



Important Notice
The Depository Trust Company

B #:	15509-21
Date:	September 20, 2021
To:	All Participants
Category:	Tax Relief, Distributions
From:	International Services
Attention:	Operations, Reorg & Dividend Managers, Partners & Cashiers
Subject:	<p><u>Tax Relief Country:</u> Italy</p> <p><u>Security:</u> Eni S.P.A.</p> <p><u>CUSIP:</u> 26874R108</p> <p><u>Record Date:</u> 9/21/2021</p> <p><u>Payable Date:</u> 10/7/2021</p> <p>*****NOT CA WEB ELIGIBLE*****</p>

Holders of Depository Receipts (DRs) of **Eni S.P.A.** may be eligible to receive favorable or reduced withholding tax relief.

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

Questions regarding this Important Notice may be directed to Globetax Services Inc. 1-212-747-9100.

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 eligibility, documentation, limitations, fees, charges and deadlines are included 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.

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DIVIDEND EVENT DETAILS	
COUNTRY OF ISSUANCE	ITALY
ISSUE	ENI S.P.A.
CUSIP#	26874R108
UNDERLYING ISIN	IT0003132476
DEPOSITARY	CITIBANK N.A.
ADR RECORD DATE	SEPTEMBER 21, 2021
ORD PAY DATE	SEPTEMBER 22, 2021
ADR PAY DATE	OCTOBER 7, 2021
RATIO (DR to ORD)	1: 2
ORD RATE	EUR 0.43
STATUTORY WITHHOLDING RATE	26%
	DOUBLE CLICK ICON BELOW TO DOWNLOAD 

PLEASE NOTE:

- ORIGINAL DOCUMENTATION WILL BE REQUIRED.**
- SUPPORTING DOCUMENTATION (CORs, TAX FORMS, ETC.) IS NOT REQUIRED FOR ANY BENEFICIAL OWNER THAT WAS PAID DURING THE SPRING CYCLE ENI, R/D 5/25/2021. YOU MUST STILL SUBMIT VIA ESP AND PROVIDE A SIGNED COVER LETTER.**
- ALL DATES ON ALL FORMS MUST BE BEFORE THE LOCAL PAYMENT DATE IN ITALY.**
- ALL NON - US CORs NEED TO CITE THE TAX TREATY WITH ITALY.**
- 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.**

FEES & DEADLINES

FILING METHOD	PAYMENT METHOD	MINIMUM RECLAIM VALUE (USD)	CUSTODIAL FEE	DSC FEE	MINIMUM FEE PER BENEFICIAL OWNER	FINAL SUBMISSION DEADLINE (ESP)
QUICK REFUND	ACH/CHECK	\$125.00	UP TO 90.00 EUR	UP TO \$0.0075 PER DR	\$25.00	OCTOBER 4, 2021 8:00 PM ET
LONG FORM	ACH/CHECK	\$125.00	UP TO 90.00 EUR	UP TO \$0.0075 PER DR	\$25.00	JULY 21, 2025

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. This important notice does not contain instruction or the required exhibit forms 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 depository bank. Upon receipt of the Tax Relief and Custodial fees by GlobeTax as Agent for the depository bank, 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.

