



Important Notice
The Depository Trust Company

B #:	13923-20
Date:	September 28, 2020
To:	All Participants
Category:	Tax Relief, Distributions
From:	International Services
Attention:	Operations, Reorg & Dividend Managers, Partners & Cashiers
Subject:	<u>Tax Relief</u> – Country: JAPAN <u>Depository for Un-sponsored DR Program:</u> BNYM <u>Securities:</u> See Below <u>CUSIP(s):</u> Please refer to Dividend Event Matrix for list of CUSIPs <u>Record Date:</u> 09/29/2020 <u>Payable Date:</u> TBD <u>CA Web Instruction Deadline:</u> 10/19/2020 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 certify list ing 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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ISSUER	CUSIP	RECORD DATE
AIFUL CORPORATION	00873N103	09/29/20
ALFRESA HOLDINGS CORPORATION	015509102	09/29/20
BANDAI NAMCO HOLDINGS INC.	059831107	09/29/20
BROTHER INDS LTD	114813207	09/29/20
CAPCOM	13916V107	09/29/20
CONCORDIA FINANCIAL GROUP, LTD	206517104	09/29/20
DAIBIRU CORPORATION	233920107	09/29/20
DAIFUKU	233802107	09/29/20
DAI-ICHI LIFE INSURANCE	23380Y107	09/29/20
DISCO	25461D100	09/29/20
ENEOS HOLDINGS, INC.	29279T109	09/29/20
FIELDS CORPORATION	316575109	09/29/20
FUJITEC CO LTD	35958W107	09/29/20
FUKUOKA FINANCIAL	35959W106	09/29/20
FUNAI ELECTRIC CO LTD	36076N201	09/29/20
GLORY	37961P103	09/29/20
HACHIJUNI BANK LTD	404508202	09/29/20
HAKUHODO DY HOLDINGS INC	405328105	09/29/20
HAMAMATSU PHOTONICS K.K.	40652R107	09/29/20
HITACHI METALS	433584208	09/29/20
IHI CORP	44962U107	09/29/20
ITOCHE CORPORATION	465717106	09/29/20
ITOCHE TECHNO-SOLUTIONS	465720100	09/29/20
JAPAN AIRLINES	471038109	09/29/20
JAPAN STEEL WORKS LTD	471100305	09/29/20
JVC KENWOOD	46636X102	09/29/20
KOITO MANUFACTURING	500275102	09/29/20
MATSUI SECURITIES CO LTD	576875207	09/29/20
MEIJI HOLDINGS	585265101	09/29/20
mitsui E&S HOLDINGS CO., LTD.	606837102	09/29/20
MITSUI MINING AND SMELTING CO., LTD.	606844207	09/29/20
NABTESCO CORPORATION	62957T109	09/29/20
NGK SPARK PLUG CO., LTD.	62913J104	09/29/20
NIFCO INC	654101203	09/29/20

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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.

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NIHON KOHDEN	65412C108	09/29/20
NINTENDO	654445303	09/29/20
NIPPON KAYAKU	654573104	09/29/20
NIPPON SUISAN KAISHA LTD	654620202	09/29/20
NISSAN CHEMICAL INDUSTRIES LTD	65476F104	09/29/20
NITTO DENKO CORPORATION	654802206	09/29/20
ONO PHARMACEUTICAL	682736103	09/29/20
ORIENTAL LAND	68620X104	09/29/20
RINNAI CORPORATION	766882104	09/29/20
SANTEN PHARMACEUTICAL	80287P100	09/29/20
SHIBAURA MACHINE CO., LTD.	82444P106	09/29/20
SHIMIZU	82454Y104	09/29/20
SHIONOGI & CO	824667109	09/29/20
SOHGO SECURITY	83409K108	09/29/20
SUMITOMO METAL MINING	86563T104	09/29/20
SURUGA BANK LIMITED	869007203	09/29/20
SYSMEX CORP	87184P109	09/29/20
TAIHEIYO CEMENT CORPORATION	87401G106	09/29/20
TAISEI CORPORATION	874018203	09/29/20
TEIJIN LTD	879063204	09/29/20
TOSHIBA TEC	89153W107	09/29/20
UNITED ARROWS	90938Q100	09/29/20
YAKULT HONSHA	984541102	09/29/20
YOKOGAWA ELECTRIC	986008100	09/29/20
ZENKOKU HOSHO	989415104	09/29/20

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Japanese issuers have announced a cash dividend and **BNY Mellon** acts as one of the Depositories for the Depositary Receipt (“DR”) 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.

