

B #:	10562-19			
Date:	May 9, 2019			
То:	ll Participants			
Category:	Dividends			
From:	International Services			
Attention:	Operations, Reorg & Dividend Managers, Partners & Cashiers			
	Tax Relief Country: Ireland			
	Security: Allergan PLC			
	CUSIP: G0177J108			
Subject:	<b>Record Date:</b> 05/14/2019			
	<b>Payable Date:</b> 06/14/2019			
	Relief at Source CA Web Cut-Off: 6/3/2019 8:00 P.M. E.T			
	Quick Refund CA Web Cut-Off: 6/24/2019 8:00 P.M. E.T			

Participants can use DTC's Corporate Action 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 +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.





**ALLERGAN PLC** has announced a cash dividend on its ordinary shares. Computershare, Inc. acts as the US Transfer Agent.

Participants can use DTC's Corporate Actions Web (CA Web) instructions tab to certify all or a portion of their position as being entitled to the applicable withholding tax rate. Use of these instruction methods will permit the withholding tax rate to which a beneficial owner is entitled to be applied to amounts paid through DTC. By electing, Participants agree to the Warning and Disclaimer on page 2.

All supporting documentation for exempt elections must be provided to GlobeTax acting on behalf of Computershare Investor Services (Ireland) Limited, the qualifying intermediary for **ALLERGAN PLC** (the "QI"), by the applicable deadline stated on page 2.

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DIVIDEND EVENT DETAILS			
COUNTRY OF ISSUANCE	IRELAND		
ISSUE	ALLERGAN PLC		
CUSIP#	G0177J108		
UNDERLYING ISIN	IE00BY9D5467		
US TRANSFER AGENT	COMPUTERSHARE, INC.		
QI	COMPUTERSHARE INVESTOR SERVICES (IRELAND) LIMITED		
RECORD DATE	MAY 14, 2019		
PAY DATE	JUNE 14, 2019		
GROSS DIVIDEND RATE ON PAY DATE	\$0.74		
STATUTORY WITHHOLDING RATE	20%		
XBRL	NOT AVAILABLE		

By participating in the DTC CA Web process, Participants agree to comply with all audit requests made by the Irish Revenue Commissioners within twenty-one days of notification.

Note: the terms for dividend withholding tax exemption outlined throughout this notice apply to the current dividend with record date May 14, 2019. Future dividends may be subject to different requirements that will be outlined in subsequent important notices.

FEES & DEADLINES							
FILING METHOD	ВАТСН	PAYMENT METHOD	SHARE MINIMUM	CUSTODIAL FEE	DSC FEE	MINIMUM FEE PER BENEFICIAL OWNER	FINAL SUBMISSION DEADLINE
RELIEF AT SOURCE	PAYMENT ON PAY DATE	DTC	N/A	N/A	N/A	\$0	JUNE 3, 2019 8:00 P.M. ET
QUICK REFUND	JULY 1, 2019	DTC	N/A	N/A	N/A	\$0	JUNE 24, 2019 8:00 P.M. ET
LONG FORM	POST-CA WEB PROCESS; ONGOING	CHECK/ACH	N/A	N/A	UP TO \$0.01 PER SHARE	\$25.00	DECEMBER 1, 2023

## **WARNING AND DISCLAIMER:**

THE INFORMATION AND DATA CONTAINED IN THIS NOTICE IS BASED ON INFORMATION OBTAINED FROM MULTIPLE SOURCES BELIEVED TO BE RELIABLE. HOWEVER, COMPUTERSHARE 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 AND SUBJECT TO DISCRETION AND/OR PRE-EMPTION BY LOCAL MARKET RULES, PRACTICES OR ACTIONS TAKEN BY NON-US 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.

ELIGIBILITY MATRIX – RELIEF AT SOURCE / QUICK REFUND						
RATE DESCRIPTION	RECLAIM RATE	ELIGIBLE RESIDENTS		DOCUMENTATION REQUIRED	SIGNATURE REQUIRED	
EXEMPT U.S. 0%	20%	QUALIFYING U.S. ENTITIES WITH A VERIFIED U.S. ADDRESS		NONE	N/A	
RESIDENTS OF RELEVANT TERRITORIES (OTHER THAN THE U.S.) 0%	20%		1.		1. YES – DTC PARTICIPANT 2. YES – BENEFICIAL OWNER	
OTHER ELIGIBLE ENTITIES 0%	20%	A COMPANY THAT IS RESIDENT OUTSIDE OF THE RELEVANT TERRITORIES BUT IS CONTROLLED BY A PERSON OR PERSONS THAT IS OR ARE RESIDENT IN A RELEVANT TERRITORY OR BY A COMPANY THAT IS SUBSTANTIALLY AND REGULARLY TRADED ON A RECOGNIZED STOCK EXCHANGE IN A RELEVANT TERRITORY			YES – DTC PARTICIPANT     YES – BENEFICIAL OWNER	
EXEMPT ELIGIBLE IRISH ENTITIES 0%	20%	IRISH RESIDENT COMPANIES, PENSION SCHEMES, QUALIFYING EMPLOYEE SHARE OWNERSHIP TRUSTS, COLLECTIVE INVESTMENT UNDERTAKINGS OR CHARITIES		COVER LETTER COMPOSITE RESIDENT V3 FORM	YES – DTC PARTICIPANT     YES – BENEFICIAL OWNER	

