



<b>B #:</b>	1271-14
<b>Date:</b>	08/25/2014
<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>MARKET NOTICE CONCERNING CHANGES TO THE SWISS DEPOSITARY RECEIPT LONG FORM TAX RECLAIM PROCESS AND FEES FOR U.S. RESIDENTS:</b> Tax Country: Switzerland Swisscom CUSIP: 871013108 Syngenta CUSIP: 87160A100

**MARKET NOTICE**

The Depository Trust Company has received from GlobeTax Services, the attached information regarding changes to the Swiss Depository Receipt Long Form Tax Reclaim process and fees for U.S. Residents.

For more information please contact GlobeTax Services at 212-747-9100.

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## **MARKET NOTICE CONCERNING CHANGES TO THE SWISS DEPOSITARY RECEIPT LONG FORM TAX RECLAIM PROCESS AND FEES FOR U.S. RESIDENTS:**

The dividend issues impacted by this change:

**Issue Name CUSIP:**

<b>Swisscom</b>	<b>871013108</b>
<b>Syngenta</b>	<b>87160A100</b>

Effective immediately, in order to receive a long form tax reclaim under the terms of the Double Taxation Treaty (“DTT”) between the United States and Switzerland, **DTC Participants must disclose all U.S. Beneficial Owners’ pertinent data with their long form claim (name, address, U.S. tax Identification number), regardless of the Beneficiary type. All claims must also be accompanied by a cover letter with the following verbiage;** “We hereby certify that we have the appropriate authorization (based on Powers of Attorney or the custodial/trust agreement) to claim on behalf of the beneficial owner listed above and these beneficial owners will not file a duplicate claim on these shares directly to the Swiss Federal Tax Administration.” The cover letter must be signed and printed on the DTC Participant’s letterhead.

**Additionally, submission of a copy of an Internal Revenue Service proof of residency form 6166 (dated within 3 years of dividend payment) is now compulsory for the following:**

1. US Corporations - if the gross dividend received was 100,000 CHF or greater
2. US Other Entities: if the gross dividend received was 100,000 CHF or greater
3. US Transparent Entities: if the gross dividend received was 25,000 CHF or greater
4. US RICs: if the gross dividend received was 100,000 CHF or greater
5. Swiss Tax Exempt US Pensions : All

**All claims submitted using a Missed EDS/EDS Revision Form will be rejected as lacking proper documentation for long form processing by the Swiss Tax Authority.**

**These stipulations apply retroactively to U.S. long form claims on all dividends still open for tax reclaim within the Swiss statute of limitations of 3 years from record date year’s end. This information therefore supersedes the outline of the U.S. long form process indicated in DTC Important Notices published prior to 2014.**

**A minimum tax reclaim fee of \$25.00 per U.S. Beneficial Owner claim applies to all long form claims on dividends that paid since 2011. This change in the fee supersedes the fees published on the individual Important Notices and reflects the additional work required to comply with the new process.**

**Please contact Gina Giannou, April Richland, or Brett Lewis of BNY Mellon / GlobeTax at 1-800-915-3536 with further questions.**

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