



Important Notice
The Depository Trust Company

B #:	14357-20
Date:	December 24, 2020
To:	All Participants
Category:	Tax Relief, Distributions
From:	International Services
Attention:	Operations, Reorg & Dividend Managers, Partners & Cashiers
Subject:	<u>Tax Relief</u> – Country: Korea <u>Depository for Sponsored DR Program:</u> Citibank <u>Securities:</u> See Below <u>CUSIP(s):</u> Please refer to Dividend Event Matrix for list of CUSIPs <u>Record Date:</u> 12/31/20 <u>Payable Date:</u> TBD <u>Relief at Source CA Web Cut-Off:</u> 01/29/2021 8:00 PM ET

Issue	CUSIP
GRAVITY	38911N206
HANWHA CHEMICAL CORP 144A	411358302
HANWHA CHEMICAL CORP REGS	411358401
HYUNDAI MOTOR CO	449187707
HYUNDAI MOTOR CO	449187103
HYUNDAI MOTOR COMPANY	449187509
INDUSTRIAL BANK KOREA	456036102
KOREA ELECTRIC POWER CORP	500631106
KT CORPORATION	48268K101
KAKAO CORP. 144A	48312K107
KTG CORPORATION	48268G100
LG DISPLAY CO LTD	50186V102
LG ELECT INC. (COMMON STK)	50186Q103

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

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

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Important Notice
The Depository Trust Company

LG ELECT INC. (NON-VOTING)	50186Q202
POSCO	693483109
SAMSUNG ELE COMMON-VOTING	796050888
SAMSUNG ELECTRONICS CO LTD (NV)	796050201
SAMSUNG SDI CO. LTD	796054203
SHINHAN FINANCIAL GROUP	824596100
SK HYNIX INC	78392B107
SK TELECOM CO LTD	78440P108
WOORI BANK	981064108

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.

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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.

DTCC offers enhanced access to all important notices via a Web-based subscription service. The notification system leverages RSS Newsfeeds, providing significant benefits including real-time updates and customizable delivery. To learn more and to set up your own DTCC RSS alerts, visit http://www.dtcc.com/subscription_form.php.

South Korean issuers have announced a cash dividend and **Citibank, N.A.** acts as Depository for the Depository 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.

As outlined in the Eligibility Matrix below, all qualifying holders will have the opportunity to receive their full treaty benefits on DR pay date. Holders not certified at the favorable or exempt withholding tax rates through CA Web will receive the dividend net of the full South Korean statutory withholding tax rate of 22% with the possibility to reclaim through the standard long form process.

SOUTH KOREAN DIVIDENDS WITH DECEMBER 2020 RECORD DATES ARE OUTLINED IN THE DIVIDEND EVENT MATRIX

Please be advised that the Korean depository is accepting electronic scans for relief-at-source for this cycle, with original documentation to be sent upon request in the future.

The Korean relief at source process requires that all shares, favorable and unfavorable, be taken into account. When submitting via ESP, please enter your total record date position when prompted at the start. You will only be required to disclose on favorable shares.

