

B#:	2257-15
Date:	December 21, 2015
То:	All Participants
Category:	Dividends
From:	International Services
Attention:	Operations, Reorg & Dividend Managers, Partners & Cashiers
Subject:	Tax Relief – Country: Korea Samsung Electronics Co. LTD (V) CUSIP: 796050888  Record Date: 12/31/2015 Payable Date: TBA  CA WEB Cut-Off: 1/22/2016 8:00 P.M.

Participants can use DTC's Corporate Actions Web (CA Web) service to certify all or a portion of their position entitled to the applicable withholding tax rate. Participants are urged to consult TaxInfo respectively before certifying their instructions over the CA Web.

Important: Prior to certifying tax withholding instructions, participants are urged to read, understand and comply with the information in the Legal Conditions category found on TaxInfo on the CA Web.

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 Pthis 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.



#### SAMSUNG ELECTRONICS CO LTD (V)

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

Participants can use DTC's Corporate Actions Web ("CA Web") instructions tab to certify all or a portion of their position entitled to the applicable withholding tax rate. Use of these instruction methods will permit entitlement amounts to be paid through DTC. By electing, Participants agree to the Agreements, Fees, Representations and Indemnification below.

On DR pay date, all eligible holders will have the opportunity to receive accurate entitlement as outlined in the "Eligibility Matrix". All holders not eligible for CA Web or not certified at a reduced withholding tax rate through CA Web 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	EVENT DETAILS
COUNTRY OF ISSUANCE	KOREA, REPUBLIC OF
ISSUE	SAMSUNG ELECTRONICS CO LTD (V)
CUSIP#	796050888
DEPOSITARY	CITIBANK, N.A.
DR RECORD DATE	12/31/2015
DR PAY DATE	ТВА
DR 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	PAYMENT METHOD	DEPOSITARY SERVICE CHARGE	MINIMUM SERVICE CHARGE PER BENEFICIAL OWNER	FINAL SUBMISSION DEADLINE (CA WEB & DOCUMENTATION)			
RELIEF AT SOURCE	PAYMENT ON PAY DATE	VIA DTC	UP TO \$0.005 PER ADR	USD \$0.00	1/22/2016; 8:00 P.M. EST			
STANDARD LONG FORM	POST PAY DATE ; ONGOING	VIA CHECK	UP TO \$0.0075 PER ADR	MINIMUM USD \$25.00 TAX RELIEF FEE AND UP TO KRW 50,000 CUSTODIAL FEE *ADDITIONAL WIRE FEES MAY APPLY	12/30/2018			

ELIGIBILITY MATRIX								
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 DOCUMENTATION REQUIREMENTS							
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)	INVESTMENT 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)	REPORT OF 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
WORLD EXEMPT ENTITIES	GOVERNMENT AND/OR INTERNATIONAL ORGANIZATION DEEMED WORLD TAX EXEMPT	,	SUPPORTING DOCUMENTS TO PROVE WORLD EXEMPT STATUS OR CERTIFICATE OF RESIDENCY FORM 29-2 (1)	REMAIN VALID FOR UP TO THREE	WORLD EXEMPT ENTITY
ENTITY TYPES NOT LISTED IN THIS MATRIX	N/A	NO	NE	N/A	N/A

CONTACT DETAILS						
PRIMARY CONTACT	WONJAE LEE					
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	KoreaESP@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	JOE HANDS					