Japanese dividends with September 2020 Record Dates are outlined in the Dividend Event Matrix below.

NOTE: Please note that the Japanese Tax Office has the legal authority to audit claims filed for a period of seven years so it is the DTC Participant’s responsibility to ensure that your document retention policies for US withholding tax documentation are adequate to support potential audits from the Japanese Tax Office.

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 Japanese statutory withholding tax rate of 15.315% with the possibility to reclaim through the standard long form process.

FEES & DEADLINES

FILING METHOD	BATCH	PAYMENT METHOD	CUSTODIAL FEE	DSC FEE	MINIMUM FEE PER BENEFICIAL OWNER	FINAL SUBMISSION DEADLINE (ESP)
RELIEF AT SOURCE	PAYMENT ON PAY DATE	DTC	NO FEE	5%, 10%, 12.5%, 15% - UP TO \$0.005 PER DR	\$0	OCTOBER 19, 2020 8:00 P.M. EST
				0% - UP TO \$0.0075 PER DR		
LONG FORM	POST-CA WEB PROCESS; ONGOING	CHECK OR ACH	UP TO JPY 40,000	UP TO \$0.01 PER DR	\$25.00	SEPTEMBER 29, 2025

*The Fees are that of The Bank of New York Mellon as First Filer. Deadlines are set by GlobeTax Services, Inc.

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DIVIDEND EVENT MATRIX

ISSUE	CUSIP#	UNDERLYING ISIN	DR RECORD DATE	RATIO (DR to ORD)
AIFUL CORPORATION	00873N103	JP3105040004	9/29/2020	2:1
ALFRESA HOLDINGS CORPORATION	015509102	JP3126340003	9/29/2020	1:1
BANDAI NAMCO HOLDINGS INC.	059831107	JP3778630008	9/29/2020	2:1
BROTHER INDS LTD	114813207	JP3830000000	9/29/2020	1:2
CAPCOM	13916V107	JP3218900003	9/29/2020	2:1
CONCORDIA FINANCIAL GROUP, LTD	206517104	JP3305990008	9/29/2020	1:3
DAIBIRU CORPORATION	233920107	JP3497200000	9/29/2020	1:2
DAIFUKU	233802107	JP3497400006	9/29/2020	4:1
DAI-ICHI LIFE INSURANCE	23380Y107	JP3476480003	9/29/2020	1:1
DISCO	25461D100	JP3548600000	9/29/2020	5:1
ENEOS HOLDINGS, INC.	29279T109	JP3386450005	9/29/2020	1:2
FIELDS CORPORATION	316575109	JP3802680003	9/29/2020	1:1
FUJITEC CO LTD	35958W107	JP3818800009	9/29/2020	1:1
FUKUOKA FINANCIAL	35959W106	JP3805010000	9/29/2020	2:1
FUNAI ELECTRIC CO LTD	36076N201	JP3825850005	9/29/2020	5:1
GLORY	37961P103	JP3274400005	9/29/2020	1:1
HACHIJUNI BANK LTD	404508202	JP3769000005	9/29/2020	1:10
HAKUHODO DY HOLDINGS INC	405328105	JP3766550002	9/29/2020	1:2
HAMAMATSU PHOTONICS K.K.	40652R107	JP3771800004	9/29/2020	4:1
HITACHI METALS	433584208	JP3786200000	9/29/2020	1:10
IHI CORP	44962U107	JP3134800006	9/29/2020	4:1
ITOCHU CORPORATION	465717106	JP3143600009	9/29/2020	1:2
ITOCHU TECHNO-SOLUTIONS	465720100	JP3143900003	9/29/2020	2:1
JAPAN AIRLINES	471038109	JP3705200008	9/29/2020	2:1
JAPAN STEEL WORKS LTD	471100305	JP3721400004	9/29/2020	2:1
JVC KENWOOD	46636X102	JP3386410009	9/29/2020	1:4
KOITO MANUFACTURING	500275102	JP3284600008	9/29/2020	1:1
MATSUI SECURITIES CO LTD	576875207	JP3863800003	9/29/2020	1:2
MEIJI HOLDINGS	585265101	JP3918000005	9/29/2020	4:1
MITSUI E&S HOLDINGS CO., LTD.	606837102	JP3891600003	9/29/2020	1:1
MITSUI MINING AND SMELTING CO., LTD.	606844207	JP3888400003	9/29/2020	5:1
NABTESCO CORPORATION	62957T109	JP3651210001	9/29/2020	2:1
NGK SPARK PLUG CO., LTD.	62913J104	JP3738600000	9/29/2020	2:1
NIFCO INC	654101203	JP3756200006	9/29/2020	2:1
NIHON KOHDEN	65412C108	JP3706800004	9/29/2020	2:1
NINTENDO	654445303	JP3756600007	9/29/2020	8:1
NIPPON KAYAKU	654573104	JP3694400007	9/29/2020	1:1
NIPPON SUISAN KAISHA LTD	654620202	JP3718800000	9/29/2020	1:10
NISSAN CHEMICAL INDUSTRIES LTD	65476F104	JP3670800006	9/29/2020	1:1
NITTO DENKO CORPORATION	654802206	JP3684000007	9/29/2020	2:1