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 – QUICK REFUND

RATE DESCRIPTION	RECLAIM RATE	ELIGIBLE RESIDENTS	DOCUMENTATION REQUIRED	SIGNATURE REQUIRED
UNFAVORABLE - 26%	0%	NON-TREATY COUNTRIES AND ENTITIES NOT MENTIONED AS FAVORABLE OR EXEMPT BELOW	1. NONE	1. N/A
FAVORABLE - 25%	1%	(INDIVIDUALS & NON-INDIVIDUALS) INDIA, PAKISTAN	1. ORIGINAL COVER LETTER 2. ORIGINAL CERTIFICATE OF RESIDENCY IF THE CBDIV 21 IS NOT STAMPED BY LOCAL FISCAL AUTHORITIES 3. ORIGINAL CBDIV 21	1. YES – DTC PARTICIPANT 2. LOCAL TAX AUTHORITIES 3. YES – BENEFICIARY OR LEGAL REPRESENTATIVE
FAVORABLE - 20%	6%	(INDIVIDUALS & NON-INDIVIDUALS) EGYPT, THAILAND, TRINIDAD AND TOBAGO	1. ORIGINAL COVER LETTER 2. ORIGINAL CERTIFICATE OF RESIDENCY IF THE CBDIV 21 IS NOT STAMPED BY LOCAL FISCAL AUTHORITIES 3. ORIGINAL CBDIV 21	1. YES – DTC PARTICIPANT 2. LOCAL TAX AUTHORITIES 3. YES – BENEFICIARY OR LEGAL REPRESENTATIVE
FAVORABLE - 15%	11%	(INDIVIDUALS & NON-INDIVIDUALS) ALGERIA, ARGENTINA, AUSTRALIA, AUSTRIA, BANGLADESH, BARBADOS, BELARUS, BELGIUM, BRAZIL, CANADA, CONGO (REPUBLIC OF), CROATIA, CYPRUS, CZECH REPUBLIC, DENMARK, ECUADOR, ESTONIA, FINLAND, FRANCE, GERMANY, GHANA, GREECE, ICELAND, INDONESIA, IRELAND, ISRAEL, IVORY COAST (COTE D'IVOIRE), JAPAN, KAZAKHSTAN, KOREA (REPUBLIC OF), KYRGYZSTAN, LATVIA, LEBANON, LITHUANIA, LUXEMBOURG, MALTA, MAURITIUS, MEXICO, MOLDOVA, MOROCCO, MOZAMBIQUE, NETHERLANDS, NEW ZEALAND, NORTH MACEDONIA (FORMER YUGOSLAV REPUBLIC OF), NORWAY, PHILIPPINES, PORTUGAL, QATAR, SAN MARINO, SENEGAL, SLOVAKIA, SLOVENIA, SOUTH AFRICA, SPAIN, SRI LANKA, SWEDEN, SWITZERLAND, TAJIKISTAN, TUNISIA, TURKEY, TURKMENISTAN, UGANDA, UKRAINE, UNITED ARAB EMIRATES, UNITED KINGDOM, UNITED STATES, URUGUAY, VIETNAM, ZAMBIA	1. ORIGINAL COVER LETTER 2. ORIGINAL CERTIFICATE OF RESIDENCY OR IRS FORM 6166 IF THE CBDIV 21 IS NOT STAMPED BY LOCAL FISCAL AUTHORITIES 3. ORIGINAL CBDIV 21	1. YES – DTC PARTICIPANT 2. LOCAL TAX AUTHORITIES OR IRS REPRESENTATIVE 3. YES – BENEFICIARY OR LEGAL REPRESENTATIVE
FAVORABLE - 15%	11%	UNITED STATES (CHARITIES AND PENSIONS)	1. ORIGINAL COVER LETTER 2. ORIGINAL IRS FORM 6166 3. ORIGINAL CBDIV 21 4. ORIGINAL ANNEX B	1. YES – DTC PARTICIPANT 2. LOCAL TAX AUTHORITIES OR IRS REPRESENTATIVE 3. YES – BENEFICIARY OR LEGAL REPRESENTATIVE 4. YES – BENEFICIARY OR LEGAL REPRESENTATIVE

ELIGIBILITY MATRIX – QUICK REFUND (CONTINUED)

