



Important Notice
The Depository Trust Company

B #:	18271-23
Date:	March 20, 2023
To:	All Participants
Category:	Tax relief, Distributions
From:	International Services
Attention:	Operations, Reorg & Dividend Managers, Partners & Cashiers
Subject:	<u>Tax Relief</u> – Country: FINLAND <u>Security:</u> Orion <u>CUSIP:</u> 68628Y104 <u>Record Date:</u> 03/24/2023 <u>Payable Date:</u> 04/17/2023 <u>Relief at Source CA Web Cut-Off:</u> 03/27/2023 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.



ORION has 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 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, all uncertified holders will receive this dividend net of the full Finnish statutory withholding tax rate of 35% with the possibility to reclaim as outlined in the eligibility matrix.

Please be aware that new Finnish legislation concerning preliminary tax withholding on dividends came into effect on January 1, 2020 requiring that a tax rate of 50% will apply to all undisclosed Finnish residents. You are hereby notified of your obligation, in accordance with published guidance from the Finnish Tax Authority, to notify dividend recipients down the chain of their obligations to report any Finnish investors that may be holding Depositary Receipts of **ORION**.

The Relief-At-Source process is facilitated only to avoid the punitive rate which is designated for undisclosed Finnish holders. All non-Finnish holders are eligible to receive the statutory rate. There is no reduced treaty rate to be received by any investor for Relief at Source.

DIVIDEND EVENT MATRIX							
ISSUE	CUSIP#	UNDERLYING ISIN	DR RECORD DATE	ORD PAY DATE	DR PAY DATE	RATIO (DR to ORD)	ORD RATE
ORION	68628Y104	FI0009014377	MARCH 24, 2023	MARCH 31, 2023	APRIL 17, 2023	2:1	EUR 1.60

FEES & DEADLINES						
FILING METHOD	BATCH	PAYMENT METHOD	CUSTODIAL FEE	DSC FEE	MINIMUM FEE PER BENEFICIAL OWNER	FINAL SUBMISSION DEADLINE
RELIEF AT SOURCE	PAYMENT ON PAY DATE	DTCC	N/A	N/A	\$0.00	CA WEB ELECTION DEADLINE: MONDAY, MARCH 27, 2023, 8:00 PM ET
						APPENDIX A DEADLINE:* TUESDAY, MARCH 28, 2023, 5:00 PM ET
LONG FORM	POST PAY DATE PROCESS, ONGOING	CHECK OR ACH	UP TO EUR 50	UP TO \$0.0075 PER DR	\$25.00	OCTOBER 15, 2026 5:00 P.M. ET

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

*APPENDIX A DEADLINE IS ONLY FOR UNDISCLOSED NON-FINNISH TAX RESIDENTS ELECTING THE 50%. PHYSICAL COPIES OR SCANS MUST BE SENT TO GLOBETAX PRIOR TO THE DEADLINE. PLEASE CONTACT GLOBETAX IF YOU NEED THIS DOCUMENT.

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., J.P. Morgan Chase, and/or Deutsche Bank Trust Company Americas 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., J.P. Morgan Chase, and/or Deutsche Bank Trust Company Americas disclosed in the DTC Important Notice posted for this event and type of claim we are submitting (Relief-at-Source or Long Form) and any other charges, fees or expenses payable by or due to BNY Mellon, Citibank N.A., J.P. Morgan Chase, and/or Deutsche Bank Trust Company Americas or its agents, including the (respective) 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., J.P. Morgan Chase, and/or Deutsche Bank Trust Company Americas' 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., J.P. Morgan Chase, and/or Deutsche Bank Trust Company Americas 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 the applicable tax regulators, and that BNY Mellon, Citibank N.A., J.P. Morgan Chase, and/or Deutsche Bank Trust Company Americas are 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 that to the best of our knowledge 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., J.P. Morgan Chase, and/or Deutsche Bank Trust Company Americas shall not be liable for the failure to secure any tax relief. We expressly agree that BNY Mellon, Citibank N.A., J.P. Morgan Chase, and/or Deutsche Bank Trust Company Americas 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., J.P. Morgan Chase, and/or Deutsche Bank Trust Company Americas and their 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.

By using this tax relief assistance service, you are authorizing and directing the disclosure of your personal information to the tax agent, the custodian, the tax authority and their respective agents. You acknowledge and agree that such disclosure may involve your personal data being sent to a tax agent, custodian, tax authority and their respective agents located in a country outside of that in which you reside. In the event that the General Data Protection Regulation 2016/679 (GDPR) or similar laws apply with regard to this tax relief assistance service, we certify that each of the beneficial owners identified, in providing this information and as indicated by Owner's signature below, expressly consents to the processing and transfer of their personal data outside of their country of residence. BNY Mellon, Citibank N.A., J.P. Morgan Chase, and/or Deutsche Bank Trust Company Americas will retain personal data in accordance with the GDPR and for further information about our data protection policies and procedures please refer to our Data Protection Policy, which can be found at <https://www.bnymellon.com/emea/en/privacy-policy.html>.