ONO PHARMACEUTICAL	682736103	JP3197600004	9/29/2020	3:1
ORIENTAL LAND	68620X104	JP3198900007	9/29/2020	5:1
RINNAI CORPORATION	766882104	JP3977400005	9/29/2020	5:1
SANTEN PHARMACEUTICAL	80287P100	JP3336000009	9/29/2020	1:1
SHIBAURA MACHINE CO., LTD.	82444P106	JP3592600005	9/29/2020	2:1
SHIMIZU	82454Y104	JP3358800005	9/29/2020	1:4
SHIONOGI & CO	824667109	JP3347200002	9/29/2020	4:1
SOHGO SECURITY	83409K108	JP3431900004	9/29/2020	1:1
SUMITOMO METAL MINING	86563T104	JP3402600005	9/29/2020	4:1
SURUGA BANK LIMITED	869007203	JP3411000007	9/29/2020	1:10
SYSMEX CORP	87184P109	JP3351100007	9/29/2020	2:1
TAIHEIYO CEMENT CORPORATION	87401G106	JP3449020001	9/29/2020	4:1
TAISEI CORPORATION	874018203	JP3443600006	9/29/2020	4:1
TEIJIN LTD	879063204	JP3544000007	9/29/2020	1:1
TOSHIBA TEC	89153W107	JP3594000006	9/29/2020	2:1
UNITED ARROWS	90938Q100	JP3949400000	9/29/2020	2:1
YAKULT HONSHA	984541102	JP3931600005	9/29/2020	2:1
YOKOGAWA ELECTRIC	986008100	JP3955000009	9/29/2020	1:2
ZENKOKU HOSHO	989415104	JP3429250008	9/29/2020	3:1

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

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, Citibank, N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank, N.A. 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, Citibank, N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank, N.A. of up to \$0.0075 per Depositary Receipt for Relief at Source, or up to \$0.01 per Depositary Receipt for Long Form (with a minimum of \$25) and any other charges, fees or expenses payable by or due to BNY Mellon, Citibank, N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank, N.A. 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, Citibank, N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank, N.A.'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, Citibank, N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank, N.A. may be shared with its agents and affiliates. We hereby confirm that we have the applicable Form W-9 or Form W-8 beneficial owner series (W-8BEN, W-BENE, W-8EXP, or W-8ECI) on file and agree to obtain and retain all underlying documentation required to support the tax relief benefits, including without limitation all IRS Forms W-9 and IRS Form W-8 for a period of at least seven years and to provide such documentation to you and/or the Japanese Tax Office upon your or the Japanese Tax Office's request.

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, Citibank, N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank, N.A. 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, Citibank, N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank, N.A. shall not be liable for the failure to secure any tax relief. We expressly agree that BNY Mellon, Citibank, N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank, N.A. and its agents or affiliates shall not 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, N.A. 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.

