



*Important Notice*  
The Depository Trust Company

<b>B #:</b>	9474-18
<b>Date:</b>	October 2, 2018
<b>To:</b>	All Participants
<b>Category:</b>	Dividends
<b>From:</b>	International Services
<b>Attention:</b>	Operations, Reorg & Dividend Managers, Partners & Cashiers
<b>Subject:</b>	<b><u>Tax Relief</u></b> – Country: RUSSIAN FEDERATION <b>Issue Name:</b> PJSC CHERKIZOVO GROUP – 144A CUSIP: 164145104 <b><u>Record Date:</u></b> 10/09/2018 <b><u>Payable Date:</u></b> TBD <b><u>CA Web Instruction Deadline</u></b> : 10/12/2018 8:00 P.M. ET. <b><u>QUICK REFUND CA Web Instruction Deadline:</u></b> 11/20/2018 8:00 P.M. ET.

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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Non-Confidential





**PJSC CHERKIZOVO GROUP - 144A** has announced a dividend and BNY Mellon acts as Depository for the Depository Receipt (“DR”) program.

Participants can use DTC’s Corporate Action Web (“CA Web”) instructions tab to certify all or a portion of their position entitled to the applicable rate as per Double Tax Treaty (“DTT”) and Russian Tax Rate. Use of CA Web will permit entitlement amounts to be paid through DTC. By electing, Participants agree to the Agreements, Fees, Representations and Indemnification and Deadlines below.

On DR Pay Date, holders **that disclose summary beneficial owner information may be eligible** to receive the applicable rate as per a relevant DTT or the 15% statutory withholding rate. All non-disclosed holders will receive this dividend net of a maximum 15% withholding rate; however, consequences of non-disclosure are unclear and Participants and holders will bear all risk and responsibility in relation thereto.

The summary disclosure requirements are country of tax residency, entity type by individual or legal, and number of DRs held.

DIVIDEND EVENT DETAILS	
COUNTRY OF ISSUANCE	RUSSIAN FEDERATION
ISSUE	PJSC CHERKIZOVO GROUP - 144A
CUSIP#	164145104
UNDERLYING ISIN	RU000A0JL4R1
DEPOSITARY	BNY MELLON
DR RECORD DATE	OCTOBER 09, 2018
DR PAY DATE	TBD
RATIO (DR to ORD)	3:2
ORD GROSS DIV. RATE	RUB20.48
STATUTORY WITHHOLDING RATE	15.00%
	DOUBLE CLICK ICON BELOW TO DOWNLOAD 

**PLEASE NOTE THAT THERE IS THE POTENTIAL FOR AUDIT ON YOUR DISCLOSED DRs BY THE RUSSIAN TAX AUTHORITIES**

The Russian tax authorities may audit the electing participants and their beneficial owner clients who elect DTT rate and potentially those receiving the statutory rate for up to three calendar years after the dividend payment.

For those who elect for DTT rate benefits, at a minimum, audits are expected to require an original of the Certificate of Residency (“COR”) for tax residency with specific language as to the DTT between the country of residence and the Russian Federation. These forms, and translations into Russian if in a foreign language, will each need to be apostilled, legalized or notarized (as applicable). The Ministry of Finance has indicated, via Letter No. 03-08-R3/27274 to the Federal Tax Administration of Russia on June 5, 2014<sup>1</sup>, that the COR is required for preparation of the withholding tax election based on a DTT rate.

Once an audit request has been made, there is expected to be a three (3) month period to provide audit documentation to the Russian tax authorities with the possibility of a three (3) month extension. Please note the Russian tax authorities maintain the right to request additional information and/or forms at any time and from time to time. It should also be noted that the Russian Tax Code does not provide any guidance to the documents that may be regarded as proper identification documentation. Participants and beneficial owners will be responsible and liable for any tax relief and for maintenance and provision of all supporting materials at all times, including in the event of an audit.

Please note, this notice should not be construed nor represents BNY Mellon providing any legal, tax, accounting or other professional advice on these matters. You should seek advice from an independent tax advisor.

<sup>1</sup> Ministry of Finance of the Russian Federation. 2014. Letter No. 03-08-R3/27274 of the Ministry of Finance of the Russian Federation of 5 June 2014. [ONLINE – Russian Only] Available at: <http://www.minfin.ru/common/upload/library/2014/06/main/03-08-RZ27274.pdf>. [Accessed 11 June 14].

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### FEES & DEADLINES

FILING METHOD	BATCH	PAYMENT METHOD	TAX RELIEF FEE	FINAL SUBMISSION DEADLINE (ESP)
<b>RELIEF AT SOURCE</b>	PAYMENT ON DR PAY DATE	VIA DTC	UP TO \$0.005 PER DR	10/12/2018 8:00 P.M. EST
<b>QUICK REFUND</b>	IMMEDIATELY FOLLOWING DR PAY DATE	VIA DTC	UP TO \$0.005 PER DR	11/20/2018 8:00 P.M. EST

**Agreements, Fees, Representations and Indemnification from Participants and Beneficial Owners**

We hereby agree that this tax relief assistance service is wholly voluntary and discretionary and outside the terms and conditions of any applicable deposit agreement. BNY Mellon 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 Mellon of up to \$0.005 per Depository Receipt for Relief at Source or Quick Refund, and any other charges, fees or expenses payable by or due to BNY Mellon or its agents, including any 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 Mellon’s 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 Mellon may be shared with its agents and affiliates.