Relief at Source (RAS) - Window will be open at DTCC as of March 25, 2023 with a deadline of March 27, 2023. Payments will be made via DTCC:

- **Undisclosed Finnish Tax Residents must elect at the 50% withholding tax rate at DTCC. By electing at the 50% rate on CA Web, you are attesting that the DRs are held by Undisclosed Finnish Tax Residents.**
 - **No ESP submission is required for the 50% tax rate, however a signed Appendix A is required to be sent to GlobeTax (scanned copies accepted)**
- **All holders who are not Undisclosed Finnish Tax Residents should be elected at the 35% tax rate on DTCC. If the DTC Participant does not take action on CA Web and does not submit the 50% attestation letter (Appendix A) then GlobeTax will move your DRs to the 35% tax rate. No ESP submission is required.**

Long Form (LF):

- **All favorable rates including 0% exemption will be available via Long Form.**
- **Process remains unchanged from the typical process (note: documentation requirements found in the Eligibility Matrix for LF)**
- **LF claims can only be filed with the Tax Authority the year after ORD PD.**

ELIGIBILITY MATRIX

Note: All information related to eligibility and documentation requirements can be found on the [ESP](#) site by visiting the relevant event and viewing the Eligibility Matrix. If you need access to ESP, please complete the [New User Registration](#) form, and our team of market experts would be pleased to help you get set up.

For each Country's general Eligibility Matrix, please see ESP's [Reference Guide](#).

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

DOMESTIC PHONE (U.S.)	1-800-915-3536
DOMESTIC FAX (U.S.)	1-866-985-3536
INTERNATIONAL PHONE	1-212-747-9100
INTERNATIONAL FAX	1-212-747-0029
GROUP EMAIL	FINLANDESP@GLOBETAX.COM
COMPANY	GLOBETAX
STREET ADDRESS	ONE NEW YORK PLAZA, 34TH FLOOR
CITY/STATE/ZIP	NEW YORK, NY 10004

FREQUENTLY ASKED QUESTIONS (FAQs)

GENERAL QUESTIONS

Is this process free of charge?

No. 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. Fees will be charged for this assistance service of up to \$0.0075 per DR for long form reclaims. 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 / GlobeTax 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 / GlobeTax may be shared with its agents.

Do I need to submit via ESP to disclose my beneficial owners?

For relief at source, no ESP submission is required however physical copies of appendix a must be sent to GlobeTax at the time of filing for the claim to be valid.

	For long form, submission via ESP is required for all rates better than 35%.
Will GlobeTax accept claims filed directly to them by the beneficial owners?	No , 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.
Is the process for tax relief offered by GlobeTax an optional process?	Yes , this is a discretionary, optional service.
Are form 6166s with IRS code ruling 81-100 accepted?	Yes , with a treasury determination letter (TDL).
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.
May 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 accompany the trust agreement.
Do I need to physically send any documents to GlobeTax?	Yes , along with the electronic submission we need all required documentation listed in the eligibility matrix in hardcopy form for long form.
What is the statute of limitations for filing Finnish reclaims?	It is 3 years from the end of the year in which the dividend pays. Claims received after submission deadline will be filed on a good faith basis.
Will the FTA ask for any documents?	The FTA may ask for documentation upon audit for all rates better than 35%. For treaty benefits that documentation would likely include a certificate of residence dated the year of ORD payment date, for the 25.5.% rate it may be a tax ID card or another form of government issued ID.

RELIEF AT SOURCE QUESTIONS

Once I submit a relief at source claim, how long will it take to be paid?	Relief-at-source claims are paid on pay date through DTC.
Does the process have a minimum position requirement per beneficial owner?	No .
What happens if the participant does not make a CA Web instruction within the specified CA Web instruction window?	All DRs will be withheld at the 35% tax rate.
How do I initiate the relief at source process with GlobeTax?	To participate in the relief at source process, the only requirement for all buckets are valid elections at DTC. No ESP submission is required for the 50% or 35% elections. Non-Finnish tax residents should be elected at the 35% rate. Undisclosed Finnish tax residents should be at the 50% and the DTC participant should supply the signed appendix A.

LONG FORM QUESTIONS

Will I be paid through DTC for claims submitted through the long form process?	No , you will be paid by check or ACH.
Does the process have a minimum position requirement per beneficial owner?	No . There is a minimum fee of \$25 per beneficial owner for standard long for claims 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.

Warning and Disclaimer:

BNY Mellon, Citibank N.A., JPMorgan Chase, and/or Deutsche Bank Trust Company Americas 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., JPMorgan Chase, and/or Deutsche Bank Trust Company Americas 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., JPMorgan Chase, and/or Deutsche Bank Trust Company Americas 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., JPMorgan Chase, and/or Deutsche Bank Trust Company Americas 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.