RELIEF AT SOURCE – ELIGIBILITY MATRIX

RATE DESCRIPTION	RECLAIM RATE	ELIGIBLE RESIDENTS		DOCUMENTATION REQUIRED
EXEMPT 0%	20.42%	PENSIONS RESIDENT IN:	AUSTRIA, BELGIUM, CHILE, DENMARK, ICELAND, NETHERLANDS, RUSSIA, SWITZERLAND, UNITED KINGDOM, UNITED STATES, WORLD EXEMPTS	<ol style="list-style-type: none"> APPENDIX A (TO BE KEPT ON FILE) IRS W-9 / IRS W-8BEN (TO BE KEPT ON FILE)
		ALL ENTITIES RESIDENT IN: <small>*Except Individuals</small>	LATVIA*, LITHUANIA*, ZAMBIA	
FAVORABLE 5%	15.42%	ALL ENTITIES RESIDENT IN:	CROATIA, ECUADOR, SLOVENIA	<ol style="list-style-type: none"> APPENDIX A (TO BE KEPT ON FILE) IRS W-9 / IRS W-8BEN (TO BE KEPT ON FILE)
FAVORABLE 10%	10.42%	ALL ENTITIES RESIDENT IN:	AUSTRALIA, AUSTRIA, BELGIUM, BRUNEI, CHINA, ESTONIA, FRANCE, HONG KONG, HUNGARY, INDIA, KUWAIT, NETHERLANDS, OMAN, PAKISTAN, POLAND, PORTUGAL, QATAR, ROMANIA, SAUDI ARABIA, SWEDEN, SWITZERLAND, TAIWAN, UNITED KINGDOM, UNITED STATES, VIETNAM	<ol style="list-style-type: none"> APPENDIX A (TO BE KEPT ON FILE) IRS W-9 / IRS W-8BEN (TO BE KEPT ON FILE)
		SELECT ENTITIES RESIDENT IN:	UNITED ARAB EMIRATES**	
		INDIVIDUAL RESIDENTS IN:	LATVIA, LITHUANIA	
FAVORABLE 12.5%	7.92%	ALL ENTITIES RESIDENT IN:	BRAZIL	<ol style="list-style-type: none"> APPENDIX A (TO BE KEPT ON FILE) IRS W-8BEN (TO BE KEPT ON FILE)
FAVORABLE 15%	5.42%	ALL ENTITIES RESIDENT IN:	ARMENIA, AZERBAIJAN, BANGLADESH, BELARUS, BULGARIA, CANADA, CHILE, CZECH REPUBLIC, DENMARK, EGYPT, FINLAND, GEORGIA, GERMANY, ICELAND, INDONESIA, IRELAND, ISRAEL, ITALY, KAZAKHSTAN, KOREA, REPUBLIC OF, KYRGYZSTAN, LUXEMBOURG, MALAYSIA, MEXICO, MOLDOVA, NEW ZEALAND, NORWAY, PHILIPPINES, RUSSIA SINGAPORE, SLOVAK REPUBLIC, SOUTH AFRICA, SPAIN, TAJIKISTAN, TURKEY, TURKMENISTAN, UKRAINE, UZBEKISTAN	<ol style="list-style-type: none"> APPENDIX A (TO BE KEPT ON FILE) IRS W-8BEN (TO BE KEPT ON FILE)
15.315%	5.105%	ALL BENEFICIARIES EXCEPT JAPANESE INDIVIDUAL RESIDENTS, LARGE SHAREHOLDERS, TREATY ELIGIBLE PENSIONS & TREATY ELIGIBLE HOLDERS.		NO DOCUMENTATION OR ESP SUBMISSION REQUIRED
20.315%	0.105%	JAPANESE INDIVIDUAL RESIDENTS		<ol style="list-style-type: none"> APPENDIX A (TO BE KEPT ON FILE)
UNFAVORABLE 20.42%	0%	LARGE SHAREHOLDERS THAT HOLD 3% OR MORE OF THE OUTSTANDING SHARES EXCLUDING FOREIGN/(JAPANESE) & DOMESTIC CORPORATE LARGE SHAREHOLDERS FOR DIVIDEND INCOME		<ol style="list-style-type: none"> APPENDIX A (TO BE KEPT ON FILE)

