



B #:	15908-21
Date:	October 15, 2021
To:	All Participants
Category:	Tax Relief, Distributions
From:	International Services
Attention:	Operations, Reorg & Dividend Managers, Partners & Cashiers
Subject:	<u>Tax Relief – Country:</u> RUSSIAN FEDERATION <u>Issue Name:</u> PJSC CHERKIZOVO GROUP - 144A <u>CUSIP:</u> 164145104 <u>Record Date:</u> 10/01/2021 <u>Payable Date:</u> TBD <u>CA Web Instruction Deadline:</u> 10/06/2021 8:00 PM ET <u>Quick Refund Instruction Deadline:</u> 11/15/2021 8:00 PM ET Revised - UPDATED QUICK REFUND DEADLINE

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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UPDATED QUICK REFUND DEADLINE: NOVEMBER 15, 2021

PJSC CHERKIZOVO GROUP - 144A has announced a dividend and BNY Mellon acts as Depository for the Depository 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 therefore, 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.

On DR Pay Date, holders **that disclose summary beneficial owner information may be eligible** to receive the applicable rate as per a relevant DTT or the 15% statutory withholding rate. All non-disclosed holders will receive this dividend net of a maximum 15% withholding rate; however, consequences of non-disclosure are unclear and Participants and holders will bear all risk and responsibility in relation thereto.

The summary disclosure requirements are country of tax residency, entity type by individual or ~~legal~~ and number of DRs held.

DIVIDEND EVENT DETAILS	
COUNTRY OF ISSUANCE	RUSSIAN FEDERATION
ISSUE	PJSC CHERKIZOVO GROUP - 144A
CUSIP#	164145104
UNDERLYING ISIN	RU000A0JL4R1
DEPOSITARY	BNY MELLON
DR RECORD DATE	OCTOBER 1, 2021
DR PAY DATE	OCTOBER 20, 2021
RATIO (DR to ORD)	3:2
ORD GROSS DIV. RATE	85.27 RUB
STATUTORY WITHHOLDING RATE	15%
	DOUBLE CLICK ICON BELOW TO DOWNLOAD 

IMPORTANT UPDATE:

Entitlement for Russian Federation Individuals has been reinstated at the 13% withholding rate. The change imposed in early 2021 for such entities at the 15% statutory rate only is no longer applicable.

PLEASE NOTE THAT THERE IS THE POTENTIAL FOR AUDIT ON YOUR DISCLOSED DRs BY THE RUSSIAN TAX AUTHORITIES

The Russian tax authorities may audit the electing participants and their beneficial owner clients who elect DTT rate.

For those who elect for DTT rate benefits, at a minimum, the Russian Tax Authority under point 5 article 310.2 and points 2 and 3 article 93.1, audits are expected to require an original of the Certificate of Residency (“COR”) with specific language as to the DTT between the country of residence and the Russian Federation; Beneficial Owner Confirmation regarding the final recipient of the dividend; Financial statements and documents regarding specific purchase agreement/trade confirmation. These documents must be translated into Russian, apostilled, legalized and /or notarized (as applicable). There is no time limitation for the tax authorities to reclaim the tax refunds previously paid or for the request of documents.

It should also be noted that the Russian Tax Code does not provide any guidance to the documents that may be regarded as proper identification documentation or the consequences for not providing the required documentation.

Participants and beneficial owners will be responsible and liable for any required repayment of tax relief previously received and for maintenance and provision of all supporting materials at all times, including in the event of an audit.

Please note, this notice should not be construed nor represents BNY Mellon providing any legal, tax, accounting or other professional advice on these matters. You should seek advice from an independent tax advisor.

1 Ministry of Finance of the Russian Federation. 2014. Letter No. 03-08-R3/27274 of the Ministry of Finance of the Russian Federation of 5 June 2014. [ONLINE – Russian Only] Available at: <http://www.minfin.ru/common/upload/libravr/2014/06/main/03-08-RZ27274.pdf>. [Accessed 11 June 14].

