



**Important Notice**  
The Depository Trust Company

<b>B #:</b>	21551-25
<b>Date:</b>	March 18, 2025
<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>	Tax Relief Country: Italy Security: ENI S.P.A. CUSIP: 26874R108 Record Date: 3/25/2025 Payable Date: 4/7/2025

**\*\*\*NOT CA WEB ELIGIBLE\*\*\***

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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**ENI S.P.A.** has announced a cash dividend and Citibank N.A., acts as Depositary for the Depositary Receipt ("DR") program. Holders may be eligible to receive reduced withholding tax relief. Further details on limitations, fees, charges and deadlines are outlined below.

On Depositary Receipt Pay Date, all holders will receive this dividend net of the full Italian statutory withholding tax rate of **26%**.

Subsequent to the payment date on which the dividend less the 26% withholding tax will be paid, Beneficial Owners may reclaim the difference between the statutory rate and the Beneficial Owner's rate of entitlement by submitting the required documentation to GlobeTax. This issue is NOT eligible through CA Web. There will be one "Quick Refund" filing deadline as stipulated below; all claims submitted after this date should be submitted through the Standard "Long-Form" filing procedure.

**PLEASE NOTE:**

1. **ORIGINAL FORMS WILL BE REQUIRED.**
2. **2025 CERTIFICATE OF RESIDENCIES AND 6166s ARE REQUIRED.**
3. **ALL DATES ON ALL FORMS MUST BE BEFORE THE LOCAL PAYMENT DATE IN ITALY AND DATED FOR YEAR 2025.**
4. **THE CBDIV25 FORM MUST BE PRINTED WITH PAGES 1-2 DOUBLE SIDED, PAGE 3 STAND ALONE.**
5. **A LEGAL REPRESENTATIVE MUST BE NAMED AND SIGN ALL CLAIM DOCUMENTS. SECTION 1 OF THE CBDIV FORM REQUIRES DETAILS SPECIFIC TO THE LEGAL REPRESENTATIVE, INCLUDING FISCAL CODE, BE FILLED OUT.**
6. **AN AUTHORIZED SIGNATORY LETTER FOR THE LEGAL REPRESENTATIVE WILL BE REQUIRED.**
7. **POA FROM BENEFICIAL OWNER TO PARTICIPANT MUST BE ON BENEFICIAL OWNER LETTERHEAD.**
8. **A CONFIRMATION OF RECORD DATE POSITION (DTC SCREENSHOT) IS REQUIRED.**

## DIVIDEND EVENT MATRIX

ISSUE	CUSIP#	UNDERLYING ISIN	DR RECORD DATE	ORD PAY DATE	DR PAY DATE	RATIO (DR to ORD)	ORD RATE
ENI S.P.A.	26874R108	IT0003132476	MARCH 25, 2025	MARCH 26, 2025	APRIL 7, 2025	1:2	EUR 0.25

## FEES & DEADLINES

FILING METHOD	BATCH	PAYMENT METHOD	CUSTODIAL FEE	DSC FEE	MINIMUM FEE PER BENEFICIAL OWNER	FINAL SUBMISSION DEADLINE
QUICK REFUND	FINAL	CHECK OR ACH	UP TO EUR 90	UP TO \$0.0075 PER DR	\$125.00	<b><u>ESP SUBMISSION DEADLINE</u></b> APRIL 1, 2025 5:00 PM ET
						<b><u>DOCUMENTATION DEADLINE</u></b> APRIL 1, 2025 5:00 PM ET
LONG FORM	FINAL	CHECK OR ACH	UP TO EUR 90	UP TO \$0.0075 PER DR	\$125.00	DECEMBER 22, 2028

Long Form claims will only be accepted after the "Quick Refund" window has closed. We encourage Beneficiaries to file Long Form only as a last resort alternative to Quick Refund. Note, this Important Notice does not contain instructions or the exhibit forms required to file Long Form claims.

Effective March 13, 2018, Tax Relief and Custodial Fees will be required upfront on any Italian Long Form claims filed where Citibank, N.A., act as depositary bank. GlobeTax, as agent for the depositary bank, requires the collection of all Italian Long Form claim documents to be provided prior to Tax Relief and Custodial Fees being paid upfront. Upon receipt of the Tax Relief and Custodial fees by GlobeTax, the claims will be lodged with the local market agent.

**All Tax Relief and Custodial fees (if applicable) must be paid upfront 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 1.0403 EURO PER USD)
25.00%	1.00%	66,065 DRs
20.00%	6.00%	11,015 DRs
15.00%	11.00%	6,010 DRs
11.00%	15.00%	4,405 DRs
10.00%	16.00%	4,130 DRs
5.00%	21.00%	3,150 DRs
1.20%	24.80%	2,665 DRs
0.00%	26.00%	2,545 DRs

### Indemnification

I/We have determined that the beneficial owner(s) of the shares (individual or legal entity) is eligible for the preferential rates as stated herein and I declare that I have performed all the necessary due diligence to satisfy myself as to the accuracy of the information submitted to me by these beneficial owners.

I/we hereby certify that I/we will indemnify Citibank, N.A., (and its agents) for any liability Citibank, N.A., (and its agents) may incur, including without limitations any sanctions-related liability such as fines, penalties, costs and/or fees relating to government inquiries, investigations, or enforcement actions, as a result of reliance upon information provided by such Participant in connection with a C.A. Web election, a claim for refund, or a failure to provide information requested by the Tax Authorities. Citibank, N.A., shall not be liable for failure to secure the refund. The Participant shall be liable for any loss due to foreign exchange fluctuation. The Participant agrees to immediately return to Citibank, N.A., any funds erroneously received as a result of an improper C.A. Web election or refund claim. In addition, the Participant agrees to pay any interest, additions to tax or penalties thereon. This is not tax advice. Please consult your tax advisor.

## 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](#).



Citibank, 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

<b>DOMESTIC PHONE (U.S.)</b>	1-800-628-4646
<b>DOMESTIC FAX (U.S.)</b>	1-800-633-4646
<b>INTERNATIONAL PHONE</b>	1-212-747-9100
<b>INTERNATIONAL FAX</b>	1-212-747-0029
<b>GROUP EMAIL</b>	<a href="mailto:ITALYESP@GLOBETAX.COM">ITALYESP@GLOBETAX.COM</a>
<b>COMPANY</b>	GLOBE TAX SERVICES, INC.
<b>STREET ADDRESS</b>	ONE NEW YORK PLAZA, 34 <sup>TH</sup> FLOOR
<b>CITY/STATE/ZIP</b>	NEW YORK, NY 10004

## FREQUENTLY ASKED QUESTIONS (FAQs)

### GENERAL QUESTIONS

<b>How do I obtain the required documentation for long form reclaims?</b>	Please contact 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.  Note, upfront fees are required for Long Form claims and GlobeTax does require documentation to be provided prior to the collection of fees.
<b>Will GlobeTax accept claims filed directly to them by beneficial owners?</b>	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
<b>Is the process for tax relief offered by the DR Depository banks an optional process?</b>	Yes, this is a discretionary, optional service.
<b>If successful, when can payment on a long form claim be expected?</b>	Generally, claims take a minimum of seven years to pay if successful.

### **WARNING AND DISCLAIMER:**

*The information and data contained in this Notice is based on information obtained from multiple sources believed to be reliable. However, CITIBANK N.A. 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.*