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

**Refer to FAQs section for list of select entities.

RELIEF AT SOURCE - INVESTOR TYPES

INVESTOR	RESIDENCY	TYPE	CONDITIONS	AUDIT DOCUMENTATION
INDIVIDUAL	U.S.	Certified person	A complete and valid U.S. address*	Form W-9
	NON-U.S.	Certified person	Resides in a jurisdiction that has a treaty with Japan and does not have a permanent address in Japan	Form W-8BEN
CORPORATION	U.S.	S-Corp/C-Corp	A complete and valid U.S. address*	Form W-9
		LLC	Disregarded entity, disregarded into a US Individual or other body of persons that are entitled to claim treaty benefits and elected to be treated as an S- or C-Corp that has a complete and valid US address	
	NON-U.S.	Certified Corp	Resides in a jurisdiction that has a treaty with Japan and does not have a permanent address in Japan	Form W-8BEN
TRUST	U.S.	Complex	Comprised of U.S. Individuals or other body of persons that are entitled to claim treaty benefits	Form W-9
		Grantor	Grantor is a U.S. Individual or other body of persons that are entitled to claim treaty benefits	
		Simple	Beneficiaries are U.S. or other body of persons that are entitled to claim treaty benefits	
RIC, REIT & REMIC	U.S.	N/A	A complete and valid U.S. address*	Form W-9, prospectus or any legal ancillary document
NON-PROFIT	U.S.	Charity, Foundation	Tax exempt organizations that meet 501(c) requirements	Form W-9 or any legal ancillary document
GOVERNMENT	U.S.	Government, state and any political subdivision or local authority	A complete and valid U.S. address*	Form W-9
PENSION	Please see Treaty Eligible Pensions Exhibit on Page 5			
TRANSPARENT ENTITY	U.S.	Partnership and similar vehicles	If underlying members of fiscally transparent entity are U.S. residents, then all of the interest income would be eligible for the benefits of the convention. Alternatively, the portion attributable to eligible U.S. residents would be eligible to claim treaty benefits	Form W -9

***NOTE:** The definition of a “Valid U.S. Address” is a U.S. address:

- that is not a PO Box
- that is not in a U.S. Territory of Protectorate State
- is supported by the Share of an IRS Form W9 prior to January 1 of the year in which the dividend payment occurred
- the IRS Form W9 has not been revoked by the resident due to change in tax residence
- the DTC Participant has no indication of a secondary residence and/or address in Japan

TREATY ELIGIBLE PENSIONS

COUNTRY OF PENSION FUND	DESCRIPTION	QUALIFYING PLANS
UNITED STATES	<p>APPLIES TO A BENEFICIAL OWNER OF THE DRs THAT:</p> <ol style="list-style-type: none"> 1) IS NOT ENGAGED IN A TRADE OR BUSINESS IN JAPAN THROUGH A PERMANENT ESTABLISHMENT SITUATED IN JAPAN, WITHIN THE MEANING OF THE U.S. DOUBLE TAXATION TREATY WITH JAPAN 2) IS A QUALIFYING “PENSION FUND” AS DEFINED ON PAGE 11 OF THE TECHNICAL EXPLANATION OF THE NEW TAX TREATY BETWEEN THE U.S. AND JAPAN, PUBLISHED BY THE U.S. DEPARTMENT OF TREASURY 3) IS ABLE TO CERTIFY THAT MORE THAN 50 % OF THE BENEFICIARIES, MEMBERS OR PARTICIPANTS OF THE ELIGIBLE PENSION FUND WERE INDIVIDUAL RESIDENTS OF THE U.S. OR JAPAN AS OF THE PRIOR TAXABLE PERIOD 	<ul style="list-style-type: none"> ✓ QUALIFIED PLANS UNDER SECTION 401(A) ✓ INDIVIDUAL RETIREMENT PLANS (INCLUDING THOSE THAT ARE A PART OF A SIMPLIFIED EMPLOYEE PENSION PLAN THAT SATISFIES 408(K)) ✓ INDIVIDUAL RETIREMENT ACCOUNTS, INDIVIDUAL RETIREMENT ANNUITIES, SECTION 408(P) ACCOUNTS ✓ ROTH IRAS UNDER SECTION 408 A ✓ SECTION 457 GOVERNMENTAL PLANS ✓ SECTION 403(A) QUALIFIED ANNUITY PLANS ✓ SECTION 403(B) PLANS ✓ SECTION 401(K) PLANS QUALIFY AS PENSION FUNDS BECAUSE A 401(K) PLAN IS A TYPE OF 401(A) PLAN. ✓ - ANY OTHER FUND IDENTICAL OR SUBSTANTIALLY SIMILAR TO THE FOREGOING SCHEMES THAT ARE ESTABLISHED PURSUANT TO LEGISLATION INTRODUCED AFTER THE DATE OF SIGNATURE OF THE CONVENTION.
NON-UNITED STATES	<p>APPLIES TO A BENEFICIAL OWNER OF THE DRs THAT:</p> <ol style="list-style-type: none"> 1) IS NOT ENGAGED IN A TRADE OR BUSINESS IN JAPAN THROUGH A PERMANENT ESTABLISHMENT SITUATED IN JAPAN, WITHIN THE MEANING OF THE DOUBLE TAXATION TREATY WITH JAPAN, 2) IS A QUALIFYING “PENSION FUND” AS DEFINED BY APPLICABLE ARTICLE OF THE INCOME TAX CONVENTION BETWEEN JAPAN AND NON-US TREATY COUNTRY, PUBLISHED BY THE MINISTRY OF FINANCE JAPAN 3) IS ABLE TO CERTIFY THAT MORE THAN 50 % OF THE BENEFICIARIES, MEMBERS OR PARTICIPANTS OF THE ELIGIBLE PENSION FUND WERE INDIVIDUAL RESIDENTS OF NON-US TREATY COUNTRY OR JAPAN AS OF THE PRIOR TAXABLE PERIOD. 	

