



Important Notice
The Depository Trust Company

B #:	13090-20
Date:	April 20, 2020
To:	All Participants
Category:	Dividends
From:	International Services
Attention:	Operations, Reorg & Dividend Managers, Partners & Cashiers
Subject:	<u>REVISED NOTICE FOR</u> <u>Orange Box - 6166 validity</u> <u>Tax Relief</u> – Country: FRANCE THALES CUSIP: 883219206 <u>Record Date: 05/13/2020 Payable Date: 05/29/2020</u> <u>CA Web Instruction Deadline : 05/20/2020 8:00 P.M. (ET)</u> <u>Documentation Deadline: 05/21/2020 5:00 P.M. (ET)</u>

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.

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.

Non-Confidential





THALES UNSPON has announced a cash dividend and **JPMorgan Chase Bank, N.A.** acts as one of the Depositories for the Depository Receipt (“DR”) program.

A participant can use DTC’s Corporate Actions Web (“CA Web”) instructions tab to certify that all or a portion of his/her position is subject to the applicable withholding tax rate. Use of these instruction methods will permit entitlement amounts to be paid through DTC. By making submissions of such certification, the submitter represents and warrants that it has the required authority to make; that the party for which the submission is made is eligible therefore, and that the submitter will indemnify, as applicable, Globe Tax Services, Inc., the relevant Depository custodian, and any other person acting, directly or indirectly, in reliance thereon, including for any loss, liability or expense which may arise in connection with any such representation and submission, including for any inaccuracy therein.

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 French statutory withholding tax rate of **28%** with the possibility to reclaim through the standard long form process.

Table of Contents

FEES & DEADLINES	2
ELIGIBILITY MATRIX – RELIEF AT SOURCE	3
DESCRIPTION OF VARIOUS DOCUMENTATION	4
CONTACT DETAILS	4
FREQUENTLY ASKED QUESTIONS (FAQs)	5
RELIEF AT SOURCE QUESTIONS	5
GENERAL QUESTIONS	5
LONG FORM PROCESS QUESTIONS	6
FORMS AND ATTACHMENTS	6

DIVIDEND EVENT DETAILS	
COUNTRY OF ISSUANCE	FRANCE
ISSUE	THALES UNSPON
CUSIP#	883219206
UNDERLYING ISIN	FR0000121329
DEPOSITARY	MULTIPLE
DR RECORD DATE	MAY 13, 2020
ORD PAY DATE	MAY 14, 2020
DR PAY DATE	MAY 29, 2020
RATIO (DR to ORD)	5:1
ORD RATE	EUR 2.05
STATUTORY WITHHOLDING RATE	28%
	DOUBLE CLICK ICON BELOW TO DOWNLOAD: 

PLEASE NOTE:

- **FOR THIS EVENT, 2019 6166s/8802s WILL BE ACCEPTED AT THE TIME OF SUBMISSION, CONTINGENT THAT 2020 FORMS ARE SENT TO GLOBETAX NO LATER THAN JUNE 15, 2020 TO AVOID A CHARGEBACK**
- **ALL 6166s SUBMITTED MUST BE DATED PRIOR TO THE ORD PAY DATE**
- **U.S. MUTUAL FUNDS THAT WISH TO RECEIVE THE FAVORABLE RATE MUST PROVIDE A COPY OF THEIR 8802 WITH THE ORIGINAL SUBMISSION.**
- **IRAs ARE NOT ELIGIBLE FOR RELIEF AT SOURCE OR LONG FORM UNLESS 6166 REFERS TO 401(a), 401(b) OR 457.**

FEES & DEADLINES

FILING METHOD	PAYMENT METHOD	SHARE MINIMUM (DRs)	CUSTODIAL FEE	TAX RELIEF FEE	MINIMUM FEE PER BENEFICIAL OWNER	FINAL SUBMISSION DEADLINE
RELIEF AT SOURCE	DTCC	NO MINIMUM	NO FEE	UP TO \$0.008 PER DR	\$0	<u>CA WEB INSTRUCTIONS DEADLINE:</u> MAY 20, 2020 8:00 P.M. ET <u>DOCUMENTATION DEADLINE AT GLOBETAX:</u> MAY 21, 2020 5:00 P.M. ET
LONG FORM	CHECK OR ACH	NO MINIMUM	50 EUR	UP TO \$0.008 PER DR	\$25.00	OCTOBER 1, 2022 RECLAIMS RECEIVED POST DEADLINE CANNOT BE ASSURED AND MAY BE SUBJECT TO A 1,000.00 EUR PER BENEFICIARY CUSTODIAL FEE WHETHER OR NOT SUCCESSFUL

