



Important Notice
The Depository Trust Company

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| B #: | 13974-20 |
| Date: | September 25, 2020 |
| To: | All Participants |
| Category: | Tax Relief, Distributions |
| From: | International Services |
| Attention: | Operations, Reorg & Dividend Managers, Partners & Cashiers |
| Subject: | Tax Relief - Country: NETHERLANDS/IRELAND Security: AERCAP CUSIP: 00774YAA7 Record Date: 10/01/2020 Payable Date: 10/13/2020 Relief at Source Deadline: 10/07/2020 8:00 PM ET |

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.




AERCAP has announced an interest payment. BNY Mellon acts as the Qualifying Intermediary (the “QI”) for this program.

Participants may use DTC’s Corporate Actions Web (“CA Web”) instructions tab to certify all or a portion of their position entitled to each applicable withholding tax rate. Use of this instruction method will permit entitlement amounts to be paid through DTC. By making submissions of such certifications the submitter warrants that it has the required authority to make them, that the party for which the submission is made is eligible therefor, and will indemnify, as applicable, Globe Tax Services, Inc., the applicable depository, the applicable custodian, and other acting, directly or indirectly, in reliance thereon, including for any inaccuracy therein. By electing, Participants agree to the **Agreements, Fees, Representations and Indemnification from Participants and Beneficial Owners** below.

All supporting documentation for exempt and favorable elections must be provided to GlobeTax as agent for BNY Mellon by the applicable deadline stated below.

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| DIVIDEND EVENT DETAILS | |
|---|-----------------------|
| COUNTRY OF ISSUANCE | IRELAND / NETHERLANDS |
| ISSUE | AERCAP |
| CUSIP# | 00774YAA7 |
| UNDERLYING ISIN | US00774YAA73 |
| QUALIFYING INTERMEDIARY | BNY MELLON |
| RECORD DATE | OCTOBER 1, 2020 |
| PAY DATE | OCTOBER 13, 2020 |
| INTEREST RATE | 5.875% |
| COUPON PAYMENT / \$1,000 UNIT OF FACE VALUE | \$29.375 |
| STATUTORY WITHHOLDING RATE | 40% |
|  | NOT AVAILABLE |

Note: This is a unique event that combines both the Dutch (15%) and Irish (25%) withholding tax for a total withholding tax of 40%. Please review the eligibility matrix below for details on how to reclaim both the Dutch and Irish withholding tax.

By participating in the DTC CA Web process, Participants agree to comply with all audit requests made by the Irish Revenue Commissioners within twenty-one days.

The statutory withholding rate for all Irish events has increased from 20% to 25% effective January 1st, 2020. The terms for dividend withholding tax exemption outlined throughout this notice apply to the current dividend with a record date of October 1, 2020. Future dividends may be subject to different requirements that will be outlined in subsequent important notices.

FEES & DEADLINES

| FILING METHOD | BATCH | PAYMENT METHOD | SHARE MINIMUM | CUSTODIAL FEE | TAX RELIEF FEE | MINIMUM FEE PER BENEFICIAL OWNER | FINAL SUBMISSION DEADLINE (ESP) |
|------------------|------------------------------|----------------|---------------|---------------|------------------------|----------------------------------|----------------------------------|
| RELIEF AT SOURCE | PAYMENT ON PAY DATE | DTC | NO MINIMUM | NO FEE | NO FEE | \$0 | OCTOBER 7, 2020 8:00 P.M. ET |
| QUICK REFUND | 2-4 WEEKS POST DEADLINE | CHECK OR ACH | NO MINIMUM | NO FEE | NO FEE | \$0 | OCTOBER 27, 2020 5:00 P.M. ET |
| LONG FORM | POST-CA WEB PROCESS; ONGOING | CHECK OR ACH | NO MINIMUM | NO FEE | UP TO \$0.01 PER SHARE | \$25.00 | DECEMBER 1, 2024 |

Agreements, Fees, Representations and Indemnification from Participants and Beneficial Owners

This tax relief assistance service is wholly voluntary and discretionary, and outside the terms and conditions of any applicable deposit agreement. BNY Mellon undertakes no duty or obligation to provide this service, and may reject or decline any or all proposed electing participants or holders in its sole discretion. We hereby accept and agree to pay the fees of BNY Mellon of up to \$0.01 per share for standard Long Form tax reclaim (with a minimum of \$25.00), and any other charges, fees or expenses payable by or due to BNY Mellon or its agents, including any custodian, in connection with the tax reclaim process, or to tax authorities or regulators (which fees, charges or expenses may be deducted from the dividend or any other distribution or by billing or otherwise in BNY Mellon's discretion). We hereby agree that any such fees, charges or expenses may be due and payable whether or not a successful reduction in rate or reclamation is obtained. We hereby acknowledge that fees paid to BNY Mellon may be shared with its agents and affiliates.

