



Important Notice
The Depository Trust Company

| | |
|-------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| B #: | 13087-20 |
| Date: | March 26, 2020 |
| To: | All Participants |
| Category: | Dividends |
| From: | International Services |
| Attention: | Operations, Reorg & Dividend Managers, Partners & Cashiers |
| Subject: | <p><u>Tax Relief</u> – Country: KOREA</p> <p><u>SECURITY:</u> SAMSUNG ELE COMMON-VOTING/ SAMSUNG ELECTRONICS CO LTD(NV) <u>CUSIP(s): 796050888/796050201</u></p> <p><u>Record Date:</u> 03/31/2020 <u>Payable Date:</u> TBA</p> <p><u>CA Web Cut-Off:</u> 04/16/2020 8:00 PM ET</p> |

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 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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Non-Confidential

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

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 MARCH 2020 RECORD DATES ARE OUTLINED IN THE DIVIDEND EVENT MATRIX BELOW.

Please note updated required supporting documents found in ADDITIONAL DOCUMENTATION REQUIREMENTS.

Effective January 1, 2020, there is a new set of tax forms for OIVs and OPCIVs that are classified as corporations. These entities may also be eligible to file as the beneficial owner of the income under a new Korean tax act. Please be advised there are updated documentation requirements for this new class of OIVs / OPCIVs; however, it is still possible to utilize any Form 29-13 documents you may have on file. For more information, please see page 6 of this notice or contact KoreaESP@globetax.com.

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.

Table of Contents

| | |
|----------------------------------------------------------|-----------|
| FEES & DEADLINES | 2 |
| DIVIDEND EVENT MATRIX | 2 |
| ELIGIBILITY MATRIX – RELIEF AT SOURCE | 3 |
| ELIGIBILITY MATRIX – RELIEF AT SOURCE (CONTINUED) | 4 |
| ADDITIONAL DOCUMENTATION REQUIREMENTS | 5 |
| ADDITIONAL DOCUMENTATION REQUIREMENTS (CONTINUED) | 6 |
| ELIGIBILITY MATRIX – LONG FORM | 7 |
| DESCRIPTION OF VARIOUS DOCUMENTATION | 8 |
| CONTACT DETAILS | 8 |
| FREQUENTLY ASKED QUESTIONS (FAQs) | 9 |
| FORMS AND ATTACHMENTS | 10 |

DIVIDEND EVENT MATRIX

| ISSUE | CUSIP# | UNDERLYING ISIN | DR RECORD DATE | RATIO (ORD to DR) |
|---------------------------------|-----------|-----------------|----------------|-------------------|
| SAMSUNG ELE COMMON-VOTING | 796050888 | KR7005930003 | 03/31/2020 | 25 : 1 |
| SAMSUNG ELECTRONICS CO LTD (NV) | 796050201 | KR7005931001 | 03/31/2020 | 25 : 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 | APRIL 16, 2020 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 | APRIL 16, 2020 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 | FEBRUARY 01, 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% | 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, CZECH REPUBLIC, ECUADOR, GEORGIA, HUNGARY, JORDAN, KENYA, KYRGYZSTAN, LAOS, LATVIA, LITHUANIA, MOROCCO, MYANMAR, NEPAL, OMAN, PERU, POLAND, ROMANIA, RUSSIA, SAUDI ARABIA, SERBIA, SLOVAKIA, TAJIKISTAN, THAILAND, TURKMENISTAN, UNITED ARAB EMIRATES, 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, ESTONIA, IRAN, QATAR, VENEZUELA | <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:
- 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.

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) DOCUMENTS EVIDENCING THAT THE OPCIV IS REGISTERED AS AN INVESTMENT VEHICLE TO ITS COUNTRY OF RESIDENCE, AND PROSPECTUS (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 / OPCIV THAT DOES NOT DISTRIBUTE ITS PROFIT TO ITS INVESTORS | AN OIV/OPCIV THAT SATISFIES EITHER ONE OF THE CONDITIONS BELOW: I) A PENSION ESTABLISHED IN A FOREIGN COUNTRY PURSUANT TO THE LAWS OF COUNTRY OF THE CONTRACTUAL COUNTER-PARTY EQUIVALENT TO <i>THE NATIONAL PENSION ACT, THE PUBLIC OFFICIALS PENSION ACT, THE MILITARY PENSION ACT, THE PENSION FOR PRIVATE SCHOOL TEACHERS AND STAFF ACT, AND THE ACT ON THE GUARANTEE OF WORKERS' RETIREMENT BENEFITS</i> 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 | 1) REPORT OF OVERSEAS INVESTMENT VEHICLE (FORM 29-13; SECTION 1 OR 2) 2) COR, FORM 6166 (MUST SPECIFY A LAW OF ESTABLISHMENT TO BE VALID) | 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 |
| OIV CLASSIFIED AS A CORPORATION | AN OIV THAT SATISFIES ALL OF THE REQUIREMENTS BELOW: I) SHOULD BE CLASSIFIED AS A CORPORATION; II) IS LIABLE FOR TAX IN ITS RESIDENT COUNTRY; AND III) IS NOT ESTABLISHED FOR PURPOSES OF TAX EVASION ON DOMESTIC SOURCE INCOME. | 1) REPORT OF OVERSEAS INVESTMENT VEHICLE (FORM 72-5A; SECTION 2) 2) SCHEDULE OF BENEFICIAL OWNERS (ANNEX TO FORM 72-5A) | 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 |