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

ELIGIBILITY MATRIX – LONG FORM						
RATE DESCRIPTION	RECLAIM RATE	ELIGIBLE RESIDENTS	DOCUMENTATION REQUIRED SIGNATURE REQUIRED			
EXEMPT U.S. 0%	20%	QUALIFYING U.S. ENTITIES WITH A VERIFIED U.S. ADDRESS (CLAIMED UNFAVORABLE THROUGH CA WEB)	<ol> <li>COVER LETTER</li> <li>DTC PARTICIPANT POWER OF ATTORNEY</li> <li>YES – DTC PARTICIPANT</li> <li>YES – DTC PARTICIPANT</li> </ol>			
EXEMPT RESIDENTS OF RELEVANT TERRITORIES 0%	20%	ALBANIA, ARMENIA, AUSTRALIA, AUSTRIA, BAHRAIN, BELARUS, BELGIUM, BOSNIA & HERZEGOVINA, BOTSWANA, BULGARIA, CANADA, CHILE, CHINA, CROATIA, CYPRUS, CZECH REPUBLIC, DENMARK, EGYPT, ESTONIA, ETHIOPIA, FINLAND, FRANCE, GEORGIA, GERMANY, GHANA, GREECE, HONG KONG, HUNGARY, ICELAND, INDIA, ISRAEL, ITALY, JAPAN, KAZAKHSTAN, KOREA, REPUBLIC OF (SOUTH), KUWAIT, LATVIA, LITHUANIA, LUXEMBOURG, MACEDONIA, MALAYSIA, MALTA, MEXICO, MOLDOVA, MONTENEGRO, MOROCCO, NETHERLANDS, NEW ZEALAND, NORWAY, PAKISTAN, PANAMA, POLAND, PORTUGAL, QATAR, ROMANIA, RUSSIA, SAUDI ARABIA, SERBIA, SINGAPORE, SLOVAK REPUBLIC, SLOVENIA, SOUTH AFRICA, SPAIN, SWEDEN, SWITZERLAND, THAILAND, THE REPUBLIC OF TURKEY, UKRAINE, UNITED ARAB EMIRATES, UNITED KINGDOM, UZBEKISTAN, VIETNAM, ZAMBIA	<ol> <li>COVER LETTER</li> <li>DTC PARTICIPANT POWER OF ATTORNEY</li> <li>DIVIDEND WITHHOLDING TAX REFUND CLAIM FORM</li> <li>NON-RESIDENT V2 FORM</li> <li>YES – DTC PARTICIPANT OR FINAL BENEFICIAL OWNER</li> <li>YES – DTC PARTICIPANT OR FINAL BENEFICIAL OWNER</li> <li>OWNER</li> <li>OWNER</li> </ol>			
OTHER ELIGIBLE ENTITIES 0%	20%	A COMPANY THAT IS RESIDENT OUTSIDE OF THE RELEVANT TERRITORIES BUT IS CONTROLLED BY A PERSON OR PERSONS THAT IS OR ARE RESIDENT IN A RELEVANT TERRITORY OR BY A COMPANY THAT IS SUBSTANTIALLY AND REGULARLY TRADED ON A RECOGNIZED STOCK EXCHANGE IN A RELEVANT TERRITORY	2. DTC PARTICIPANT POWER OF ATTORNEY  3. YES – DTC PARTICIPANT OR FINAL BENEFICIAL			
EXEMPT ELIGIBLE IRISH ENTITIES 0%	20%	IRISH RESIDENT COMPANIES, PENSION SCHEMES, QUALIFYING EMPLOYEE SHARE OWNERSHIP TRUSTS, COLLECTIVE INVESTMENT UNDERTAKINGS OR CHARITIES	1. COVER LETTER 2. DTC PARTICIPANT POWER OF ATTORNEY 3. COMPOSITE RESIDENT V3 FORM  1. YES – DTC PARTICIPANT 2. YES – DTC PARTICIPANT 3. YES – FINAL BENEFICIAL OWNER			
	Note: All documents listed in BLUE font are generated by GlobeTax's ESP website after submission of beneficial owner data.					