We hereby agree in addition to statutory and documentation requirements, and the deduction of fees, tax relief benefits will be subject to review and approval, and potential audits by the applicable custodian and applicable tax regulators, and that BNY Mellon is not providing any legal, tax, accounting or other professional advice on these matters and has expressly disclaimed any liability whatsoever for any loss howsoever arising from or in reliance hereto. Participants and/or investors should seek advice based upon their own particular circumstances from an independent tax advisor.

We certify to the best of our knowledge that each of the beneficial owners identified are eligible for the preferential rates as stated 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. Furthermore, in the event of an audit we agree to provide any and all documentation required by the respective Tax Authority.

We will be fully liable for any and all claims, penalties and / or interest, including without limitation, any foreign exchange fluctuations associated therewith. BNY Mellon shall not be liable for the failure to secure any tax relief. We expressly agree that BNY Mellon and its agents or affiliates shall not have any liability for, and we shall indemnify, defend and hold each of BNY Mellon and its 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.

ELIGIBILITY MATRIX – RELIEF AT SOURCE / QUICK REFUND

| RATE DESCRIPTION | RECLAIM RATE | ELIGIBLE RESIDENTS | DOCUMENTATION REQUIRED | SIGNATURE REQUIRED |
|--------------------------------|--------------|---|--|---|
| EXEMPT – 0% WITHHOLDING | 40% | RESIDENTS OF THE U.S. WITH A VERIFIED U.S. ADDRESS | 1. U.S. TAX RESIDENT DECLARATION (APPENDIX B) | 1. YES – DTC PARTICIPANT |
| | | RESIDENTS OF RELEVANT TERRITORIES: ALBANIA, ARMENIA, AUSTRALIA, AUSTRIA, BAHRAIN, BELARUS, BELGIUM, BOSNIA & HERZEGOVINA, BOTSWANA, BULGARIA, CANADA, CHILE, CHINA, CROATIA, CYPRUS, CZECH REPUBLIC, DENMARK, EGYPT, ESTONIA, ETHIOPIA, FINLAND, FRANCE, GEORGIA, GERMANY, GHANA, GREECE, HONG KONG, HUNGARY, ICELAND, INDIA, ISRAEL, ITALY, JAPAN, KAZAKHSTAN, KOREA, REPUBLIC OF (SOUTH), KUWAIT, LATVIA, LITHUANIA, LUXEMBOURG, NORTH MACEDONIA, MALAYSIA, MALTA, MEXICO, MOLDOVA, MONTENEGRO, MOROCCO, NETHERLANDS, NEW ZEALAND, NORWAY, PAKISTAN, PANAMA, POLAND, PORTUGAL, QATAR, ROMANIA, RUSSIA, SAUDI ARABIA, SERBIA, SINGAPORE, SLOVAK REPUBLIC, SLOVENIA, SOUTH AFRICA, SPAIN, SWEDEN, SWITZERLAND, THAILAND, TURKEY, UKRAINE, UNITED ARAB EMIRATES, UNITED KINGDOM, UZBEKISTAN, VIETNAM, ZAMBIA | 1. COVER LETTER 2. NON-RESIDENT V2 FORM | 1. YES – DTC PARTICIPANT 2. YES – BENEFICIAL OWNER |
| | | A COMPANY THAT IS RESIDENT OUTSIDE OF A RELEVANT TERRITORY BUT IS CONTROLLED BY A PERSON OR PERSONS THAT IS OR ARE RESIDENT IN A RELEVANT TERRITORY OR BY A COMPANY THAT IS SUBSTANTIALLY AND REGULARLY TRADED ON A RECOGNIZED STOCK EXCHANGE IN A RELEVANT TERRITORY | 1. COVER LETTER 2. NON-RESIDENT V2B FORM | 1. YES – DTC PARTICIPANT 2. YES – BENEFICIAL OWNER |
| | | IRISH RESIDENT COMPANIES, PENSION SCHEMES, QUALIFYING EMPLOYEE SHARE OWNERSHIP TRUSTS, COLLECTIVE INVESTMENT UNDERTAKINGS OR CHARITIES | 1. COVER LETTER 2. COMPOSITE RESIDENT V3 FORM | 1. YES – DTC PARTICIPANT 2. YES – BENEFICIAL OWNER |
| FAVORABLE – 15% | 25% | DUTCH RESIDENT WHO HAD A V2 ON FILE | 1. COVER LETTER 2. NON-RESIDENT V2 | 1. YES – DTC PARTICIPANT 2. YES – BENEFICIAL OWNER |
| FAVORABLE - 25% | 15% | DISCLOSED NON-DUTCH RESIDENTS WHO ARE ANY OF THE FOLLOWING: 1. NOT CERTIFIED AS U.S. OVER CA WEB OR BY U.S. TAX RESIDENT DECLARATIONS (APPENDIX B) 2. BASED IN A NON-RELEVANT TERRITORY 3. IRISH INDIVIDUALS | 1. COVER LETTER 2. ESP DISCLOSURE | 1. YES – DTC PARTICIPANT 2. N/A |
| UNFAVORABLE – 40% | 0% | UNDISCLOSED NON-US RESIDENT OR THOSE WHO TAKE NO ACTION | NONE | N/A |