ADDITIONAL DOCUMENTATION REQUIREMENTS (CONTINUED)

| INVESTOR TYPE | ELIGIBILITY CRITERIA / DEFINITION | ADDITIONAL DOCUMENTATION REQUIRED | VALIDITY OF DOCUMENTATION | COMPLETED BY |
|-----------------------------------------------------------------------------------------------------------|-------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|----------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------|
| OPCIV CLASSIFIED AS A CORPORATION | <p>AN OPCIV THAT SATISFIES ALL OF THE REQUIREMENTS BELOW:</p> <p>I) SHOULD BE CLASSIFIED AS A CORPORATION;</p> <p>II) IS LIABLE FOR TAX IN ITS RESIDENT COUNTRY; AND</p> <p>III) IS NOT ESTABLISHED FOR PURPOSES OF TAX EVASION ON DOMESTIC SOURCE INCOME.</p> | <p>1) REPORT OF OVERSEAS INVESTMENT VEHICLE (FORM 72-5A; SECTION 1)</p> <p>2) DOCUMENTS EVIDENCING THAT THE OPCIV IS REGISTERED AS AN INVESTMENT VEHICLE TO ITS COUNTRY OF RESIDENCE, AND PROSPECTUS (E.G. CERTIFICATE OF INCORPORATION)</p> | <p>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.</p> | <p>OPCIV & LOCAL TAX AUTHORITIES</p> |
| OIV OR OPCIV CLASSIFIED AS A CORPORATION AND CONSIDERED THE BENEFICIAL OWNER UNDER THE NEW TAX ACT | <p>AN OIV / OPCIV THAT SATISFIES ALL OF THE REQUIREMENTS BELOW AND IS CONSIDERED THE BENEFICIAL OWNER UNDER THE NEW TAX ACT:</p> <p>I) SHOULD BE CLASSIFIED AS A CORPORATION;</p> <p>II) IS LIABLE FOR TAX IN ITS RESIDENT COUNTRY; AND</p> <p>III) IS NOT ESTABLISHED FOR PURPOSES OF TAX EVASION ON DOMESTIC SOURCE INCOME.</p> | <p>1) REPORT OF OVERSEAS INVESTMENT VEHICLE (FORM 72-5B)</p> <p>2) COR, FORM 6166 (MUST CONTAIN TAX ID)</p> <p>3) DOCUMENTS EVIDENCING THAT THE OIV / OPCIV IS REGISTERED AS AN INVESTMENT VEHICLE TO ITS COUNTRY OF RESIDENCE (E.G. CERTIFICATE OF INCORPORATION)</p> | <p>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.</p> | <p>OIV / OPCIV & LOCAL TAX AUTHORITIES</p> |
| PENSIONS & NON-PROFIT ORGANIZATIONS | <p>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 KOREAN <i>NATIONAL PENSION ACT</i>, <i>THE PUBLIC OFFICIALS PENSION ACT</i>, <i>THE MILITARY PENSION ACT</i>, <i>THE PENSION FOR PRIVATE SCHOOL TEACHERS AND STAFF ACT</i>, <i>THE ACT ON THE GUARANTEE OF WORKERS' RETIREMENT BENEFITS</i>, ETC.;</p> <p>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</p> <p>III) AN OIV RECOGNIZED AS THE BO UNDER THE TAX TREATY.</p> | <p>DOCUMENTS SUBSTANTIATING THE FACT THE APPLICANT FALLS UNDER ANY OF THE CATEGORIES I) THROUGH III)</p> <p>(E.G. COR, FORM 6166)</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>SEE RELIEF AT-SOURCE MATRIX FOR DETAILS</p> | <p>ORIGINAL COR</p> | <p>YEAR OF PAYABLE DATE</p> | <p>LOCAL TAX AUTHORITIES</p> |