Table of Contents

ELIGIBILITY MATRIX – RELIEF AT SOURCE/QUICK REFUND..... 3

CONTACT DETAILS 5

PROCESS STEPS 5

FREQUENTLY ASKED QUESTIONS (FAQs)..... 6

FEES & DEADLINES				
FILING METHOD	BATCH	PAYMENT METHOD	TAX RELIEF FEE	FINAL SUBMISSION DEADLINE
RELIEF AT SOURCE	PAYMENT ON DR PAY DATE	DTC	UP TO \$0.005 PER DR	OCTOBER 6, 2021 8:00 P.M. EST
QUICK REFUND	IMMEDIATELY FOLLOWING DR PAY DATE	DTC	UP TO \$0.005 PER DR	NOVEMBER 15, 2021 8:00 P.M. EST

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 \$0.005 per Depositary Receipt for Relief at Source and Quick Refund, 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
EXEMPT - 0%	15%	PENSIONS RESIDENT IN:	SWITZERLAND JAPAN NOTE: EXEMPTION IS ONLY APPLICABLE FOR PENSION FUNDS IF THE ORDINARY BUSINESS ACTIVITIES OF THE FUND ARE THE FOLLOWING: PENSION MANAGEMENT OR PENSION PROVISION, PENSION CONTRIBUTIONS OR OTHER SIMILAR PAYMENTS OR INCOME PROVISION TO THE ADVANTAGE OF OTHER PENSION FUNDS.	<ol style="list-style-type: none"> 1. COVER LETTER – SCANNED COPY 2. SUMMARY 3. EXHIBIT C – CONDITIONAL RATE REQUEST*
		SELECT ENTITIES:	RUSSIAN UNIT INVESTMENT TRUSTS SOVEREIGN / GOVERNMENT ENTITY SUPRANATIONAL / WORLD EXEMPT ENTITY NOTE: ENTITIES ARE GRANTED EXEMPTION ON A CASE BY CASE BASIS AT THE DISCRETION OF THE RUSSIAN CUSTODIAN BANK OR ISSUER. ACCORDINGLY, NEITHER GLOBETAX NOR THE DEPOSITARY CAN ENSURE EXEMPTION WILL BE GRANTED. THESE ENTITIES MUST BE DISCLOSED AT THE BENEFICIAL OWNER LEVEL. AN EMAIL CONFIRMING THE BENEFICIAL OWNER'S ELIGIBILITY MAY BE REQUIRED FOR CERTAIN EXEMPT ENTITIES. PLEASE CONTACT GLOBETAX FOR FURTHER DETAILS	
FAVORABLE - 5%	10%	ALL ENTITIES RESIDENT IN:	KUWAIT, QATAR, SAUDI ARABIA	<ol style="list-style-type: none"> 1. COVER LETTER – SCANNED COPY 2. SUMMARY
FAVORABLE - 10%	5%	ALL ENTITIES RESIDENT IN:	ALBANIA, ARMENIA, AZERBAIJAN, BELGIUM, BOTSWANA, CHILE, CHINA, CROATIA, CZECHIA, DENMARK, ECUADOR, EGYPT, GREECE, HONG KONG, HUNGARY, INDIA, IRELAND, ISRAEL, ITALY, JAPAN, KAZAKHSTAN, REPUBLIC OF KOREA, KYRGYZSTAN, LATVIA, LEBANON, LITHUANIA, NORTH MACEDONIA, MALTA, MEXICO, MOLDOVA, MONGOLIA, MOROCCO, NAMIBIA, NORWAY, POLAND, SINGAPORE, SLOVAKIA, SLOVENIA, TAJIKISTAN, TURKEY, TURKMENISTAN, UNITED KINGDOM, UNITED STATES OF AMERICA, UZBEKISTAN	<ol style="list-style-type: none"> 1. COVER LETTER – SCANNED COPY 2. SUMMARY 3. EXHIBIT C - FRANCE & SPAIN RESIDENTS ONLY*
		CONDITIONAL RATE FOR RESIDENTS IN:	FRANCE AND SPAIN	
FAVORABLE- 12%	3%	ALL ENTITIES RESIDENT IN:	FINLAND	<ol style="list-style-type: none"> 1. COVER LETTER – SCANNED COPY 2. SUMMARY
RUSSIAN TAX RATE - 13%	2%	ALL ENTITIES RESIDENT IN:	RUSSIAN FEDERATION	<ol style="list-style-type: none"> 1. COVER LETTER – SCANNED COPY 2. SUMMARY

FAVORABLE STATUTORY WITHHOLDING RATE - 15%	0%	DISCLOSED HOLDERS OF DTT COUNTRIES <u>NOT</u> APPLYING FOR DTT RATES OR DISCLOSED HOLDERS OF NON-DTT COUNTRIES	1. COVER LETTER – SCANNED COPY 2. SUMMARY
UNFAVORABLE STATUTORY WITHHOLDING RATE- 15%	0%	NON-DISCLOSED HOLDERS	N/A

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

* Exhibit C is for non-ESP users only

****Non-disclosure is not permitted under the Russian tax regulations and the consequences are unclear. Participants and holders will bear all risk and responsibility if summary disclosure is not obtained and retained in support of the statutory rate.**

*****Eligibility Matrix updated to reflect 2021 DTT changes.**

Note: There are some countries with double taxation treaties with the Russian Federation that have multiple withholding rates. The lower reclaim rate applies to the Relief At Source and Quick Refund process. The higher reclaim rates generally apply to conditional situations (i.e. holding a minimum amount of outstanding shares or a special entity type). Beneficial owners who receive tax relief via the Relief At Source or Quick Refund process are ineligible to apply for a lower rate from the Russian Tax Authorities at a later date. For more information please contact GlobeTax.