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

Warning and Disclaimer:

BNY Mellon will not be responsible for the truth or accuracy of any submissions received by it and all Participants and holders, whether or not following the procedures set forth herein or otherwise submitting any information, agree to indemnify and hold harmless BNY Mellon and its agents for any and all losses, liabilities and fees (including reasonable fees and expenses of counsel) incurred by any of them in connection herewith or arising therefrom. BNY Mellon and its agents will be relying upon the truth and accuracy of any and all submissions received by them in connection with the tax relief process and shall hold all participants and DR holders liable and responsible for any losses incurred in connection therewith or arising there from. There is no guarantee that the applicable tax authorities will accept submissions for relief. Neither BNY Mellon nor its agents shall be responsible or liable to any holders of DRs in connection with any matters related to, arising from, or in connection with the tax relief process described herein. See also “**Agreements, Fees, Representations and Indemnification**” above.

All tax information contained in this Important Notice is based on a good faith compilation of information obtained and received from multiple sources. The information is subject to change. Actual deadlines frequently vary from the statutory deadlines because of local market conditions and advanced deadlines set by local agents. To mitigate risk it is strongly advised that DTC Participants file their claims as soon as possible as the depository and/or their agents will not be liable for claims filed less than six months before the specified deadline. In the event that local market rules, whether implemented by a local agent or a Tax Authority, conflict with the information provided in the important notice, either prior to or after publication, the local market rules will prevail.

ESP



BNY Mellon 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 website.

<https://ESP.GlobeTax.com>

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

CONTACT DETAILS

| | |
|----------------------------|--|
| PRIMARY CONTACT | JOE HANDS |
| PHONE NUMBER | 1-212-747-9100 |
| FAX NUMBER | 1-212-747-0029 |
| GROUP EMAIL | IRELANDESP@GLOBETAX.COM |
| COMPANY | GLOBETAX SERVICES INC. |
| STREET ADDRESS | ONE NEW YORK PLAZA - 34TH FLOOR |
| CITY/STATE/ZIP | NEW YORK, NY 10004 |
| ADDITIONAL CONTACTS | BROOKS ROBINSON |

