.4 TIN of fund or partnership (if available)	3.5 Business ID of fund or partnership (if available)	3.6 Country of tax residence of fund or partnership	
3.7 Beneficiary is a company, and the shares are its investment assets <input type="checkbox"/> yes <input type="checkbox"/> no		3.8 The beneficiary is a company referred to in Parent-Subsidiary Directive, and holds at least 10% of the capital of the distributing company <input type="checkbox"/> yes <input type="checkbox"/> no	
3.9 Name of payer		3.10 Payer is stock-exchange listed <input type="checkbox"/> yes <input type="checkbox"/> no	3.11 Date of payment
3.12 Number of shares	3.13 Gross amount of dividends €	3.14 Amount of tax withheld €	3.15 Amount requested as refund €

4 BANK ACCOUNT NUMBER FOR THE REFUND

4.1 IBAN account number (or other int'l format)	4.2 BIC or SWIFT code	4.3 Name of account holder
4.4 Name of bank	4.5 Address of bank	

The undersigned - declares that the dividend income is not effectively connected with the applicant's permanent establishment in Finland. - assures that the applicant has not received or requested any refund from the Finnish payer of dividend income concerning this dividend income.		
Date	Signature	Name in printed letters
Details of the right to sign for the applicant <input type="checkbox"/> By letter of authorisation <input type="checkbox"/> By proper right to sign for the applicant (see instructions)		Position or job title

Mandatory enclosures:

- certificate of tax residency issued by local authorities
- agent's letter of authorisation
- receipt on dividend income and withheld tax on source.

APPLICATION FOR REFUND OF FINNISH WITHHOLDING TAX ON DIVIDENDS (Non-individual applicant, e.g. a corporate entity)

INSTRUCTIONS

This form is for applicants who are not natural persons (including corporate entities, funds, other legal persons), and who are treated as beneficial owners of dividends for tax purposes.

When the year of payment of the dividends has not yet ended, the only party capable of refunding or correcting the withheld tax at source is the payer of the dividends. To obtain refund this way, the applicant must give adequate details to the payer. If the payer has made no refund correction, the applicant may complete this application form in order to ask the Tax Administration for a refund, on the condition that the year of payment of the dividends has ended.

Enclose the mandatory documentation as instructed on this form. If necessary, the Tax Administration may ask you to present the entire chain of financial records in order to establish audit trail, if there were several custodians or depositaries that transferred the dividends to the beneficiary.

If the applicant's country of residence is in the European Economic Area, and claims refund by virtue of being comparable with a tax-exempted Finnish entity, the following additional enclosures are required:

- A specific enclosure listing the reasons for the applicant's comparability with a tax-exempted Finnish entity that has similar operations as the applicant.
- Either Form 6161e - Certificate of tax treatment concerning dividends from Finland, or a document issued by the tax authorities of the country of residence, establishing that they are unable to give the applicant a full credit for the tax at source withheld in Finland.

If too much tax has been withheld at source, you may ask for a refund during the five calendar years that follow the year of payment and withholding. If excess withholding only amounts to €5 or less, we will not pay a refund. The euro is the currency we use for the preparation of your refund decision.

For more information on the taxation of nonresidents' income, visit tax.fi > Further resources > International situations > Tax rates on dividends and other payments to nonresidents.

Send completed form to:

Uusimaa Corporate Tax Office
PO Box 30
FI-00052 VERO
FINLAND

Detailed instructions

Line 1.1

Normally only the beneficial owner may be the applicant. If the applicant is another party, you must enclose an explanation with the reasons that justify payment of the refund to the applicant, not to the beneficial owner.

Lines 1.13 to 1.14

Tick the appropriate box. Add a more precise description of the applicant's legal entity form as necessary.

Example 1: The applicant is a limited-liability company. Under section 1.13, tick 1 (Corporate entity), and enter "Limited-liability company" in 1.14 as an additional description.

Example 2: The applicant is an investment fund. Tick either the 6 (UCITS) box or the 7 (non-UCITS) box, and enter an additional description, such as "Investment company with variable capital", in 1.14.

Section 3 of the form

If the application concerns more than one payment of dividends, enclose a specification with the details required in section 3 (line 3.1 to line 3.15) separately for each one of them.

Line 3.1

Enter the applicant's accounting period that relates to the distribution of the dividends.

Line 3.2

Tick "Receipt of dividends is due on the applicant's direct shareholding" if it is appropriate. Move on to line 3.7. If the dividends were paid through an investment fund or a partnership, tick the box as appropriate and give the necessary details on lines 3.3 to 3.6. If any changes have been made to the name of the fund or partnership, please give the old and the current names.

Line 3.7

'Investment assets' means the securities obtained by a financial institution, an insurance company, a pension institution for the purpose of investment (as provided in § 11, Business Tax Act).