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DIVIDEND EVENT MATRIX

ISSUE	CUSIP#	UNDERLYING ISIN	DR RECORD DATE	RATIO (ORD to DR)
GRAVITY CO, LTD	38911N206	KR7077380004	12/31/2020	1 : 1
HANWHA CHEMICAL CORP 144A	411358302	KR7009830001	12/31/2020	1 : 1
HANWHA CHEMICAL CORP REG S	411358401	KR7009830001	12/31/2020	1 : 1
HYUNDAI MOTOR CORP (103)	449187103	KR7005381009	12/31/2020	1 : 2
HYUNDAI MOTOR CORP (509)	449187509	KR7005382007	12/31/2020	1 : 2
HYUNDAI MOTOR CORP (707)	449187707	KR7005380001	12/31/2020	1 : 2
INDUSTRIAL BANK KOREA	456036102	KR7024110009	12/31/2020	1 : 1
KAKAO CORP. 144A	48312K107	KR7035720002	12/31/2020	1 : 1
KOREA ELECTRIC POWER CORP	500631106	KR7015760002	12/31/2020	1 : 2
KT CORPORATION	48268K101	KR7030200000	12/31/2020	1 : 2
KTG CORPORATION	48268G100	KR7033780008	12/31/2020	1 : 2
LG DISPLAY CO LTD	50186V102	KR7034220004	12/31/2020	1 : 2
LG ELECT INC. (COMMON STK)	50186Q103	KR7066570003	12/31/2020	1 : 2
LG ELECT INC. (NON-VOTING)	50186Q202	KR7066571001	12/31/2020	1 : 2
POSCO	693483109	KR7005490008	12/31/2020	1 : 4
SAMSUNG ELE COMMON-VOTING	796050888	KR7005930003	12/31/2020	25 : 1
SAMSUNG ELECTRONICS CO LTD (NV)	796050201	KR7005931001	12/31/2020	25 : 1
SAMSUNG SDI CO. LTD	796054203	KR7006400006	12/31/2020	1 : 4
SHINHAN FINANCIAL GROUP	824596100	KR7055550008	12/31/2020	1 : 1
SK HYNIX INC	78392B107	KR7000660001	12/31/2020	1 : 1
SK TELECOM CO LTD	78440P108	KR7017670001	12/31/2020	1 : 9
WOORI FINANCIAL GROUP INC.	981064108	KR7316140003	12/31/2020	3 : 1

NOTE: All dividends listed above have ORD and DR Pay Dates to be determined.

FEES & DEADLINES

FILING METHOD	BATCH	PAYMENT METHOD	CUSTODIAL FEE	DSC FEE	MINIMUM FEE PER BENEFICIAL OWNER	FINAL SUBMISSION DEADLINE (ESP)
RELIEF AT SOURCE – NON-EXEMPT BENEFICIAL OWNERS	PAYMENT ON PAY DATE	VIA DTC	NO FEE	UP TO \$0.0050 PER DR	\$0	JANUARY 29, 2021 8:00 P.M. EST
RELIEF AT SOURCE – TAX EXEMPT BENEFICIAL OWNERS	PAYMENT ON PAY DATE	VIA DTC	NO FEE	UP TO \$0.0075 PER DR	\$0	JANUARY 29, 2021 8:00 P.M. EST
LONG FORM	POST-CA WEB PROCESS; ONGOING	VIA CHECK OR ACH	KRW 50,000	UP TO \$0.0075 PER DR	\$25.00 *ADDITIONAL WIRE FEES MAY APPLY	NOVEMBER 1, 2025