#### **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 WONJAE LEE 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 CERTIFICATES 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 & FORM 29-2 (1) 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 PRECEDE 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 CITI 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 CITI 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: CITIBANK, N.A. / GLOBETAX DATE: 90 BROAD STREET, 16<sup>TH</sup> FLOOR NEW YORK, NY 10004-2205 ATTN: KOREA, REPUBLIC OF RE: WITHHOLDING CERTIFICATION FOR SAMSUNG ELECTRONICS CO LTD (V); CUSIP # 796050888 I / WE THE UNDERSIGNED \_\_\_\_\_\_ AUTHORIZED REPRESENTATIVE OF (CONTACT NAME) (DTCC PARTICIPANT NAME) HOLDING ADR(S) AT \_\_\_ OF SAMSUNG ELECTRONICS CO LTD (V); CUSIP # 796050888 (DTCC PTS NUMBER) REQUEST THAT THE UPCOMING CASH DIVIDEND PAYABLE TO HOLDERS AS OF 12/31/2015 BE PAID AT THE PREFERRED RATE(S) INDICATED BELOW OR AS PROVIDED ON THE ATTACHED SHAREHOLDERS LISTING. **ENTITY TYPE** COMPLETE (INDIVIDUAL. NAME OF ADDRESS COUNTRY NON-BENEFICIAL DR(S) TAX (STREET / CITY / OF **PERSONAL** INDIVIDUAL OR **RESIDENCE HOLDER** STATE / ZIP) **HELD RATE** ID # (TIN#) UNDISCLOSED) **TOTAL DR(S) HELD:** PLEASE ACCOUNT FOR ALL SHARES INCLUDING UNCERTIFIED / INELIGIBLE BENEFICIARIES AT 22% WITHHOLDING RATE. IF THERE ARE MORE THAN 7 BENEFICIAL OWNERS PLEASE CALL WONJAE LEE AT THE NUMBER ABOVE FOR A PRE-FORMATTED SPREADSHEET. PLEASE RETURN THE DISK AND THIS COVER LETTER ON LETTERHEAD WITH THE REQUIRED AUTHORIZED SIGNATURES TO THE ADDRESS ABOVE. **INDEMNIFICATION** I/WE CERTIFY THAT TO THE BEST OF MY KNOWLEDGE THE INDIVIDUAL BENEFICIAL OWNERS ARE ELIGIBLE FOR THE PREFERENTIAL RATES AS STATED HEREIN AND I DECLARE THAT I HAVE PERFORMED ALL THE NECESSARY DUE DILIGENCE TO SATISFY MYSELF AS TO THE ACCURACY OF THE INFORMATION SUBMITTED TO ME BY THESE BENEFICIAL OWNERS. CITIBANK, N.A. SHALL NOT BE LIABLE FOR FAILURE TO SECURE THE REFUND AND SHALL NOT BE LIABLE FOR ANY LOSS DUE TO FOREIGN EXCHANGE FLUCTUATION. ANY FUNDS ERRONEOUSLY RECEIVED SHALL BE IMMEDIATELY RETURNED TO CITIBANK, N.A. PLUS ANY INTEREST, ADDITIONS TO TAX OR PENALTIES THEREON. THIS IS NOT TAX ADVICE. PLEASE CONSULT YOUR TAX ADVISOR. ALL CLAIMS ARE SUBJECT TO AUDIT OR ANY CONTROL DEEMED APPROPRIATE BY THE KOREAN TAX AUTHORITY. INCORRECT CLAIMS COULD RESULT IN FINES AND/OR PENALTIES. WE HEREBY CERTIFY THAT WE HAVE THE APPROPRIATE AUTHORIZATION (BASED ON POWERS OF ATTORNEY OR THE CUSTODIAL/TRUST AGREEMENT). WE ASK THAT CITIBANK, N.A. APPLY TO THE KOREAN CUSTODIAN BANK FOR THE REDUCED WITHHOLDING TAX RATE ON THE ABOVE BENEFICIAL OWNERS' BEHALF. PLEASE CONTACT THE UNDERSIGNED AT [SIGNATORY'S TELEPHONE NUMBER] OR VIA EMAIL AT [SIGNATORY'S EMAIL ADDRESS] SHOULD YOU HAVE ANY QUESTIONS