ELIGIBILITY MATRIX – LONG FORM

| RATE DESCRIPTION | RECLAIM RATE | ELIGIBLE RESIDENTS | DOCUMENTATION REQUIRED | SIGNATURE REQUIRED |
|--|--------------|---|---|---|
| EXEMPT U.S. 0% | 25% | QUALIFYING U.S. ENTITIES WITH A VERIFIED U.S. ADDRESS (CLAIMED UNFAVORABLE THROUGH CA WEB) | <ol style="list-style-type: none"> 1. COVER LETTER 2. DTC PARTICIPANT POWER OF ATTORNEY 3. BENEFICIAL OWNER POWER OF ATTORNEY | <ol style="list-style-type: none"> 1. YES – DTC PARTICIPANT 2. YES – DTC PARTICIPANT 3. YES – FINAL BENEFICIAL OWNER |
| EXEMPT RESIDENTS OF RELEVANT TERRITORIES 0% | 25% | RESIDENTS OF RELEVANT TERRITORIES: ALBANIA, ARMENIA, AUSTRALIA, AUSTRIA, BAHRAIN, BELARUS, BELGIUM, BOSNIA & HERZEGOVINA, BOTSWANA, BULGARIA, CANADA, CHILE, CHINA, CROATIA, CYPRUS, CZECH REPUBLIC, DENMARK, EGYPT, ESTONIA, ETHIOPIA, FINLAND, FRANCE, GEORGIA, GERMANY, GHANA, GREECE, HONG KONG, HUNGARY, ICELAND, INDIA, ISRAEL, ITALY, JAPAN, KAZAKHSTAN, KOREA, REPUBLIC OF (SOUTH), KUWAIT, LATVIA, LITHUANIA, LUXEMBOURG, NORTH MACEDONIA, MALAYSIA, MALTA, MEXICO, MOLDOVA, MONTENEGRO, MOROCCO, NETHERLANDS, NEW ZEALAND, NORWAY, PAKISTAN, PANAMA, POLAND, PORTUGAL, QATAR, ROMANIA, RUSSIA, SAUDI ARABIA, SERBIA, SINGAPORE, SLOVAK REPUBLIC, SLOVENIA, SOUTH AFRICA, SPAIN, SWEDEN, SWITZERLAND, THAILAND, TURKEY, UKRAINE, UNITED ARAB EMIRATES, UNITED KINGDOM, UZBEKISTAN, VIETNAM, ZAMBIA | <ol style="list-style-type: none"> 1. COVER LETTER 2. DTC PARTICIPANT POWER OF ATTORNEY 3. DIVIDEND WITHHOLDING TAX REFUND CLAIM FORM 4. NON-RESIDENT V2 FORM 5. BENEFICIAL OWNER POWER OF ATTORNEY | <ol style="list-style-type: none"> 1. YES – DTC PARTICIPANT 2. YES – DTC PARTICIPANT 3. YES – DTC PARTICIPANT OR FINAL BENEFICIAL OWNER 4. YES – DTC PARTICIPANT OR FINAL BENEFICIAL OWNER 5. YES – FINAL BENEFICIAL OWNER |
| OTHER ELIGIBLE ENTITIES 0% | 25% | A COMPANY THAT IS RESIDENT OUTSIDE OF A RELEVANT TERRITORY BUT IS CONTROLLED BY A PERSON OR PERSONS THAT IS OR ARE RESIDENT IN A RELEVANT TERRITORY OR BY A COMPANY THAT IS SUBSTANTIALLY AND REGULARLY TRADED ON A RECOGNIZED STOCK EXCHANGE IN A RELEVANT TERRITORY | <ol style="list-style-type: none"> 1. COVER LETTER 2. DTC PARTICIPANT POWER OF ATTORNEY 3. DIVIDEND WITHHOLDING TAX REFUND CLAIM FORM 4. NON-RESIDENT V2B FORM 5. BENEFICIAL OWNER POWER OF ATTORNEY | <ol style="list-style-type: none"> 1. YES – DTC PARTICIPANT 2. YES – DTC PARTICIPANT 3. YES – DTC PARTICIPANT OR FINAL BENEFICIAL OWNER 4. YES – DTC PARTICIPANT OR FINAL BENEFICIAL OWNER 5. YES – FINAL BENEFICIAL OWNER |
| EXEMPT ELIGIBLE IRISH ENTITIES 0% | 25% | IRISH RESIDENT COMPANIES, PENSION SCHEMES, QUALIFYING EMPLOYEE SHARE OWNERSHIP TRUSTS, COLLECTIVE INVESTMENT UNDERTAKINGS OR CHARITIES | <ol style="list-style-type: none"> 1. COVER LETTER 2. DTC PARTICIPANT POWER OF ATTORNEY 3. COMPOSITE RESIDENT V3 FORM 4. BENEFICIAL OWNER POWER OF ATTORNEY | <ol style="list-style-type: none"> 1. YES – DTC PARTICIPANT 2. YES – DTC PARTICIPANT 3. YES – DTC PARTICIPANT OR FINAL BENEFICIAL OWNER 4. YES – FINAL BENEFICIAL OWNER |