ELIGIBILITY MATRIX – RELIEF AT SOURCE

RATE DESCRIPTION	RECLAIM RATE	ELIGIBLE RESIDENTS	DOCUMENTATION REQUIRED	SIGNATURE REQUIRED
EXEMPT - 0%	22%	LEGAL ENTITIES DOMICILED IN SOUTH KOREA	<ol style="list-style-type: none"> APPENDIX A COMPANY/BUSINESS REGISTRATION ID# ORIGINAL CERTIFICATE OF RESIDENCY (MUST STATE YEAR OF PAYABLE DATE) 	<ol style="list-style-type: none"> YES – DTC PARTICIPANT COPY N/A
		WORLD EXEMPT ENTITIES	<ol style="list-style-type: none"> APPENDIX A FORM 29-2 SUPPORTING DOCUMENTS TO PROVE WORLD EXEMPT STATUS CERTIFICATE OF RESIDENCY (TAX YEAR MUST MATCH YEAR OF PAY DATE) 	<ol style="list-style-type: none"> YES – DTC PARTICIPANT YES – BENEFICIAL OWNER OR BROKER WITH POA N/A ORIGINAL VALID FOR 3 YEARS FROM ISSUE DATE
FAVORABLE - 5%	17%	CZECH REPUBLIC, KUWAIT, MONGOLIA	<ol style="list-style-type: none"> APPENDIX A <p style="text-align: center;">**PLEASE SEE ADDITIONAL DOCUMENTATION REQUIREMENTS ON PAGE 5**</p>	<ol style="list-style-type: none"> YES – DTC PARTICIPANT
FAVORABLE - 7%	15%	AZERBAIJAN	<ol style="list-style-type: none"> APPENDIX A <p style="text-align: center;">**PLEASE SEE ADDITIONAL DOCUMENTATION REQUIREMENTS ON PAGE 5**</p>	<ol style="list-style-type: none"> YES – DTC PARTICIPANT
FAVORABLE - 8%	14%	ETHIOPIA	<ol style="list-style-type: none"> APPENDIX A <p style="text-align: center;">**PLEASE SEE ADDITIONAL DOCUMENTATION REQUIREMENTS ON PAGE 5**</p>	<ol style="list-style-type: none"> YES – DTC PARTICIPANT
FAVORABLE - 10%	12%	ALBANIA, BAHRAIN, BRAZIL, BRUNEI, BULGARIA, CHILE, CHINA, CROATIA, ECUADOR, ESTONIA, GEORGIA, HUNGARY, IRAN, JORDAN, KENYA, KYRGYZSTAN, LAOS, LATVIA, LITHUANIA, MOROCCO, MYANMAR, NEPAL, OMAN, PERU, POLAND, QATAR, ROMANIA, RUSSIA, SAUDI ARABIA, SERBIA, SLOVAKIA, TAJIKISTAN, THAILAND, TURKMENISTAN, UNITED ARAB EMIRATES, VENEZEULA, VIETNAM	<ol style="list-style-type: none"> APPENDIX A <p style="text-align: center;">**PLEASE SEE ADDITIONAL DOCUMENTATION REQUIREMENTS ON PAGE 5**</p>	<ol style="list-style-type: none"> YES – DTC PARTICIPANT
FAVORABLE - 11%	11%	COLOMBIA	<ol style="list-style-type: none"> APPENDIX A <p style="text-align: center;">**PLEASE SEE ADDITIONAL DOCUMENTATION REQUIREMENTS ON PAGE 5**</p>	<ol style="list-style-type: none"> YES – DTC PARTICIPANT

Note:

- All documents listed in **BLUE font** are generated by GlobeTax's ESP website after submission of beneficial owner data.
- According to the Korean Income Tax Act, tax may not be withheld on positions where withholding tax amount is less than KRW 1,000.

ELIGIBILITY MATRIX – RELIEF AT SOURCE (CONTINUED)

RATE DESCRIPTION	RECLAIM RATE	ELIGIBLE RESIDENTS	DOCUMENTATION REQUIRED	SIGNATURE REQUIRED
FAVORABLE - 12.50%	9.50%	PAKISTAN	1. APPENDIX A **PLEASE SEE ADDITIONAL DOCUMENTATION REQUIREMENTS ON PAGE 5**	1. YES – DTC PARTICIPANT
FAVORABLE - 15%	7%	ALGERIA, AUSTRALIA, AUSTRIA, BANGLADESH, BELARUS, BELGIUM, CANADA, DENMARK, EGYPT, FIJI, FINLAND, FRANCE, GABON, GERMANY, GREECE, HONG KONG, ICELAND, INDIA, INDONESIA, IRELAND, ISRAEL, ITALY, JAPAN, KAZAKHSTAN, LUXEMBOURG, MALTA, MEXICO, NETHERLANDS, NEW ZEALAND, NORWAY, PANAMA, PAPUA NEW GUINEA, PORTUGAL, SINGAPORE, SLOVENIA, SPAIN, SRI LANKA, SWEDEN, SWITZERLAND, TUNISIA, UKRAINE, UNITED KINGDOM, URUGUAY, UZBEKISTAN	1. APPENDIX A **PLEASE SEE ADDITIONAL DOCUMENTATION REQUIREMENTS ON PAGE 5**	1. YES – DTC PARTICIPANT
FAVORABLE - 15.40%	6.60%	INDIVIDUAL RESIDENTS DOMICILED IN SOUTH KOREA	1. APPENDIX A 2. PASSPORT OR RESIDENT REGISTRATION ID#	1. YES – DTC PARTICIPANT 2. COPY
FAVORABLE - 16.50%	5.50%	SOUTH AFRICA, UNITED STATES	1. APPENDIX A **PLEASE SEE ADDITIONAL DOCUMENTATION REQUIREMENTS ON PAGE 5**	1. YES – DTC PARTICIPANT
FAVORABLE - 20%	2%	TURKEY	1. APPENDIX A **PLEASE SEE ADDITIONAL DOCUMENTATION REQUIREMENTS ON PAGE 5**	1. YES – DTC PARTICIPANT
UNFAVORABLE - 22%	0%	LABAUN (MALAYSIA), PHILIPPINES, OTHER COUNTRIES, NON-CERTIFIED HOLDERS	NO DOCS OR ESP SUBMISSION NEEDED	NONE

