



**Important Notice**  
The Depository Trust Company

<b>B #:</b>	21325-25
<b>Date:</b>	March 21, 2025
<b>To:</b>	All Participants
<b>Category:</b>	Tax Relief, Distribution
<b>From:</b>	International Services
<b>Attention:</b>	Operations, Reorg & Dividend Managers, Partners & Cashiers
<b>Subject:</b>	Tax Relief - Country: Belgium Securities: See Below CUSIPs: 74428W108, 23292C102, 269271102 Record Date: Various Payable Date: Various

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

Issue	CUSIP	Record Date
PROXIMUS	74428W108	12/9/2024
D'IETEREN GROUP	23292C102	12/12/2024
EVS BROADCAST EQUIPMENT	269271102	11/29/2024

Questions regarding this Important Notice may be directed Globe Tax at BELGIUMESP@GOBETAX.COM.

**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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**BELGIUM** Issuers have announced a cash dividend and **The Bank of New York Mellon (“BNY”)** acts as one of the Depositories for the Depository Receipt (“DR”) program.

As outlined in the Eligibility Matrix, all holders will receive this dividend net of the full Belgian withholding tax rate of **30%** with the possibility to reclaim through the Long Form process.

**LONG FORM REQUIREMENTS UPDATE:**

- **ALL INDIVIDUAL RECLAIM APPLICATIONS MUST INCLUDE A COPY OF THE BENEFICIAL OWNER'S IDENTITY CARD.**
- **ALL LEGAL ENTITIES ARE REQUIRED TO DISCLOSE THEIR VAT-NUMBER OR LEI NUMBER (LEGAL ENTITY IDENTIFIER).**
- **A SIGNATORY LIST IS REQUIRED FOR AUTHORIZED REPRESENTATIVES SUBMITTING ON BEHALF OF A CLIENT OR A DOCUMENT PROVING THAT THE PERSON WHO SIGNED THE APPLICATION MAY ALSO EFFECTIVELY REPRESENT THE COMPANY FOR ALL APPLICABLE ENTITIES.**
- **RECLAIM APPLICATIONS MUST INCLUDE AN EXTRACT FROM THE HOLDER'S LOCAL BUSINESS REGISTRAR CONFIRMING THE CLAIMANT IS REGISTERED FOR ALL NON-INDIVIDUAL AND GOVERNMENT ENTITIES.**

**DIVIDEND EVENT MATRIX**

ISSUE	CUSIP#	UNDERLYING ISIN	DR RECORD DATE	ORD PAY DATE	DR PAY DATE	RATIO (DR to ORD)	ORD RATE
PROXIMUS	74428W108	BE0003810273	12/9/2024	12/6/2024	12/23/2024	5:1	0.50 EUR
D'IETEREN GROUP	23292C102	BE0974259880	12/12/2024	12/12/2024	12/27/2024	2:1	74.0 EUR
EVS BROADCAST EQUIPMENT	269271102	BE0003820371	11/29/2024	11/22/2024	12/9/2024	4:1	0.50 EUR

**\*FEES & DEADLINES\***

FILING METHOD	BATCH	PAYMENT METHOD	SHARE MINIMUM (DRs)	CUSTODIAL FEE	TAX RELIEF FEE	MINIMUM FEE PER BENEFICIAL OWNER	FINAL SUBMISSION DEADLINE (ESP)
<b>LONG FORM</b>	ONGOING	CHECK OR ACH	N/A	N/A	UP TO \$0.01 PER DR	\$125.00	OCTOBER 31, 2028

\*The Fees are that of BNY as First Filer. Deadlines are set by GlobeTax Services, Inc.

## 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, Citibank, N.A., JPMorgan Chase Bank, N.A., and 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, Citibank, N.A., JPMorgan Chase Bank, N.A., and Deutsche Bank Trust Company Americas disclosed in the DTC Important Notice posted for this event and type of claim we are submitting (Long Form) and any other charges, fees or expenses payable by or due to BNY, Citibank, N.A., JPMorgan Chase Bank, N.A., and 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, Citibank, N.A., JPMorgan Chase Bank, N.A., and 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, Citibank, N.A., JPMorgan Chase Bank, N.A., and 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 applicable tax regulators, and that BNY, Citibank, N.A., JPMorgan Chase Bank, N.A., and Deutsche Bank Trust Company Americas 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, Citibank, N.A., JPMorgan Chase Bank, N.A., and Deutsche Bank Trust Company Americas shall not be liable for the failure to secure any tax relief. We expressly agree that BNY, Citibank, N.A., JPMorgan Chase Bank, N.A., and 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, Citibank, N.A., JPMorgan Chase Bank, N.A., and Deutsche Bank Trust Company Americas 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.