Representations and Indemnification from Participants and Beneficial Owners

We certify that to the best of our knowledge that each of the beneficial owners identified above are eligible for the preferential rates as stated herein and we declare that we have performed all the necessary due diligence to satisfy ourselves as to the accuracy of the information submitted to us by these beneficial owners.

We will be fully liable for any and all withholding taxes, claims, penalties and / or interest, including without limitation, any foreign exchange fluctuations associated with such funds. Neither BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank nor the Issuer nor any of their agents or affiliates shall be liable for the failure to secure any refund. In consideration of the assistance of BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank and the Issuer in processing such claims, we expressly agree that neither BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank nor the Issuer nor any of their agents or affiliates shall have any liability for, and we shall indemnify, defend and hold each of BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank and the Issuer and their respective agents and affiliates harmless from and against, any and all loss, liability, damage, judgment, settlement, fine, penalty, demand, claim, cost or expense (including without limitation fees and expenses of defending itself or enforcing this agreement) arising out of or in connection herewith. We further agree that our obligations hereunder shall be free from all defenses.


ELIGIBILITY MATRIX – RELIEF AT SOURCE

RATE DESCRIPTION	RECLAIM RATE	ELIGIBLE RESIDENTS	DOCUMENTATION REQUIRED	SIGNATURE REQUIRED
UNFAVORABLE 28%	0%	NON-TREATY COUNTRIES AND ENTITIES NOT MENTIONED AS FAVORABLE OR EXEMPT BELOW	NONE	NONE
FAVORABLE 15%	13%	U.S. CORPORATIONS*	1. APPENDIX B.1 2. APPENDIX B.2 3. APPENDIX C1 OR C2 4. APPENDIX F	1. N/A 2. N/A 3. YES – DTC PARTICIPANT 4. N/A
		U.S. PENSION FUNDS (UNDER SECTIONS 401(a), 401(b), 403(b), & 457 ONLY) U.S. NOT-FOR-PROFIT ORGANIZATIONS (UNDER SECTION 501(c)(3) ONLY) U.S. IRAs (UNDER SECTIONS 401(a), 401(b) & 457; EXCLUDING ROTH & ROLLOVER) U.S. GOVERNMENT ENTITIES	1. APPENDIX B.1 2. APPENDIX B.2 3. APPENDIX C1 OR C2 4. APPENDIX F 5. IRS FORM 6166	1. N/A 2. N/A 3. YES – DTC PARTICIPANT 4. N/A 5. N/A
		U.S. REGULATED INVESTMENT COMPANIES (RICs) REAL ESTATE INVESTMENT TRUSTS (REITs) REAL ESTATE MORTGAGE INVESTMENT CONDUITS (REMICs)	1. APPENDIX B.1 2. APPENDIX B.2 3. APPENDIX C1 OR C2 4. APPENDIX F 5. IRS FORM 6166 6. IRS FORM 8802	1. N/A 2. N/A 3. YES – DTC PARTICIPANT 4. N/A 5. N/A 6. N/A
		CANADIAN CORPORATIONS	1. APPENDIX B.1 2. APPENDIX B.2 3. APPENDIX D1 OR D2 4. 5000 – EN FORM	1. N/A 2. N/A 3. YES – DTC PARTICIPANT 4. YES – DTC PARTICIPANT
		U.S. INDIVIDUALS*	1. APPENDIX B.1 2. APPENDIX B.2 3. APPENDIX C2 4. APPENDIX F	1. N/A 2. N/A 3. YES – DTC PARTICIPANT 4. N/A
REDUCED STATUTORY RATE 12.8%	15.2%	NON-RESIDENT INDIVIDUALS (EXCLUDING U.S.)	1. APPENDIX B.1 2. APPENDIX B.2 3. APPENDIX D2 4. APPENDIX F 5. 5000 – EN FORM	1. N/A 2. N/A 3. YES – DTC PARTICIPANT 4. N/A 5. YES – DTC PARTICIPANT
		CANADIAN PENSIONS	1. APPENDIX B.1 2. APPENDIX B.3 3. APPENDIX D1 OR D2 4. APPENDIX E1 OR E2 5. APPENDIX F 6. 5000 – EN FORM	1. N/A 2. N/A 3. YES – DTC PARTICIPANT 4. YES – BO 5. N/A 6. YES – DTC PARTICIPANT
EXEMPT 0%	28%	CANADIAN PENSIONS	1. APPENDIX B.1 2. APPENDIX B.3 3. APPENDIX D1 OR D2 4. APPENDIX E1 OR E2 5. APPENDIX F 6. 5000 – EN FORM	1. N/A 2. N/A 3. YES – DTC PARTICIPANT 4. YES – BO 5. N/A 6. YES – DTC PARTICIPANT