Note:

- 1) All documents listed in **BLUE font** are generated by GlobeTax's ESP website after submission of beneficial owner data.
- 2) According to the Korean Income Tax Act, tax may not be withheld on positions where withholding tax amount is less than KRW 1,000.

ADDITIONAL DOCUMENTATION REQUIREMENTS

INVESTOR TYPE	ELIGIBILITY CRITERIA / DEFINITION	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	1) REPORT OF OVERSEAS INVESTMENT VEHICLE (FORM 29-13; SECTION 2) 2) SCHEDULE OF BENEFICIAL OWNERS (ANNEX TO FORM 29-13)	ORIGINALS WILL REMAIN VALID FOR UP TO THREE YEARS (FROM ISSUED DATE) PROVIDED THE UNDERLYING HOLDERS OF THE OIV DO NOT CHANGE DURING THAT TIME.	OIV
OVERSEAS PUBLIC COLLECTIVE INVESTMENT VEHICLE (OPCIV)	AN OIV THAT ALSO SATISFIES ALL REQUIREMENTS BELOW: I) OPCIV SHOULD BE AN OIV 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) 2) PROSPECTUS 3) DOCUMENTS EVIDENCING THAT THE OPCIV IS REGISTERED AS AN INVESTMENT VEHICLE TO ITS COUNTRY OF RESIDENCE (E.G. CERTIFICATE OF INCORPORATION)	ORIGINALS WILL REMAIN VALID FOR UP TO THREE YEARS (FROM ISSUED DATE) PROVIDED THE UNDERLYING HOLDERS OF THE OPCIV DO NOT CHANGE DURING THAT TIME.	OPCIV
OIV OR OPCIV CONSIDERED THE BENEFICIAL OWNER UNDER THE NEW TAX ACT	AN OIV / OPCIV THAT SATISFIES ALL OF THE REQUIREMENTS BELOW AND IS CONSIDERED THE BENEFICIAL OWNER UNDER THE NEW TAX ACT: I) IS LIABLE FOR TAX IN ITS RESIDENT COUNTRY; AND II) IS NOT ESTABLISHED FOR PURPOSES OF TAX EVASION ON DOMESTIC SOURCE INCOME.	1) DELCARATION OF OIV / OPCIV TREATED AS THE BO OF KOREAN SOURCE INCOME (FORM 72-5) 2) CERTIFICATE OF RESIDENCY, FORM 6166 (MUST CONTAIN TAX ID) 3) DOCUMENTS EVIDENCING THAT THE OIV / OPCIV IS REGISTERED AS AN INVESTMENT VEHICLE TO ITS COUNTRY OF RESIDENCE (E.G. CERTIFICATE OF INCORPORATION)	ORIGINALS WILL REMAIN VALID FOR UP TO THREE YEARS (FROM ISSUED DATE) PROVIDED THE UNDERLYING HOLDERS OF THE OIV / OPCIV DO NOT CHANGE DURING THAT TIME.	OIV / OPCIV & LOCAL TAX AUTHORITIES