PROCESS STEPS

- Go to <https://esp.globetax.com/> and disclose your ultimate beneficial owners by
 - Country of Tax Residence
 - Entity Type (either legal entity or individual)
- Sign the ESP generated cover letter and summary and email a scanned copy to GlobeTax
- Complete your withholding rate certification at DTC's CA Web

IMPORTANT: TO RECEIVE YOUR DIVIDEND WITH APPLICABLE RATE AS PER TREATY YOU MUST BOTH COMPLETE THE DISCLOSURE TO GLOBETAX AND A CORRESPONDING CA WEB CERTIFICATION AT DTC.

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 document on letterhead, sign, and email a scanned copy to GlobeTax.

These claims should be submitted through the following web site. <https://ESP.GlobeTax.com>

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

CONTACT DETAILS

PRIMARY CONTACT	POLINA KANDOVA
INTERNATIONAL PHONE	1-800-915-3536
INTERNATIONAL FAX	1-800-985-3536
DOMESTIC PHONE (U.S.)	1-212-747-9100
DOMESTIC FAX (U.S.)	1-212-747-0029
GROUP EMAIL	RUSSIAESP@GLOBETAX.COM
COMPANY	GLOBETAX SERVICES INC.
STREET ADDRESS	ONE NEW YORK PLAZA, 34 TH FLOOR
CITY/STATE/ZIP	NEW YORK, NY 10004
ADDITIONAL CONTACTS	NICOLE BRODIE

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 herefrom. 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.

FREQUENTLY ASKED QUESTIONS (FAQs)

<p>Do I need to provide a certificate of residency (“COR”)?</p>	<p>For Relief At Source and Quick Refund processes, the ESP generated forms will be required at the time of the election. However, CORs will be required in the event of an audit for those disclosing for treaty benefits and you will be liable to maintain and provide these in that event. It is expected that CORs must be translated into Russian and apostilled, legalized and/or notarized and that they must be issued as of the calendar year.</p>
<p>Is it required to use ESP to disclose?</p>	<p>If you are not able to utilize the ESP system, please contact GlobeTax to obtain copies of the ESP forms to submit manually.</p>
<p>Is there a difference between the Relief At Source and Quick Refund?</p>	<p>The process steps are the same for both processes. However, the Relief At Source period is shorter and involves payment of your dividend with tax relief on pay date. The Quick Refund is a longer period for submission and will involve payment of your tax relief after pay date. Both payments are electronic.</p>
<p>Is there an opportunity for a standard refund?</p>	<p>At this time there is no defined standard refund. Please contact GlobeTax for additional information.</p>
<p>Is it possible for me to disclose ownership of the DRs for 15% withholding even if the country of tax residence has a DTT?</p>	<p>Yes. You may indicate the shares by country of residence to disclose ownership residency but not obtain treaty benefits.²</p>
<p>Can residents of a DTT country with an entity type considered transparent disclose their DRs to receive the dividend at the double tax treaty rate?</p>	<p>The DRs of transparent entities should be disclosed at the ultimate beneficial holder level. Always check the specifics of the relevant tax treaty to ensure you are properly disclosing the DRs of the entity and country of tax residence with respect to the Russian Federation.</p>
<p>Will BNY Mellon/GlobeTax accept claims filed directly to them by beneficial owners?</p>	<p>BNY Mellon/GlobeTax will only accept claims filed by the DTC Participant who held the securities through DTC and only to the extent that the DTC has reported these holdings to us as valid.</p>
<p>Why is the summary disclosure required if the 15% statutory rate will apply for disclosed or undisclosed positions?</p>	<p>Russian regulations (Law 39-FZ) require disclosures on all positions regardless of benefit and accordingly to BNY Mellon is required to request the summary disclosure. Consequences of non-disclosure are unclear and participants and holders will bear all risk and responsibility in relation thereto.</p>

² Ministry of Finance of the Russian Federation. 2014. Letter No. 03-08-R3/27274 of the Ministry of Finance of the Russian Federation of 5 June 2014. [ONLINE – Russian Only] Available at: <http://www.minfin.ru/common/upload/library/2014/06/main/03-08-RZ27274.pdf>. [Accessed 11 June 14].