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 | ORIGINAL / COPY |
| COVER LETTER (APPENDIX A) | Cover letter required for all At-Source claims. | ORIGINAL |
| EXEMPT U.S. TAX RESIDENT DECLARATION (APPENDIX B) | Declaration letter for undisclosed U.S. tax residents to benefit from exemption | ORIGINAL |
| DIVIDEND WITHHOLDING TAX REFUND CLAIM FORM | Claim for repayment of Irish tax on dividends form. This form needs to be certified by the beneficial owner's local tax office for non-U.S. entities. | ORIGINAL |
| NON-RESIDENT V2 FORM (V2A, V2B, V2C) | Irish dividend withholding tax exemption declaration form for non-U.S. relevant territory beneficial owners. This form needs to be certified by the beneficial owner's local tax office for non-U.S. entities. | ORIGINAL |
| COMPOSITE RESIDENT V3 FORM | Irish dividend withholding tax exemption declaration form for eligible Irish beneficial owners. | ORIGINAL |
| BENEFICIAL OWNER POWER OF ATTORNEY | A document issued by the beneficial owner to the DTC Participant if the Participant is signing the Dividend Withholding Tax Refund Claim Form or Non-Resident V2 form on behalf of the beneficial owner. This document must be on the beneficial owner's letterhead. | COPY |
| DTC PARTICIPANT POWER OF ATTORNEY | A document issued by the DTC Participant to the Transfer Agent authorizing the Transfer Agent to file the long form reclaim and receive payment on the Participant's behalf. This document must be on the DTC Participant's letterhead. | ORIGINAL |
| EXCEL SPREADSHEET | Beneficial Owner breakdown to be included with submissions exceeding five beneficial owners. | COPY |
| ELIGIBILITY MATRIX | Description/Clarification of eligibility for varies investor types and special circumstances. | N/A |

IRISH FREQUENTLY ASKED QUESTIONS (FAQs)


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| What is the difference between the V2 forms A, B, and C and which one needs to be completed? | The V2 forms A, B, and C each pertain to different types of beneficial owners and should be selected based on the final beneficiary. Qualifying non-resident individuals must use the V2A, qualifying non-resident companies must use the V2B, and all other qualifying non-resident persons (not being an individual or a company) must use the V2C. |
| Can non-U.S. financial institutions benefit from Relief At-Source for their underlying holders? | To be eligible to reclaim through Relief At Source or Quick Refund all institutions involved in the payment between DTC and the final beneficial owner (not including the final BO) must be an Irish Qualified Intermediary (QI) or domiciled in the United States. If one of more of the institutions are not an Irish QI and are outside of the U.S., exemption cannot be applied At Source or through Quick Refund. For example, if the DTC participant is a Canadian Bank without Irish QI status they cannot participate in Relief At Source or Quick Refund. However, the beneficial owner may still be eligible to reclaim through the long form process - requirements described above. |
| Can I submit a trust agreement in lieu of a POA signed by the beneficial owner? | Yes, but a limited POA signed by the participant must be accompanied by the trust agreement. |
| How long does it take for long-form claims to be paid? | We estimate it takes 4 months for long form claims to be paid. |
| Does the long-form process have a minimum position requirement per beneficial owner? | No, however, there is a minimum fee of \$25 per beneficial owner which may be waived on an exceptional basis for clients reclaiming less than \$50. In such instances a fee of 50% of the reclaimed amount will be applied. |
| What is the statute of limitations for filing Irish reclaims? | It is 4 years from the end of the year in which the dividend is paid. Claims received after our submission deadline will be filed in good faith. |
| What happens if the participant does not make a CA web election within the specified CA web election window? | All shares will be withheld at the S25% tax rate. You will have an opportunity to file long form if the shares are withheld. |
| 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. |

DUTCH FREQUENTLY ASKED QUESTIONS (FAQs)

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| Can residents of The Netherlands achieve exemption? | No. Residents of The Netherlands will be subject to at least 15% Dutch withholding tax; however, they are still encouraged to provide the required V2 form to avoid the higher 25% Irish withholding tax. Please note that Dutch shareholders may have the potential to reclaim the Dutch tax on their tax returns filed to the Dutch Tax Authorities. |
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FORMS AND ATTACHMENTS

**Double Click on respective icon to view*

| APPENDIX A – AT-SOURCE COVER LETTER <i>**For Non-ESP users ONLY</i> | APPENDIX B – EXEMPT U.S. RESIDENT DECLARATION | EXCEL BREAKDOWN <i>**For Non-ESP users ONLY</i> | ELIGIBILITY MATRIX – INVESTOR TYPE |
|---|---|--|---|
|  Appendix A.pdf |  Appendix B - U.S. resident declaration |  Microsoft Excel Worksheet |  Eligibility Matrix.pdf |