DESCRIPTION OF VARIOUS DOCUMENTATION				
DOCUMENT NAME	DESCRIPTION	ORIGINAL / COPY		
COVER LETTER (APPENDIX A)	Cover letter required for all At-Source claims.	ORIGINAL		
DIVIDEND WITHHOLDING TAX REFUND CLAIM FORM	Claim for repayment of Irish tax on dividends form. This form needs to be certified by the beneficial owner's local tax office for non-U.S. entities.	ORIGINAL		
NON-RESIDENT V2 FORM ( <u>V2A</u> , <u>V2B</u> , <u>V2C</u> )	Irish dividend withholding tax exemption declaration form for non-U.S. relevant territory beneficial owners. This form needs to be certified by the beneficial owner's local tax office for non-U.S. entities.	COPY		
COMPOSITE RESIDENT <u>V3</u> FORM	Irish dividend withholding tax exemption declaration form for eligible Irish beneficial owners.	COPY		
BENEFICIAL OWNER POWER OF ATTORNEY	A document issued by the beneficial owner to the DTC Participant if the Participant is signing the Dividend Withholding Tax Refund Claim Form or Non-Resident V2 form on behalf of the beneficial owner. This document must be on the beneficial owner's letterhead.	СОРҮ		
DTC PARTICIPANT POWER OF ATTORNEY	A document issued by the DTC Participant to the Transfer Agent authorizing the Transfer Agent to file the long form reclaim and receive payment on the Participant's behalf. This document must be on the DTC Participant's letterhead.	COPY		
EXCEL SPREADSHEET	Beneficial Owner breakdown to be included with submissions exceeding five beneficial owners.	COPY		
ELIGIBILITY MATRIX	Description/Clarification of eligibility for varies investor types and special circumstances.	N/A		

CONTACT DETAILS			
PRIMARY CONTACT	EMILIE KOZOL		
PHONE	1-212-747-9100		
FAX	1-212-747-0029		
EMAIL ADDRESS	EMILIE_KOZOL@GLOBETAX.COM		
GROUP EMAIL	IRELANDESP@GLOBETAX.COM		
COMPANY	GLOBETAX SERVICES INC.		
STREET ADDRESS	ONE NEW YORK PLAZA - 34TH FLOOR		
CITY/STATE/ZIP	NEW YORK, NY 10004		
ADDITIONAL CONTACTS	BROOKS ROBINSON		





Computershare offers ESP powered by GlobeTax, which allows for the secure and simplified transfer of beneficial owner level data from the Participant to Computershare, and creates applicable documentation on the Participant's behalf.

These claims should be submitted through the following website (requires a one-time registration):

https://ESP.GlobeTax.com

Please contact <a href="mailto:support@globetax.com">support@globetax.com</a> at 212-747-9100 if you have any questions about this process.

FREQUENTLY ASKED QUESTIONS (FAQs)				
What is the difference between the V2 forms A, B, and C and which one needs to be completed?	The V2 forms A, B, and C each pertain to different types of beneficial owners and should be selected based on the final beneficiary. Qualifying non-resident individuals must use the V2A, qualifying non-resident companies must use the V2B, and all other qualifying non-resident persons (not being an individual or a company) must use the V2C.			
Can non-U.S. financial institutions benefit from Relief At-Source for their underlying holders?	To be eligible to reclaim through Relief At Source or Quick Refund all institutions involved in the payment between DTC and the final beneficial owner (not including the final BO) must be an Irish Qualified Intermediary (QI) or domiciled in the United States. If one of more of the institutions are not an Irish QI and are outside of the U.S., exemption cannot be applied At Source.  For example, if the DTC participant is a Canadian Bank without Irish QI status they cannot participate in Relief At Source or Quick Refund. However, the beneficial owner may still be eligible to reclaim through the long form process - requirements described above.			
Can 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 be accompanied by the trust agreement.			
How long does it take for long-form claims to be paid?	We estimate it takes 4 months for long form claims to be paid.			
Does the long-form process have a minimum position requirement per beneficial owner?	No, there is a minimum fee of \$25 per beneficial owner 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.			
What is the statute of limitations for filing Irish reclaims?	It is 4 years from the end of the year in which the dividend is paid. Claims received after our submission deadline will be filed in good faith.			
What happens if the participant does not make a CA web election within the specified CA web election window?	All shares will be withheld at the 20% tax rate. You will have an opportunity to file long form if this transpires.			
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.			

FORMS AND ATTACHMENTS  *Double Click on respective icon to view					
APPENDIX A – AT-SOURCE COVER LETTER  **For Non-ESP users ONLY	EXCEL SPREADSHEET  **For Non-ESP users ONLY	ELIGIBILITY MATRIX – INVESTOR TYPE			
Appendix A.pdf	Microsoft Excel Worksheet	Eligibility Matrix.pdf			