



**Important Notice**  
The Depository Trust Company

<b>B #:</b>	20402-24
<b>Date:</b>	July 17, 2024
<b>To:</b>	All Participants
<b>Category:</b>	Tax Relief, Distributions
<b>From:</b>	International Services
<b>Attention:</b>	Operations, Reorg & Dividend Managers, Partners & Cashiers
<b>Subject:</b>	<p><b><u>Tax Relief Country:</u></b> ITALY</p> <p><b><u>Security Name:</u></b> ENEL SPA</p> <p><b><u>CUSIP:</u></b> 29265W207</p> <p><b><u>Record Date:</u></b> 07/23/2024</p> <p><b><u>Payable Date:</u></b> 08/14/2024</p> <p><b><u>Quick Refund CA Web Instruction Deadline:</u></b> 07/30/2024 8:00 P.M. ET</p>

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

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

On Depositary Receipt Pay Date, all holders will receive this dividend net of the full Italian statutory withholding tax rate of **26%** with the possibility to reclaim through the Quick Refund or Long Form process.

**ORIGINAL DOCUMENTATION WILL BE REQUIRED.**

**ALL DATES ON ALL FORMS MUST BE BEFORE THE LOCAL PAYMENT DATE IN ITALY.**

**TAX RELIEF FEES AND DOCUMENTATION WILL BE REQUIRED UPFRONT ON ANY ITALIAN LONG FORM CLAIMS FILED.**

DIVIDEND EVENT MATRIX							
ISSUE	CUSIP#	UNDERLYING ISIN	DR RECORD DATE	ORD PAY DATE	DR PAY DATE	RATIO (DR to ORD)	ORD RATE
ENEL SPA	29265W207	IT0003128367	JULY 23, 2024	JULY 24, 2024	AUGUST 14, 2024	1:1	EUR 0.215

FEES & DEADLINES						
FILING METHOD	BATCH	PAYMENT METHOD	CUSTODIAL FEE	DSC FEE	MINIMUM FEE PER BENEFICIAL OWNER	FINAL SUBMISSION DEADLINE
QUICK REFUND	FIRST	DTC	UP TO EUR 90	UP TO \$0.0055 PER DR	\$25.00	<b><u>ESP AND CA WEB DEADLINE:</u></b> JULY 30, 2024 8:00 PM ET
						<b><u>DOCUMENTATION DEADLINE:</u></b> JULY 30, 2024 5:00 PM ET
QUICK REFUND*	FINAL	CHECK OR ACH	UP TO EUR 90	UP TO \$0.0055 PER DR	\$25.00	<b><u>ESP DEADLINE:</u></b> SEPTEMBER 2, 2024 8:00 PM ET
						<b><u>DOCUMENTATION DEADLINE:</u></b> SEPTEMBER 2, 2024 5:00 PM ET
LONG FORM	FINAL	CHECK OR ACH	UP TO EUR 90	UP TO \$0.0055 PER DR	\$25.00	APRIL 24, 2028

\*All claims after the first Quick Refund deadline/batch for this event will be filed in good faith, with no guarantee claims that will be accepted or paid by the withholding agent.

**All Long Form Tax Relief and Custodial fees (if applicable) must be paid upfront with proof of documentation and are not contingent upon any particular outcome.**

## MINIMUM SHARE AMOUNT REQUIRED TO FILE A CLAIM (CLAIMS RECEIVED BELOW THE FILING MINIMUM WILL BE REJECTED)

BENEFICIAL OWNER'S WITHHOLDING TAX RATE OF ENTITLEMENT	RATE OF RECLAIM	MINIMUM # OF DRs REQUIRED TO FILE (BASED OFF AN APPROX. EXCHANGE RATE OF 1.074750 USD PER EURO)
25.00%	1.00%	23,805 DRs
20.00%	6.00%	3,970 DRs
15.00%	11.00%	2,165 DRs
11.00%	15.00%	1,590 DRs
10.00%	16.00%	1,490 DRs
1.00%	21.00%	1,135 DRs
1.20%	24.80%	960 DRs
0.00%	26.00%	920 DRs