ADDITIONAL DOCUMENTATION REQUIREMENTS (CONTINUED)

INVESTOR TYPE	ELIGIBILITY CRITERIA / DEFINITION	ADDITIONAL DOCUMENTATION REQUIRED	VALIDITY OF DOCUMENTATION	COMPLETED BY
PENSIONS, NON-PROFIT ORGANIZATIONS, & GOVERNMENT ENTITIES	<p style="text-align: center;">DEEMED BENEFICIAL OWNERS (“BO”):</p> <p>I) A PENSION FUND ESTABLISHED UNDER THE LAWS OF A TAX TREATY PARTNER COUNTRY, WHICH ARE EQUIVALENT TO THE <i>KOREAN NATIONAL PENSION ACT, THE PUBLIC OFFICIALS PENSION ACT, THE MILITARY PENSION ACT, THE PENSION FOR PRIVATE SCHOOL TEACHERS AND STAFF ACT, THE ACT ON THE GUARANTEE OF WORKERS’ RETIREMENT BENEFITS, ETC.</i>;</p> <p>II) A FUND ESTABLISHED IN A FOREIGN COUNTRY PURSUANT TO THE LAWS OF COUNTRY OF THE CONTRACTUAL COUNTER-PARTY WHICH DOES NOT DISTRIBUTE ITS PROFITS TO ITS INVESTORS; OR</p> <p>III) AN OIV RECOGNIZED AS THE BO UNDER THE TAX TREATY.</p>	<p>COR MUST SPECIFY A LAW OF ESTABLISHMENT TO BE VALID OR IF FORM 6166, MUST INCLUDE RELEVANT IRS CODE: 457(g), 457(b), 401(a), 501(a), 501(c)(3), or 81-100</p> <p>(IF UNABLE TO PROVIDE PROPER COR, SUBMIT DOCUMENTATION REQUIREMENTS FOR <i>OIV/OPCIV</i> CONSIDERED THE BO)</p>	<p>ORIGINALS WILL REMAIN VALID FOR UP TO THREE YEARS (FROM ISSUED DATE) FOR ALL COUNTRIES EXCEPT SOUTH KOREA</p>	<p>LOCAL TAX AUTHORITIES</p>
SOUTH KOREAN LEGAL ENTITIES	<p style="text-align: center;">SEE RELIEF AT-SOURCE MATRIX FOR DETAILS</p>	<p style="text-align: center;">ORIGINAL COR</p>	<p style="text-align: center;">YEAR OF PAYABLE DATE</p>	<p>LOCAL TAX AUTHORITIES</p>