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 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>."

## 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](#).**

## NOTE ON QUALIFYING NON-U.S. PENSIONS

According to Belgian Statutory law, all foreign pension funds are exempt as long as certain conditions are met. The Exempt 0% rate applies on dividends paid to pension funds if they comply with the following cumulative conditions:

- They must hold shares for an uninterrupted period of 60 days,
- They are non-resident,
- They are the Beneficial Owners of the income,
- They are tax exempt,
- They must have legal personality of which the only purpose is managing and investing funds for the purpose of paying pensions AND with a non-profit purpose in activities
- They must not be under a contractual arrangement to pay the income to another entity.

## NOTE ON REDUCED WITHHOLDING TAX FOR DIVIDEND DISTRIBUTIONS TO CERTAIN MINORITY CORPORATE SHAREHOLDERS

Reduced rate for participations of at least 2.5 million EUR: Belgian domestic law provides for a reduced withholding tax rate of 1.6995% for dividends distributed to qualifying non-resident companies (i) which are resident in the European Economic Area (EEA) or in a state with which Belgium concluded a DTT that includes an exchange of information clause, and (ii) which hold (or will hold) a participation of less than 10% with an acquisition value of at least 2.5 million EUR for at least one year. The reduced rate does not apply to the extent that the non-resident shareholder can credit or obtain a reimbursement of the Belgian withholding tax.

Please contact your tax advisor or GlobeTax for specific details.

# ESP



BNY 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.)	1-800-985-3536
INTERNATIONAL PHONE	1-212-747-9100
INTERNATIONAL FAX	1-212-747-0029
GROUP EMAIL	<a href="mailto:BELGIUMESP@GLOBETAX.COM">BELGIUMESP@GLOBETAX.COM</a>
COMPANY	GLOBETAX SERVICES INC.
STREET ADDRESS	ONE NEW YORK PLAZA, 34TH FLOOR
CITY/STATE/ZIP	NEW YORK, NY 10004

## FREQUENTLY ASKED QUESTIONS (FAQS)

### LONG FORM QUESTIONS

<b>Are there any additional eligibility requirements I should know about?</b>	<b>Yes.</b> If the beneficial owner is engaged in a trade or business in Belgium through a permanent establishment in Belgium, they are ineligible to claim through this process. Additionally, transparent entities are no longer accepted; only the underlying holder of a transparent entity may submit the claim with the condition that the underlying holder should be a non-transparent entity or a natural person. Individuals are also required to disclose their date of birth as well as city and country of birth on tax documents. Please refer to the eligibility matrix and “DESCRIPTION OF VARIOUS DOCUMENTATION” for more details and updated requirements.
<b>Do I need to physically send any documents to GlobeTax?</b>	<b>Yes.</b> Along with the electronic submission we need all the required documentation in hard copy form.
<b>Can I sign the authorization on behalf of my client?</b>	<b>Yes.</b> However, in addition to the authorization letter, you must provide a power of attorney from the beneficial owner giving you authorization to sign on their behalf. A signatory list is also required as verification of the person who is signing the reclaim form.
<b>Is the process for tax relief offered by the Depository Banks an optional process?</b>	<b>Yes.</b> This is a discretionary, optional service.
<b>Will I be paid through DTC for claims submitted through the Long Form process?</b>	<b>No.</b> You will be paid by check or ACH.
<b>Does the Long Form process have a minimum position per beneficial owner requirement?</b>	<b>No.</b> There is a minimum fee of \$125 per beneficial owner for standard long for claims which may be waived on an exceptional basis for clients reclaiming less than \$250. In such instances a fee of 50% of the reclaimed amount will be applied.
<b>Is this Long Form process free of charge?</b>	<b>No.</b> This tax relief assistance service is wholly voluntary and discretionary and outside the terms and conditions of any applicable deposit agreement. BNY, Citibank, N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank, N.A. undertake 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 service of up to \$0.01 per DR with a \$125 minimum, and any other charges, fees or expenses payable by or due to BNY, Citibank, N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank, N.A. or its agents, including the custodian or to tax authorities or regulators. Fees paid to BNY, Citibank, N.A., Deutsche Bank Trust Company Americas, JPMorgan Chase Bank, N.A. may be shared with its agents.

**Warning and Disclaimer:**

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