Note: All documents listed in BLUE font are generated by GlobeTax's ESP website after submission of beneficial owner data
***An IRS 6166 form is not required for U.S. individuals and corporations, however, the French Tax Authorities reserve the right to request one**

DESCRIPTION OF VARIOUS DOCUMENTATION	
DOCUMENT NAME	DESCRIPTION
APPENDIX B.1	- DTC Participant Information
APPENDIX B.2	- Summary of all entity types elected
APPENDIX B.3	- Summary of all Canadian pensions elected
IRS FORM 6166	- Issued by the Internal revenue service, stating the name and taxpayer identification number of the beneficial owner - https://www.irs.gov/individuals/international-taxpayers/form-6166-certification-of-u-s-tax-residency
IRS FORM 8802	- Application for United States residency certification
APPENDIX C1 OR C2 (ANNEX III)	- Signature and stamp (medallion or other) of the DTC participant - Appendix C1 preferred
APPENDIX D1 OR D2 (ANNEX IV)	- Signature and stamp (medallion or other) of the DTC participant - Appendix D1 preferred
APPENDIX E1 OR E2 (ANNEX I OR II)	- An attestation must be filled for each beneficiary - Must be certified by the Canadian Revenue Agency - Appendix E1 preferred
5000-EN FORM	- Submit the "FOR USE BY THE FRENCH TAX AUTHORITY" version only; indicated in upper left-hand corner of the form - Section III Date, signature & stamp (medallion or other) of the DTC participant - Section IV To be certified by Canadian Revenue Agency - the form can be obtained below: - https://www.impots.gouv.fr/portail/files/formulaires/5000-sd/2017/5000-sd_1874.pdf
APPENDIX F	- An ASCII (American Standard Code for Information Interchange) computer disk file or a Microsoft Excel file is required for non-ESP users - Exhibit I lists the formatting rules

CONTACT DETAILS	
PRIMARY CONTACT	RENEE HEERALALL
DOMESTIC PHONE (U.S.)	800-929-5484
DOMESTIC FAX (U.S.)	800-929-9986
INTERNATIONAL PHONE	1-212-747-9100
INTERNATIONAL FAX	1-212-747-0029
GROUP EMAIL	FRANCEESP@GLOBETAX.COM
COMPANY	GLOBETAX SERVICES INC.
STREET ADDRESS	ONE NEW YORK PLAZA, 34 TH FLOOR
CITY/STATE/ZIP	NEW YORK, NY 10004
ADDITIONAL CONTACTS	CHRISTOPHER BUDNICKI



powered by **GLOBETAX**

BNY Mellon, Citibank, N.A., Deutsche Bank Trust Company Americas, and JPMorgan Chase Bank, N.A. offer 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 website. (Requires a one-time registration)

<https://ESP.GlobeTax.com>

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

FREQUENTLY ASKED QUESTIONS (FAQs)