RATE DESCRIPTION	RECLAIM RATE	ELIGIBLE RESIDENTS	DOCUMENTATION REQUIRED	SIGNATURE REQUIRED
FAVORABLE – 15%	11%	UNITED STATES (TRUSTS / PARTNERSHIPS)	<ol style="list-style-type: none"> 1. ORIGINAL COVER LETTER 2. ORIGINAL IRS FORM 6166 3. ORIGINAL CBDIV 21 4. ORIGINAL APPENDIX US GROUP TRUST OR 5. APPENDIX US PARTNERSHIP CBDIV-SELF DECLARATION 	<ol style="list-style-type: none"> 1. YES – DTC PARTICIPANT 2. LOCAL TAX AUTHORITIES OR IRS REPRESENTATIVE 3. YES – BENEFICIARY OR LEGAL REPRESENTATIVE 4. YES – BENEFICIARY OR LEGAL REPRESENTATIVE 5. YES – BENEFICIARY OR LEGAL REPRESENTATIVE
FAVORABLE - 11%	15%	EU/EEA PENSION FUNDS	<ol style="list-style-type: none"> 1. ORIGINAL COVER LETTER 2. ORIGINAL EU PENSION CERTIFICATE OF RESIDENCY IF THE CBDIV 21 IS NOT STAMPED BY LOCAL FISCAL AUTHORITIES 3. ORIGINAL CBDIV 21 	<ol style="list-style-type: none"> 1. YES – DTC PARTICIPANT 2. LOCAL TAX AUTHORITIES 3. YES – BENEFICIARY OR LEGAL REPRESENTATIVE
FAVORABLE - 10%	16%	(INDIVIDUALS & NON-INDIVIDUALS) ALBANIA, ARMENIA, AZERBAIGIAN, BOSNIA-HERZEGOVINA, BULGARIA, CHILE, CHINA, ETHIOPIA, GEORGIA, HONG KONG, HUNGARY, JORDAN, MALAYSIA, MONTENEGRO, OMAN, PANAMA, POLAND, RUSSIAN FEDERATION, SAUDI ARABIA, SERBIA, SYRIA, SINGAPORE, TAIWAN, TANZANIA, UZBEKISTAN, VENEZUELA	<ol style="list-style-type: none"> 1. ORIGINAL COVER LETTER 2. ORIGINAL CERTIFICATE OF RESIDENCY IF THE CBDIV 21 IS NOT STAMPED BY LOCAL FISCAL AUTHORITIES 3. ORIGINAL CBDIV 21 	<ol style="list-style-type: none"> 1. YES – DTC PARTICIPANT 2. LOCAL TAX AUTHORITIES 3. YES – BENEFICIARY OR LEGAL REPRESENTATIVE
FAVORABLE - 5%	21%	ROMANIA INDIVIDUALS & NON-INDIVIDUALS	<ol style="list-style-type: none"> 1. ORIGINAL COVER LETTER 2. ORIGINAL CERTIFICATE OF RESIDENCY IF THE CBDIV 21 IS NOT STAMPED BY LOCAL FISCAL AUTHORITIES 3. ORIGINAL CBDIV 21 	<ol style="list-style-type: none"> 1. YES – DTC PARTICIPANT 2. LOCAL TAX AUTHORITIES 3. YES – BENEFICIARY OR LEGAL REPRESENTATIVE
FAVORABLE - 1.20%	24.80%	EU/EEA CORPORATE ENTITIES	<ol style="list-style-type: none"> 1. ORIGINAL COVER LETTER 2. ORIGINAL EU CORPORATE CERTIFICATE OF RESIDENCY 3. ORIGINAL CBDIV 21 	<ol style="list-style-type: none"> 1. YES – DTC PARTICIPANT 2. LOCAL TAX AUTHORITIES 3. YES – BENEFICIARY OR LEGAL REPRESENTATIVE
EXEMPT – 0%	26%	EU/EEA UCITS/INVESTMENT FUNDS	<ol style="list-style-type: none"> 1. ORIGINAL COVER LETTER 2. ORIGINAL EU UCITS/INVESTMENT FUND CERTIFICATE OF RESIDENCY 3. ORIGINAL CBDIV 21 4. EU UCITS EXEMPTION ATTESTATION 	<ol style="list-style-type: none"> 1. YES – DTC PARTICIPANT 2. LOCAL TAX AUTHORITIES 3. YES – BENEFICIARY OR LEGAL REPRESENTATIVE 4. YES – BENEFICIARY OR LEGAL REPRESENTATIVE

ELIGIBILITY MATRIX – QUICK REFUND (CONTINUED)

RATE DESCRIPTION	RECLAIM RATE	ELIGIBLE RESIDENTS	DOCUMENTATION REQUIRED	SIGNATURE REQUIRED
EXEMPT – 0%	26%	KUWAIT INDIVIDUALS & NON-INDIVIDUALS	<ol style="list-style-type: none"> 1. ORIGINAL COVER LETTER 2. ORIGINAL CERTIFICATE OF RESIDENCY IF THE CBDIV 21 IS NOT STAMPED BY LOCAL AUTHORITIES 3. ORIGINAL CBDIV 21 	<ol style="list-style-type: none"> 1. YES – DTC PARTICIPANT 2. LOCAL TAX AUTHORITIES 3. YES – BENEFICIARY OR LEGAL REPRESENTATIVE 4. YES – BENEFICIARY OR LEGAL REPRESENTATIVE

*Note: All documents listed in **BLUE font** are generated by GlobeTax's ESP website after submission of beneficial owner data