ELIGIBILITY MATRIX – LONG FORM

RATE DESCRIPTION	ELIGIBLE RESIDENTS	DOCUMENTATION REQUIRED	SIGNATURE REQUIRED
<p>RATES VARY BASED ON COUNTRY OF RESIDENCE</p> <p>PLEASE REFER TO THE RELIEF AT SOURCE ELIGIBILITY MATRIX ON PAGES 4-5 FOR RATES</p>	INDIVIDUALS	<ol style="list-style-type: none"> 1. APPENDIX A 2. STATEMENT OF ELECTION LETTER 3. CERTIFICATE OF RESIDENCE (TAX YEAR MUST MATCH YEAR OF PAY DATE & MUST CONTAIN TAX ID) 4. ORIGINAL FORM 29-14 	<ol style="list-style-type: none"> 1. YES – DTC PARTICIPANT 2. YES – DTC PARTICIPANT 3. ORIGINAL VALID FOR 3 YEARS FROM ISSUE DATE 4. YES – BENEFICIAL OWNER OR DTC PARTICIPANT WITH POA
	CORPORATIONS, PENSIONS, NON-PROFIT ORGANIZATIONS	<ol style="list-style-type: none"> 1. APPENDIX A 2. STATEMENT OF ELECTION LETTER 3. CERTIFICATE OF RESIDENCE (TAX YEAR MUST MATCH YEAR OF PAY DATE & MUST CONTAIN TAX ID) 4. ORIGINAL FORM 72-3 	<ol style="list-style-type: none"> 1. YES – DTC PARTICIPANT 2. YES – DTC PARTICIPANT 3. ORIGINAL VALID FOR 3 YEARS FROM ISSUE DATE 4. YES – BENEFICIAL OWNER OR DTC PARTICIPANT WITH POA
	WORLD EXEMPT ENTITIES	<ol style="list-style-type: none"> 1. APPENDIX A 2. STATEMENT OF ELECTION LETTER 3. CERTIFICATE OF RESIDENCE (TAX YEAR MUST MATCH YEAR OF PAY DATE & MUST CONTAIN TAX ID) 4. ORIGINAL FORM 29-2 AND FORM 72-3 	<ol style="list-style-type: none"> 1. YES – DTC PARTICIPANT 2. YES – DTC PARTICIPANT 3. ORIGINAL VALID FOR 3 YEARS FROM ISSUE DATE 4. YES – BENEFICIAL OWNER OR DTC PARTICIPANT WITH POA
	OIV / OPCIV INVESTORS	<ol style="list-style-type: none"> 1. APPENDIX A 2. STATEMENT OF ELECTION LETTER 3. CERTIFICATE OF RESIDENCE (TAX YEAR MUST MATCH YEAR OF PAY DATE & MUST CONTAIN TAX ID) PER UNDERLYING HOLDER 4. ORIGINAL FORM 29-11 5. ORIGINAL FORM 72-3 OR 29-14 FOR EACH UNDERLYING HOLDER 	<ol style="list-style-type: none"> 1. YES – DTC PARTICIPANT 2. YES – DTC PARTICIPANT 3. ORIGINAL VALID FOR 3 YEARS FROM ISSUE DATE 4. YES – BENEFICIAL OWNER OR DTC PARTICIPANT WITH POA 5. YES – BENEFICIAL OWNER OR DTC PARTICIPANT WITH POA
	OIV / OPCIV CONSIDERED THE BENEFICIAL OWNER	<ol style="list-style-type: none"> 1. APPENDIX A 2. STATEMENT OF ELECTION LETTER 3. CERTIFICATE OF RESIDENCE (TAX YEAR MUST MATCH YEAR OF PAY DATE & MUST CONTAIN TAX ID) 4. CERTIFICATE OF INCORPORATION 5. ORIGINAL FORM 72-3 6. ORIGINAL FORM 72-5 	<ol style="list-style-type: none"> 1. YES – DTC PARTICIPANT 2. YES – DTC PARTICIPANT 3. ORIGINAL VALID FOR 3 YEARS FROM ISSUE DATE 4. ISSUED FROM LOCAL SUPERVISORY OFFICE OR AGENCY 5. YES – BENEFICIAL OWNER OR DTC PARTICIPANT WITH POA 6. YES – BENEFICIAL OWNER OR DTC PARTICIPANT WITH POA

*Note: All documents listed in [BLUE font](#) are generated by GlobeTax's ESP website after submission of beneficial owner data.

DESCRIPTION OF VARIOUS DOCUMENTATION	
DOCUMENT NAME	DESCRIPTION
APPENDIX A (COVER LETTER)	Indemnification and listing of Beneficial Owners generated by ESP.
FORM 29-13	OIV / OPCIV disclosure form: An original document is required and remains valid for a period of three years, provided that the underlying beneficiary information does not change <u>NOTE:</u> As of March 2016, the window to report changes to the underlying beneficiaries was extended from three to six months. Any change in the underlying holders of the OIV / OPCIV requires a new, original form 29-13.
ANNEX TO FORM 29-13	Additional disclosure for OIV's only: Additional disclosure information pertaining to each underlying beneficial owner in the OIV.
FORM 29-2	Exemption form for World Exempt Entities.
FORM 72-5	Disclosure forms for OIVs and OPCIVs considered the beneficial owner: An original document is required and remains valid for a period of three years, provided that the underlying beneficiary information does not change.
FORM 72-3	Korean tax form to accompany Long Form reclaims for Non-Individual entities.
FORM 29-14	Korean tax form to accompany Long Form reclaims for Individuals.
STATEMENT OF ELECTION LETTER	Letter issued to the Korean Securities Depository on behalf of the DTC Participant explaining why the Beneficial Owner was not disclosed in the initial batch and the course of action you wish to be taken.