ELIGIBILITY MATRIX – LONG FORM

| RATE DESCRIPTION | ELIGIBLE RESIDENTS | DOCUMENTATION REQUIRED | SIGNATURE REQUIRED |
|------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| RATES VARY BASED ON COUNTRY OF RESIDENCE. PLEASE REFER TO THE RELIEF AT SOURCE ELIGIBILITY MATRIX ON PAGES 4-5 FOR RATES. | INDIVIDUALS | <ol style="list-style-type: none"> APPENDIX A STATEMENT OF ELECTION LETTER CERTIFICATE OF RESIDENCE (TAX YEAR MUST MATCH YEAR OF PAY DATE & MUST CONTAIN TAX ID) ORIGINAL FORM 29-14 | <ol style="list-style-type: none"> YES – DTC PARTICIPANT YES – DTC PARTICIPANT ORIGINAL VALID FOR 3 YEARS FROM ISSUE DATE YES – BENEFICIAL OWNER OR DTC PARTICIPANT WITH POA |
| | CORPORATIONS, PENSIONS, CHARITIES | <ol style="list-style-type: none"> APPENDIX A STATEMENT OF ELECTION LETTER CERTIFICATE OF RESIDENCE TAX YEAR MUST MATCH YEAR OF PAY DATE & MUST CONTAIN TAX ID) ORIGINAL FORM 72-3 | <ol style="list-style-type: none"> YES – DTC PARTICIPANT YES – DTC PARTICIPANT ORIGINAL VALID FOR 3 YEARS FROM ISSUE DATE YES – BENEFICIAL OWNER OR DTC PARTICIPANT WITH POA |
| | WORLD EXEMPT ENTITIES | <ol style="list-style-type: none"> APPENDIX A STATEMENT OF ELECTION LETTER CERTIFICATE OF RESIDENCE TAX YEAR MUST MATCH YEAR OF PAY DATE & MUST CONTAIN TAX ID) ORIGINAL FORM 29-2 AND FORM 72-3 | <ol style="list-style-type: none"> YES – DTC PARTICIPANT YES – DTC PARTICIPANT ORIGINAL VALID FOR 3 YEARS FROM ISSUE DATE YES – BENEFICIAL OWNER OR DTC PARTICIPANT WITH POA |
| | OIV / OPCIV INVESTORS | <ol style="list-style-type: none"> APPENDIX A STATEMENT OF ELECTION LETTER CERTIFICATE OF RESIDENCE TAX YEAR MUST MATCH YEAR OF PAY DATE & MUST CONTAIN TAX ID) PER UNDERLYING HOLDER ORIGINAL FORM 29-13 ORIGINAL FORM 72-3 or 29-14 FOR EACH UNDERLYING HOLDER | <ol style="list-style-type: none"> YES – DTC PARTICIPANT YES – DTC PARTICIPANT ORIGINAL VALID FOR 3 YEARS FROM ISSUE DATE YES – BENEFICIAL OWNER OR DTC PARTICIPANT WITH POA YES – BENEFICIAL OWNER OR DTC PARTICIPANT WITH POA |
| | OIV / OPCIV CLASSIFIED AS A CORPORATION | REQUIREMENTS CURRENTLY UNDER REVIEW; WILL ADVISE UPON UPDATE FROM LOCAL AUTHORITIES | |
| | OIV / OPCIV THAT DOES NOT DISTRIBUTE ITS PROFIT TO ITS INVESTORS | REQUIREMENTS CURRENTLY UNDER REVIEW; WILL ADVISE UPON UPDATE FROM LOCAL AUTHORITIES | |

*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 | <p>OIV / OPCIV disclosure form:</p> <p>An original document is required and remains valid for a period of three years, provided that the underlying beneficiary information does not change</p> <p>NOTE: 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.</p> |
| ANNEX TO FORM 29-13 | <p>Additional disclosure for OIV's only:</p> <p>Additional disclosure information pertaining to each underlying beneficial owner in the OIV.</p> |
| FORM 29-2 | Exemption form for World Exempt Entities. |
| FORM 72-5A & 72-5B | <p>Disclosure forms for OIVs and OPCIVs classified as a corporation and/or considered the beneficial owner:</p> <p>An original document is required and remains valid for a period of three years, provided that the underlying beneficiary information does not change.</p> |
| 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 |



powered by **GLOBETAX**

Citibank 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 and creates applicable documentation on the Participants behalf. Submit the data online through the web site below, print out the document on letterhead, sign, and mail to Citibank / GlobeTax.

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

<https://ESP.GlobeTax.com>

Please contact support@globetax.com or 212-747-9100 if you have any questions about this process.

FREQUENTLY ASKED QUESTIONS (FAQs)

| | |
|------------------------------------------------------------------------------------------------------------------------------|---------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| 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? | A copy of supporting documentation & form 29-2 (1) must accompany the 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? | <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> |
| What types of entities are considered OIVs under the intentions of the South 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 Citibank nor KSD will be able to validate these categorizations. |
| What types of entities are considered OPCIVs under the intentions of the South 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 Citibank nor KSD will be able to validate these categorizations. |
| How do we use ESP to disclose a beneficial owner as World Exempt? | Please select the ISO code 'OO' on the ESP dropdown menu to report a beneficial owner as a world exempt entity. |
| Can I be asked to submit additional documentation? | Yes, the South Korean Authorities maintain the right to request additional documentation as they see fit. |

WARNING AND DISCLAIMER:

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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.*

| APPENDIX A – COVER LETTER ***For Non-ESP Users ONLY | APPENDIX A – EXCEL BREAKDOWN ***For Non-ESP Users ONLY | FORM 29-13 |
|------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|------------------------------------------------------------------------------------------------------------------|
|  Appendix A Cover Letter.pdf |  Appendix A Breakdown.xlsx |  FORM 29-13.pdf |
| FORM 29-2 | FORMS 72-5A & 72-5B | LONG FORM DOCUMENTS |
|  FORM 29-2.pdf |  FORM 72-5.pdf |  LONG FORM DOCUMENTS.pdf |