RELIEF AT SOURCE QUESTIONS

Who do I send the relief at source documentation to?	Everything is to be submitted to GlobeTax.
Does the IRS 6166 form have to be for the Ordinary year in which the dividend is paid out and must it be original?	Yes. All submitted 6166s must be for the Ordinary pay year and must be original.
What happens if I do not send in the documentation and/or submit a file whose share position totals more than my CA Web elections?	This will result in a chargeback for the number of shares not supported by the documentation. The favorable or exempt shares elected will be adjusted to your unfavorable position and result in a debit to your DTC participant account. Submitting share amounts exceeding your CA Web elections may result in a chargeback of the total election.
Why are Forms 8802 being requested for U.S. Regulated Investment Companies (RICs), Real Estate Investment Trusts REITs) and Real Estate Mortgage Investment Conduits (REMICs)?	The IRS 6166 form does not differentiate between corporations and Regulated Investment Companies (RICs), Real Estate Investment Trusts REITs) and Real Estate Mortgage Investment Conduits (REMICs). In order for the French Tax Authorities to validate entities, these forms are being requested.
Are Canadian mutual funds eligible for reclaim through the relief at source process?	No. Only through the standard long form process.
Are partnerships/LLCs eligible for reclaim the relief at source process?	No. Only through the standard long form process.
Why would the French Tax Authorities request an IRS 6166 form for individuals or corporations if it is not required?	If they have any doubts regarding the status of the beneficial owner, they are entitled to validate their suspicion by requesting the 6166.
How long does it take to receive payment with the relief at source process?	On DR pay date.
Are U.S. trust accounts eligible for the relief at source process?	No. Only through the standard long form process
What happens if I do not send in the documentation and/or submit a file whose share position totals more than my CA Web elections?	This will result in a chargeback for the number of shares not supported by the documentation. The favorable or exempt shares elected will be adjusted to your unfavorable position and result in a debit to your DTC participant account. Submitting share amounts exceeding your CA Web elections will result in a chargeback of the total election
Do U.S. individuals have to provide a 6166 in order to qualify for a new 12.8%?	No. However, the French Tax Authorities reserve the right to request one.
What if I fail to provide a COR or a Certified form 5000 to support elections for the reduced statutory rate (12.8%)?	All shares elected at the statutory rate 12.8% will be moved to the unfavorable 28% tax bracket without the required supporting documentation.

GENERAL QUESTIONS

How long do beneficial owners have to file for reclaim on this dividend?	Generally, two years from the end of the year in which the ordinary dividend was paid, however it may depend on the residency of the beneficial owner.
Is there any way to reclaim the funds I was charged back for?	Yes. The standard long form process. Please refer to the depository contact details section of this notice for assistance.
Is this dividend available on ESP powered by GlobeTax?	Yes, all required documents can be created using ESP powered by GlobeTax but they must still be forwarded to GlobeTax.

Will GlobeTax accept claims filed directly to them by beneficial owners?	GlobeTax only accepts claims filed by the DTC participant who was holding the securities through DTC and only to the extent that DTC has reported these holdings to us as valid record date holdings. Beneficial owners are required to file their claims through the custody chain to the DTC participant of record. All claims not received directly from the DTC participant will be returned to the beneficial owner.
LONG FORM PROCESS QUESTIONS	
Where can I obtain information on the standard long form process?	GlobeTax administers the long form process. Please refer to the Depository contact details section of this notice for assistance.
When do I need to use Exhibit II (cover letter) at the end of this notice?	Only for the standard long form process & if you are not submitting via ESP.
Does form 5000 has to be sign, stamped and dated?	Yes , Box III on the form 5000 has to be signed, stamped and contain the date & place.
When do I have to stamp Box VI of the form 5000?	Box VI has to be stamped when the 6166/COR is not provided with the claim submission.

FORMS AND ATTACHMENTS			
<i>*Double click on respective icon to view attachment.</i>			
APPENDIX B, C, D, & E <i>**For Non-ESP users ONLY</i>	APPENDIX F <i>**For Non-ESP users ONLY</i>	EXHIBIT I <i>**For Non-ESP users ONLY</i>	EXHIBIT II <i>**For Non-ESP users ONLY</i>
 APPENDICES.pdf	 APPENDIX F.xlsx	 EXHIBIT I.pdf	 EXHIBIT II.pdf

Warning and Disclaimer:
 The information and data contained in this Notice is based on information obtained from multiple sources believed to be reliable. However, JPMorgan Chase Bank, 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.