CONTACT DETAILS	
PRIMARY CONTACT	ELSON SU
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
GROUP EMAIL	KOREAESP@GLOBETAX.COM
COMPANY	GLOBETAX SERVICES INC.
STREET ADDRESS	ONE NEW YORK PLAZA, 34 TH FLOOR
CITY/STATE/ZIP	NEW YORK, NY 10004
ADDITIONAL CONTACTS	EILEEN CHAN

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 GlobeTax and creates applicable documentation on the Participants' behalf.

Submit the data online through the web site below, print out the documents on letterhead, sign them, and mail them to GlobeTax, along with the necessary required documents.

These claims should be submitted through the following web site.

<https://ESP.GlobeTax.com>

Please contact us via the [ESP Service Desk](mailto:ESP@GLOBETAX.COM) at 212-747-9100 if you have any questions about this process.

FREQUENTLY ASKED QUESTIONS (FAQs)

<p>Do Luxembourg residents need to submit two original certificates of residence in order to benefit from treaty relief?</p>	<p>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.</p>
<p>How are World Exempt entities treated?</p>	<p>A copy of supporting documentation & form 29-2 (1) must accompany the claim in order to receive the exempt rate of 0%.</p>
<p>What if a holder resides in a jurisdiction where TINs are not issued (e.g. Japan)?</p>	<p>Valid personal IDs, which include date of birth (individuals) or date of establishment (non-individuals) in MMDDYYYY format, must be given.</p>
<p>Are there additional fees involved for the standard long form process?</p>	<p>Effective January 1, 2011, post pay-date processing will be subject to custodial processing fee of KRW 50,000 per beneficial owner.</p>
<p>What if the participant is unable to submit documentation by the submission deadline?</p>	<p>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.</p>
<p>Do we need to disclose the underlying holders of OIVs/OPCIVS?</p>	<p>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).</p> <p>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.</p>
<p>What types of entities are considered OIVs under the intentions of the South Korean regulations?</p>	<p>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 Citibank nor KSD will be able to validate these categorizations.</p>
<p>What types of entities are considered OPCIVs under the intentions of the South Korean regulations?</p>	<p>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 Citibank nor KSD will be able to validate these categorizations.</p>
<p>How do we use ESP to disclose a beneficial owner as World Exempt?</p>	<p>Please select the ISO code 'OO' on the ESP dropdown menu to report a beneficial owner as a world exempt entity.</p>
<p>Can I be asked to submit additional documentation?</p>	<p>Yes, the South Korean Authorities maintain the right to request additional documentation as they see fit.</p>

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.

INDEMNIFICATION:

I/we have determined that the beneficial owner(s) of the shares (individual or legal entity) is 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.

I/ we hereby certify that I/we will indemnify Citibank, N.A., (and its agents) for any liability Citibank, N.A. may incur as a result of reliance upon information provided by such participant in connection with a c.a. web election, a claim for refund, or a failure to provide information requested by the tax authorities. Citibank, N.A. shall not be liable for failure to secure the refund. The participant shall be liable for any loss due to foreign exchange fluctuation. The participant agrees to immediately return to Citibank, N.A. any funds erroneously received as a result of an improper EDS election or refund claim. In addition, the participant agrees to pay any interest, additions to tax or penalties thereon. This is not tax advice. Please consult your tax advisor.

FORMS AND ATTACHMENTS

**Double click on respective icon to view attachment.*

FORM 72-5



FORM 72-5.pdf

FORM 29-13



FORM 29-13.pdf

FORM 29-2



FORM 29-2.pdf

LONG FORM DOCUMENTS



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