### Indemnification

The undersigned hereby indemnifies J.P. Morgan Chase Bank, N.A. ("J.P. Morgan"), BNY Mellon, Citibank, N.A., Deutsche Bank Trust Company Americas and its affiliates, agents, directors or employees acting in their capacities as such (each an "Indemnified Party"), for any losses or liabilities suffered by an Indemnified Party on account of (i) a failure to secure a refund; or (ii) funds erroneously received by J.P. Morgan, BNY Mellon, Citibank, N.A., Deutsche Bank Trust Company Americas or the undersigned or their clients; or (iii) funds claimed as a refund by J.P. Morgan, BNY Mellon, Citibank, N.A., Deutsche Bank Trust Company Americas or the undersigned or their clients, including any tax charges, penalties, interests that is or becomes payable by an Indemnified Party in respect thereon, (iv) funds claimed by any statutory or government authority or administrative department or tax authority as charges, penalties, interests or otherwise in respect of a tax reclaim by the undersigned, and agree that such amounts shall be promptly remitted by the undersigned to J. P. Morgan, BNY Mellon, Citibank, N.A., and Deutsche Bank Trust Company Americas on request. This indemnity shall survive any termination of the letter.

For the avoidance of doubt and notwithstanding the above, J. P. Morgan, BNY Mellon, Citibank, N.A., and Deutsche Bank Trust Company Americas shall be entitled to require a prompt remittance by the undersigned of any amounts claimed by any statutory or government authority or administrative department or tax authority as charges, penalties, interests or otherwise in respect of a tax reclaim by the undersigned. J.P. Morgan, BNY Mellon, Citibank, N.A., and Deutsche Bank Trust Company Americas are not liable for failure to secure a refund or for any charges, penalties, interests or otherwise payable or paid in respect of a tax reclaim by the undersigned. Any funds erroneously claimed or received shall be immediately returned to J.P. Morgan, BNY Mellon, Citibank, N.A., and Deutsche Bank Trust Company Americas including any interest, additions to tax or penalties or charges in respect thereon. Nothing herein constitutes tax advice. Please consult your tax advisor prior to engaging our services.

## 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



JPMorgan Chase Bank, N.A. 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.)	800-929-5484
DOMESTIC FAX (U.S.)	800-929-9986
INTERNATIONAL PHONE	212-747-9100
INTERNATIONAL FAX	212-747-0029
GROUP EMAIL	<a href="mailto:ITALYESP@GLOBETAX.COM">ITALYESP@GLOBETAX.COM</a>
COMPANY	GLOBE TAX SERVICES, INC.
STREET ADDRESS	ONE NEW YORK PLAZA, 34 <sup>TH</sup> FLOOR
CITY/STATE/ZIP	NEW YORK, NY 10004

## FREQUENTLY ASKED QUESTIONS (FAQs)

### GENERAL QUESTIONS

**How do I obtain the required documentation for long form reclaims?**

Please contact [ItalyESP@globetax.com](mailto:ItalyESP@globetax.com) regarding interest in submitting a long form reclaim. We can provide you with the necessary documentation and list of requirements that each custodian has to file a complete reclaim.

**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.

**Is the process for tax relief offered by the DR Depository banks an optional process?**

Yes, this is a discretionary, optional service.

**Are the quick refund and long form processes 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. JPMorgan Chase Bank, N.A., BNY Mellon, Citibank N.A., 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. Fees will be charged for this assistance service of up to \$0.0055 per DR for quick refund and standard long form reclaims with a minimum of \$25.00 and a custodial charge up to EUR 90.00 for quick refund and standard long form. 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 JPMorgan Chase Bank, N.A., BNY Mellon, Citibank N.A., and/or Deutsche Bank Trust Company Americas 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 JPMorgan Chase Bank, N.A., BNY Mellon, Citibank N.A., and/or Deutsche Bank Trust Company Americas may be shared with its agents and affiliates.

***Warning and Disclaimer:***

The information and data contained in this Notice is based on information obtained from multiple sources believed to be reliable. However, JPMorgan Chase Bank, N.A., Citibank N.A., BNY Mellon, and/or Deutsche Bank Trust Company Americas and its agents do not warrant or guarantee the accuracy or completeness of, nor undertake to update or amend, this information or data. We and our agents expressly disclaim any liability whatsoever for any loss howsoever arising from or in reliance upon any of this information or data. The information contained in this Notice is subject to change, including in the and subject to discretion of third parties, and/or pre-emption or being superseded by local market rules, and practices or actions taken by non-U.S. agents or tax authorities. Deadlines often differ from statutory deadlines. You should file claims as soon as possible, and at least six months prior to the specified deadline.