*Note: For all additional Treaty Eligible Pensions please contact GlobeTax at JapanESP@globetax.com

ELIGIBILITY MATRIX – LONG FORM

ENTITY TYPE	ELIGIBLE RESIDENTS	DOCUMENTATION REQUIRED
NON-PENSIONS	ALL ELIGIBLE COUNTRIES ENTITLED TO FAVORABLE RATE. PLEASE SEE RELIEF AT-SOURCE MATRIX	<ol style="list-style-type: none"> 1. Appendix A (Cover Letter) 2. Summary of Claim 3. Pension Declaration Letter (Pensions Exempt Only) 4. Proof of Payment 5. 6166/ COR 6. Power of Attorney (POA) 7. Limited POA 8. Form 17 9. Prospectus (Charities Only) 10. Discrepancy Letter
PENSIONS	ALL ELIGIBLE COUNTRIES ENTITLED TO EXEMPT RATE. PLEASE SEE RELIEF AT-SOURCE MATRIX	

*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 and/or Japanese Individual residents generated by ESP.
IRS FORM W-9	https://www.irs.gov/uac/about-form-w9
IRS FORM W-8BEN	https://www.irs.gov/uac/form-w-8ben-certificate-of-foreign-status-of-beneficial-owner-for-united-states-tax-withholding
IRS FORM 6166	https://www.irs.gov/individuals/international-taxpayers/form-6166-certification-of-u-s-tax-residency
JAPAN FORM 17	Attachment Form for Limitation of Benefits article. *Additional documents (e.g. Prospectus, PR brochure, explanation letter) may be required to support Form 17 Certifications.
JAPAN FORM 16	List of underlying members or partners of transparent entity
APPENDIX B (POWER OF ATTORNEY)	Signed by Beneficial Owner appointing Depository on Beneficial Owner's letterhead
LIMITED POWER OF ATTORNEY	If the POA is signed by the Broker, a trust agreement or notarized limited POA must also be submitted
PROOF OF PAYMENT	Document certifying payment has been credited to the Pensions fund's account.

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 BNY Mellon and creates applicable documentation on the Participants behalf.

ESP is equipped with a bulk upload feature that allows for multiple relief at-source events to be submitted within a single upload. Please submit the data online through the website below, print the required documents on letterhead, sign, and mail to BNY Mellon / GlobeTax.