**Additional documentation may be required per the custodian's discretion.

DESCRIPTION OF VARIOUS DOCUMENTATION

DOCUMENT NAME	DESCRIPTION
COVER LETTER	Listing of Beneficial Owner information. (ESP GENERATED)
CERTIFICATE OF RESIDENCY	Must be for the same tax year of the dividend and must bear an issuance date prior to the pay date. This form is only required if the Local Tax Authority of the beneficial owner does not sign the appropriate section of the CBDIV21.
CBDIV21	Request for the application of the reduced Withholding Tax on dividends distributed by Italian companies. The "BENEFICIAL OWNER" section of Form CBDIV21 must contain an ORIGINAL signature from the beneficial owner as well as an ORIGINAL signature and stamp of the DTC participant. (ESP GENERATED)
ANNEX B	Form used for Tax Exempt Entities wishing to assert Treaty Benefits.
APPENDIX US GROUP TRUST	Letter of confirmation for Beneficial Owners submitted under a US trust.
EU CORPORATE-CERTIFICATE OF RESIDENCY	Must be signed and stamped prior to pay date. This form can be replaced with an original COR for the tax year of the dividend provided that that form is dated prior to the pay date and mentions that the beneficial owner is subject to "Article 2 of Directive 90/435/EEC July 1990"
EU/EEA PENSION - CERTIFICATE OF RESIDENCY	Must be signed and stamped prior to pay date. This form can be replaced with an original COR for the tax year of the dividend provided that that form is dated prior to the pay date and mentions that the beneficial owner is subject to "Article 1 of Directive 95/208/EEC September 1973"
IRS FORM 6166	Must be certified for the tax year of the dividend, bear an issuance date prior to the local pay date, and contain the wording "...for purposes of U.S. taxation".
LIMITED POWER OF ATTORNEY	If the POA is signed by the Broker, a copy of trust agreement or notarized limited POA must also be submitted
APPENDIX A	List of countries where corporate entities may benefit from the application of the 1.20% Italian withholding tax rate, and pensions may benefit from the application of the 11%

APPENDIX US PARTNERSHIP CBDIV-SELF DECLARATION	Letter of confirmation for Beneficial Owners submitted under a US partnership.
EU UCITS EXEMPTION ATTESTATION	Request to be submitted by collective investment vehicles (civs) established in EU or EEA countries which allow for an adequate exchange of information to the purpose of the exemption from withholding tax on dividends distributed by Italian companies and capital gains arising from the disposal of Italian shares, either listed or not, representing a substantial participation.
***In scenarios where a legal representative is signing documentation a Power of Attorney is also required. Should the POA be signed by a broker a copy of a trust agreement or limited POA between the broker and beneficial owner must ALSO be provided	

ESP

Citibank 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 Citibank and creates applicable documentation on the Participant's behalf.

Submit the data online through the web site below, print out the document 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	
PRIMARY CONTACT	DYLAN WALTERS
DOMESTIC PHONE (U.S.)	1-800-628-4646
DOMESTIC FAX (U.S.)	1-800-633-4646
EMAIL ADDRESS	ITALYESP@GLOBETAX.COM
COMPANY	GLOBETAX SERVICES INC.
STREET ADDRESS	ONE NEW YORK PLAZA, 34 TH FLOOR
CITY/STATE/ZIP	NEW YORK, NY 10004
ADDITIONAL CONTACTS	JOE HANDS

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.

FREQUENTLY ASKED QUESTIONS (FAQs)

GENERAL QUESTIONS

How do I obtain the required documentation for long form reclaims?	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.
Will Citibank/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 Citibank/GlobeTax an optional process?	Yes , this is a discretionary, optional service.
If a signature cannot be obtained from the beneficial owner, what is an alternative?	A representative may sign on their behalf if a notarized ORIGINAL Power of Attorney signed by the beneficial owner to the entity signing on their behalf is provided. Alternatively, a notarized copy of EITHER a Power of Attorney (POA), a Trust Agreement, or a Custody Agreement signed by the beneficial owner to the entity signing on their behalf can be supplied along with an ORIGINAL Self-Certified Power of Attorney, printed on the letterhead of the signing entity authorized. The Self-Certified POA should be signed by the individual who will be signing the forms on the beneficial owner's behalf.

FORMS AND ATTACHMENTS

**Double click on respective icon to view attachment.*

EU UCITS EXEMPTION ATTESTATION



EU UCITS
EXEMPTION ATTESTATION