#### **RECORD DATE: WINTER 2015**

### PLEASE REFER TO THE FOLLOWING CHART TO DETERMINE WITHHOLDING TAX ON DIVIDEND PAYMENTS ON KOREAN ISSUES:

COUNTRY	TOTAL TAX RATE (%)				
KOREA, REPUBLIC	INSTITUTIONAL INVESTORS	0.00			
OF	INDIVIDUAL INVESTORS	15.40			
KUWAIT, MONGOLIA		5.00			
AZERBAIJAN		7.00			
CHINA, CROATIA, CZE HUNGARY, JORDAN, F LATVIA, LITHUANIA, M NIGERIA, NEPAL, OMA RUMANIA, RUSSIA, SA THAILAND, UNITED AF	KYRGYZSTAN, LAOS, IOROCCO, MYANMAR, AN, PERU, POLAND, AUDI ARABIA, SLOVAKIA, RAB EMIRATES, VIETNAM	10.00			
COLOMBIA, ESTONIA, VENEZUELA	IRAN, QATAR,	11.00			
PAKISTAN		12.50			
ALGERIA, AUSTRALIA BELARUS, BELGIUM, O EGYPT, FIJI, FINLAND GREECE, ICELAND, IN ISRAEL, ITALY, JAPAN LUXEMBOURG, MALT, NETHERLANDS, NEW PANAMA, PAPUA NEW SINGAPORE, SLOVEN SWEDEN, SWITZERLA UNITED KINGDOM, UF	15.00				
SOUTH AFRICA, UNIT	16.50				
INDIA, TURKEY	20.00				
PHILIPPINES	PHILIPPINES				
MALAYSIA	LABUAN	22.00			
IVIALATOIA	OTHERS	15.00			
OTHER COUNTRIES, NON-CERTIFIED 422.00					

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 privator 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 administor 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
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 138-4(9) of the ED-CITA, and 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 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 Scal)  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:  9 Date of Establishment:  9 Dothers(  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 Income Tax Act ("ED-CITA") and the Article 207-2, 207-8 of the Enforcement Decree of the Personal Income Tax Act ("ED-CITA") and the Article 207-2, 207-8 of the Enforcement Decree of the Personal Income Tax Act ("ED-CITA") and the Article 207-2, 207-8 of the Enforcement Decree of the Personal Income Tax Act ("ED-CITA") and the Article 207-2, 207-8 of the Enforcement Decree of the Personal Income Tax Act ("ED-CITA") a									
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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  -in-Fact   Tax Administrator   Others    Attorney   Address or Place of Business:	Telephone Number:     Telephone Numb	23 Address:							
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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 Exemption on Koran 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								
Attomey -in-Fact    Type:	(* 5 *** * * * * * * * * * * * * * * * *						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	appropriate [ ].			(Front)
Filing No.			Filing Date	
Applicant Information	mation			
①Type of Entity	O [ ]	orporation, [ ] Pension, [ ] Fund, verseas investment vehicle recognized as Relevant tax treaty provisions: thers (	beneficial owner under tax treaty ) )	
2Name of Corpo	ration	6Address		
3Name of Repres	sentative	7Country of Residence		
4 Taxpayer Identi	ification No.	8Country Code	e	
5 Date of Incorpo	oration	9Telephone Number		
3. Determination of 11 A pension estab Officials Pension Benefits Act, etc.: 12 A fund that is exits members: Yes [13 An overseas invincorporated: Yes [14 Is the corporation of the Applicant treaty benefits? Yes	Act, Armed Forces Person Yes [ ] No [ ] stablished as a non-profit of [ ] No [ ] vestment vehicle recognize [ ] No [ ] on liable to tax under the ta on a beneficial owner of do nt or its income subject to es [ ] No [ ]	Article Paragraph Subpose Article Paragraph	partner country, which does not between Korean and the country  [ ] No [ ]  []  []  []  []  []  []  []  []  []	Tax Rate % Tax Rate %  Tax Rate %  nsion Act, Public of Workers' Retirement distribute its profits to in which it is  that deny (restrict) tax
("CITA") and Art below that there is authorized to sign 1) The Applican Application in 2) The Applican agent shall ap established. 3) The Applican	ticle 138-7 of the Enforce is no false statement in the this Application on behalf at is aware that if any of the may be less than the amount is aware that if it answere that it is an analysis and it is a second that it is a	and to submitting this Application pursuament Decree of CITA ("ED-CITA"), the econtents of this Application, and that the of the beneficial owner) of all the domestic contents of this Application is different into f withholding tax that shall be withheld in the service of the any one of the original shows ander the tax treaty between Korea and the try of the Applicant shall not apply.  Date	e Applicant is clearly aware of the Applicant is the beneficial owartic source income which this approximation from true facts, the amount of wind in accordance with the relevant estatisfying the requirements there is country in which the relevant per	he followings provided oner (or attorney-in-fact lication relates. thholding tax under this laws. eof, the withholding nsion, etc. is
	Applicant (F	Representative)	(Si	gnature or Seal)
То				
Attachment: D	ocuments substantiating th	ne fact that the Applicant falls under any o	of the categories (1)through (3)	
Attorney-in-Fact	① Type [ ] Tax Administrator [ ] Others ② Address or Place of	Corporation	Business Registration No. (Res	ident Registration No.)
	Audress of Place of	Dusiliess		