Right to sign for the applicant

If the applicant has given the agent permission to sign the completed form, tick the "Letter of authorisation" box, and enclose the letter of authorisation.

If the party filing this form may sign for the applicant as it is entered in the Trade Register, tick "Proper right to sign for the applicant".

**APPLICATION FOR REFUND OF FINNISH WITHHOLDING
TAX ON DIVIDENDS
(Individual applicant)**

Refunds can be requested after the calendar year of payment.

1 APPLICANT

1.1 Family name		1.2 Given names		
1.3 Finnish personal identity code or date of birth (ddmmyyyy)				
1.4 Postal address		1.5 Postal code	1.6 Post office	
1.7 Country of residence		1.8 Tax id. no. in country of residence		1.9 Telephone number
1.10 Have you asked for a refund earlier? <input type="checkbox"/> yes <input type="checkbox"/> no		1.11 Enter the 'L' code (Applicant's reg. no. in Finland) from your previous refund decision		

2 Information on the agent signing this application form (Enclose letter of authorisation)

2.1 Representative's name		2.2 e-mail	
2.3 Address		2.4 Telephone number	

3 INFORMATION ON DIVIDENDS

If the application concerns more than one payment of dividends, please enclose separate spreadsheets with the facts in section 3.

<input type="checkbox"/> 3.1 Receipt of dividends is due on the applicant's direct shareholding.							
3.2 Dividends are being paid <input type="checkbox"/> through a fund <input type="checkbox"/> through a partnership		3.3 Official name of fund or partnership					
3.4 TIN of fund or partnership (if available)		3.5 Business ID of fund or partnership (if available)		3.6 Country of tax residence of fund or partnership			
3.7 Name of payer		3.8 Payer is stock-exchange listed <input type="checkbox"/> yes <input type="checkbox"/> no		3.9 Date of payment			
3.10 Number of shares		3.11 Gross amount of dividends €		3.12 Amount of tax withheld €		3.13 Amount requested as refund €	

4 BANK ACCOUNT NUMBER FOR THE REFUND

4.1 IBAN acc. number (or other int'l format)		4.2 BIC or SWIFT code		4.3 Name of account holder	
4.4 Name of bank		4.5 Address of bank			

The undersigned

- declares that the dividend income is not effectively connected with permanent establishment in Finland.
- assures that he/she has not received or requested any refund from the Finnish payer concerning this dividend income.

Date	Signature	Name in printed letters
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Mandatory enclosures:

- certificate of tax residency issued by local authorities on this form or a separate attachment
- agent's letter of authorisation.

VEROH 6164e 5.2014

CERTIFICATE OF FISCAL RESIDENCE

We hereby confirm that the applicant, within the meaning of the Double Taxation Convention, was resident in the country mentioned above - as well as domiciled, if country of residence is Ireland or United Kingdom - on the date when the income was paid.

Date	Signature and stamp of the tax authorities
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**APPLICATION FOR REFUND OF FINNISH WITHHOLDING TAX ON DIVIDENDS
(Individual applicant)**

INSTRUCTIONS

Please fill in the fields that concern you and show the form to the tax authorities of your country. Ask them to complete the "Certificate of Fiscal Residence" section. This means that they give an affirmation that you have been a tax resident of that country at the time when you received the dividends (concerned by the refund request). Instead of completing the "Certificate of Fiscal Residence" section on this form, your tax authority may give you another type of certificate that establishes your status of residence at the time.

During the calendar year when the dividends were paid the payer is the only party who can pay you a refund (in other words, adjust the withheld amount). To claim this adjustment, you must give the payer the necessary details. If the payer has not paid you a refund i.e. adjusted the withheld amount, you may use this form to request it from us **after the calendar year of payment has ended**.

Enclose a voucher that shows the payment of dividends and what was withheld on them. Ask the payer to give you such a voucher if you do not have one. The Tax Administration may require you to show all the vouchers and documentation, in order to establish the entire audit trail, if you received the dividends through an account operator or asset management

If you are a resident of an EEA country, you are entitled to request the refund in case the Finnish tax withheld at source cannot be fully credited in your country. Include an adequate explanation of the reasons why you are entitled to the refund, and enclose Form 6161e (Certificate of tax treatment concerning dividends) or other documentation that establishes how the dividends had been taxed in your country.

If too much tax has been withheld at source, you may ask for a refund during the five calendar years that follow the year of payment and withholding. If excess withholding only amounts to €5 per year or less, we will not pay a refund. The euro is the currency we use for the preparation of your refund decision.

If you have authorised someone to request the refund on your behalf, they must enclose a letter of authorisation.

For more information on the taxation of nonresidents' income, visit [tax.fi > Further resources > International situations > Tax rates on dividends and other payments to nonresidents](#).

Send completed form to:
Helsinki Area Tax Office
PO Box 400
FI-00052 VERO
FINLAND