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

<https://ESP.GlobeTax.com>

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

CONTACT DETAILS	
PRIMARY CONTACT	CHRIS BUDNICKI
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	JAPANESP@GLOBETAX.COM
COMPANY	GLOBETAX SERVICES INC.
STREET ADDRESS	ONE NEW YORK PLAZA, 34 TH FLOOR
CITY/STATE/ZIP	NEW YORK, NY 10004
SECONDARY CONTACT	RENEE HEERALALL

FREQUENTLY ASKED QUESTIONS (FAQs)

AT SOURCE QUESTIONS

What information does the beneficiary need to disclose in order to receive favorable tax treatment?	Name, address, country of residence, and share position. A tax ID number is required only for U.S. residents.
Do shareholders requesting 15.315% withholding need to disclose information?	No, disclosure does not apply. Please refer to relief at-source eligibility matrix for documentation requirements.
Will holders wishing to benefit from favorable tax treatment need to furnish supporting documentation up front?	No, brokers must store W-9 and W-8BEN on file in case of an audit.
Does the Japanese law require a certification of residence (Form 6166) to participate in the reclaim process?	No. The law governing the processing of DRS does not require the presence or collection of a certification of residency (Form 6166) though participants may be required to prove the eligibility of the underlying investors. Upon review of the W-9 and W-8BEN forms the Japanese tax office agreed to accept these as proof of eligibility.
Will a certificate of residence (Form 6166) be requested during an audit?	The Japanese ministry of finance reserves the right to request any other documentation it may need to determine the eligibility of the investor. We have been advised that the Japanese tax office may request a certificate of residency in rare circumstances where the information provided is inconsistent and cannot be confirmed through the provision of other documents or explanations.
Who is considered a “large shareholder”?	Individual (non-corporate) investors who hold 3% or more of the number of outstanding shares for dividend income from listed shares, now fall under the "large shareholder" category. These "large shareholders" will no longer be eligible for the preferential tax rates and thus be applied the 20.42% tax rate for dividends paid after September 30, 2011. Participants are required to disclose the name and address of these "large shareholders" to the depository by the deadline stated within this notice. Corporate entities (both Japanese and non-Japanese) who hold 3% or more of the number of outstanding shares for dividend income from listed shares are still entitled to the preferential withholding rates and are eligible to receive the income with a 15.315% withholding rate applied or more if eligible based on the treaty between the investors country of residence and Japan. Dividend income for unlisted shares will continue to be withheld at the 20.42% Japanese national tax rate.
Which select entities resident in United Arab Emirates are eligible to receive a favorable rate?	<ul style="list-style-type: none"> ▪ Central Bank of the UAE ▪ Abu Dhabi Investment Authority ▪ Abu Dhabi Investment Council ▪ International Petroleum Investment Company ▪ Investment Corporation of Dubai ▪ Mubadala Development Company ▪ Eligible pension funds established in the UAE

LONG FORM QUESTIONS

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.
Are Form 6166s with IRS code ruling 81-100 accepted?	Yes, with a tax determination letter & pension declaration letter.
Does the beneficiary's name on the Form 6166 need to match the POA?	Yes, the beneficiary's name on both documents should be identical.
Does the long form process have a minimum position requirement per beneficial owner?	Yes, please call for more details.
What is the statute of limitations for filing Japanese reclaims?	It is 5 years from ordinary pay date. Claims received after our submission deadline will be filed in good faith.
What if the beneficial owner name and/or address is not consistent with the other documents?	Please send a letter on participant letterhead explaining the discrepancy and be sure to include the tax ID number.
How often are long form claims filed with the Japanese custodians?	Due to quarterly filing limitations GlobeTax files on February 20th, May 20th, August 20th & November 20th of each year.
Will the depository accept claims filed directly to them by beneficial owners?	The depository only accepts claims filed by the DTC participant who was holding 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.
Do pension plans need to disclose any underlying holder information for the long form process?	Yes, effective September 1, 2012 pension plans will need to disclose the total number of participants, the number of treaty eligible participants and the date of fiscal year end.
Is this long form process free of charge?	No. This tax reclaim assistance service is wholly voluntary and discretionary and outside the terms and conditions of any applicable deposit agreement. Fees will be charged for this assistance service of up to \$0.01 per depository receipt for standard long form reclaims with a minimum of \$25.00. Reclaims received post deadline cannot be assured and may be subject to a per beneficiary fee as well as other charges, fees or expenses payable by or due to BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank or its agents, including the custodian or tax authorities. In addition, charges may apply to any long form claims rejected or not accepted by the custodian. Fees paid to BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank may be shared with its agents.

Warning and Disclaimer:

BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank 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, Citibank N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank 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 herefrom. BNY Mellon, Citibank N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank 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, Citibank N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank 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.