#### **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 [x] Dividend [] Royalties [] Other) Income under the Tax Treaty

* Please che	ck the appro					_		(Front)	
Receipt No.	T _		Receipt Date			Req	juired to be p	rocessed upon submission	
Beneficiary	① Name of Individual (or Corporation)								
	② Business (Resident or Alien) Registration No.								
	③ Address (or Location of Business)								
	4 Date of	(4) Date of Birth (5) Sta				ce		6 State Code	
Income Payer	_	Name of Corporation (Korean) (English) Korean Securities Depository							
	8 Name	Name of Representative Yoo Yae Hoon							
meome raye	Business (Resident or Alien) Registration No. 116-82-05363								
	® Address (or Location of Business) 4GIL 23 Yoinaru, Youngdeungpo-GU, Seoul, 150-948, Korea								
	11 Interest		[ ] Bonds [ ] Bonds Investment Trust [ ] Deposit and Savings [ ] Loans [ ] Other						
TD C	@ D: :1	. 1	[ ] Securities Inves	tment '	Trust [ ] Deer	ned Dividends			
Type of	12 Divider	ıas	[ ] Dividends between Corporations [ ] Other						
Income	13 Royalti	es	[ ] Patents, Traden	nark	[ ] Copyrights	[ ] Equipmen	t Lease [ ]	Other	
	(14) Other								
			In	terest	/ Dividend Inc	come			
			(5) Accoun	t No.				(6) Real name confirmed	
								(Unit: KRW)	
① Date o	f Pavment	(18	Amount Paid	(19	Tax Rate	20 Tax to b	e Withheld	② Tax Exempted	
	- 1 wy 111 <b>0</b> 110		) 111110 univ 1 unu		7 1 11 11 11 11 11 11 11 11 11 11 11 11	<u> </u>	***************************************	e ran zavinpreu	
	N. T. di								
	r Non-Taxation Exemption	1	Subparagraph ( ), Par	agraph	( ), Article (	) of the Tax Ti	reaty between	Korea and ( )	
② Covered Period . (Mo.) (Yr.) ~ . (Mo.) (Yr.)							(Yr.)		
I hereby sub	mit an "Appl	lication	for Non-Taxation $\cdot$	Tax I	Exemption of In	dividual (or C	orporate) Inc	come Tax on Non-Resident's	
Korean Sour	*				6-2 (or 98-4) o	f the "Income	Tax Act (o	r Corporate Tax Act)" and	
Article 207-	Article 207-2 (or 138-4) of its Enforcement Decree.								
				Annlie	Date:	1).		(Signature or Seel)	
	Applicant (Beneficiary): (Signature or Seal)  (Via) Income Payer: (Signature or Seal)								
To The Hea	nd of (		) District T			υ1.		(Signature of Sear)	
<u>-</u>	Type of Agent  Name of Individual (or Corporation)			[ ]Tax Age	ent	[ ]Other			
Agent 26									
		Business (Resident or Alien) Reg. No.							
-	· · · · · · · · · · · · · · · · · · ·	Address (or Location of Business)							
2	Competent District Tax Office								
Attached Documents			of Residence" issued			•		-	
I hereby confirm the above facts.									
-	Date:								
	Head of ( ) District Tax Office Seal								
* Irrespectiv	ve of this co	onfirma	ntion of the submit	ted ar	plication, the	head of distri	ct tax offic	e can correct or determine	

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

<sup>210</sup>mm×297mm[일반용지 60g/m²(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	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 nationality 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 (10). 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.