We hereby agree that in addition to statutory and documentation requirements, and the deduction of fees, tax relief benefits will be subject to review and approval, and subsequent audits by the Russian custodian and Russian tax regulators, and that BNY Mellon 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, and should seek advice based upon their own particular circumstances from an independent tax advisor.

We certify that to the best of our knowledge each of the beneficial owners identified are eligible for the relevant statutory or DTT withholding tax rate 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 and have obtained required supporting documents including certificates of tax residency (translated to Russian, apostilled or legalized or notarized).

We will be fully liable for any and all claims, penalties and / or interest, including without limitation, any foreign exchange fluctuations associated therewith. BNY Mellon shall not be liable for the failure to secure any tax relief. We expressly agree that BNY Mellon and its agents or affiliates shall not have any liability for, and we shall indemnify, defend and hold each of BNY Mellon 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.

## ELIGIBILITY MATRIX – RELIEF AT SOURCE/QUICK REFUND

RATE DESCRIPTION	RECLAIM RATE	ELIGIBLE RESIDENTS		DOCUMENTATION REQUIRED
<b>EXEMPT - 0%</b>	15%	<p style="text-align: center;">RUSSIAN UNIT INVESTMENT TRUSTS</p> <p style="text-align: center;">SUPRANATIONAL / WORLD EXEMPT ENTITY</p> <p style="text-align: center;">SOVEREIGN / GOVERNMENT ENTITY</p> <p><b>NOTE:</b> SOVEREIGN AND / OR SUPRANATIONAL ENTITIES ARE GRANTED EXEMPTION ON A CASE BY CASE BASIS AT THE DISCRETION OF THE RUSSIAN CUSTODIAN BANK OR ISSUER. ACCORDINGLY, NEITHER GLOBETAX NOR THE DEPOSITARY CAN ENSURE EXEMPTION WILL BE GRANTED. THESE ENTITIES MUST BE DISCLOSED AT THE BENEFICIAL OWNER LEVEL.</p>		<ol style="list-style-type: none"> <li>1. <a href="#">COVER LETTER</a> – SCANNED COPY</li> <li>2. <a href="#">SUMMARY</a></li> <li>3. EXHIBIT C – CONDITIONAL RATE REQUEST</li> </ol>
<b>DTT - 5%</b>	10%	DISCLOSED AND APPLYING FOR THE DTT RATE OF:	KUWAIT, QATAR, SAUDI ARABIA	<ol style="list-style-type: none"> <li>1. <a href="#">COVER LETTER</a> – SCANNED COPY</li> <li>2. <a href="#">SUMMARY</a></li> </ol>
<b>DTT - 10%</b>	5%	DISCLOSED AND APPLYING FOR THE DTT RATE OF:	<p style="text-align: center;">ALBANIA, ARMENIA, AZERBAIJAN, BELGIUM, BOSTWANA, CHILE, CHINA, CROATIA, CYPRUS, CZECH REPUBLIC, DENMARK, EGYPT, GREECE, HONG KONG, HUNGARY, INDIA, IRAN, IRELAND, ISRAEL, ITALY, KAZAKHSTAN, DEMOCRATIC PEOPLE’S REPUBLIC OF KOREA, REPUBLIC OF KOREA, KYRGYZSTAN, LATVIA, LEBANON, LITHUANIA, MACEDONIA, MALTA, MEXICO, MOLDOVA, MONGOLIA, MOROCCO, NAMIBIA, NORWAY, POLAND, SINGAPORE, SLOVAKIA, SLOVENIA, TAJIKISTAN, TURKEY, TURKMENISTAN, UNITED KINGDOM, UNITED STATES OF AMERICA, UZBEKISTAN</p>	<ol style="list-style-type: none"> <li>1. <a href="#">COVER LETTER</a> – SCANNED COPY</li> <li>2. <a href="#">SUMMARY</a></li> </ol>
<b>DTT- 12%</b>	3%	DISCLOSED AND APPLYING FOR THE DTT RATE OF:	FINLAND	<ol style="list-style-type: none"> <li>1. <a href="#">COVER LETTER</a> – SCANNED COPY</li> <li>2. <a href="#">SUMMARY</a></li> </ol>
<b>RUSSIAN TAX RATE - 13%</b>	2%	DISCLOSED AND APPLYING FOR THE TAX RATE OF:	RUSSIAN FEDERATION	<ol style="list-style-type: none"> <li>1. <a href="#">COVER LETTER</a> – SCANNED COPY</li> <li>2. <a href="#">SUMMARY</a></li> </ol>
<b>DISCLOSED STATUTORY WITHHOLDING RATE - 15%</b>	0%	<p style="text-align: center;">DISCLOSED HOLDERS OF DTT COUNTRIES NOT APPLYING FOR DTT RATES</p> <p style="text-align: center;">OR</p> <p style="text-align: center;">DISCLOSED HOLDERS OF NON DTT COUNTRIES</p>		<ol style="list-style-type: none"> <li>1. <a href="#">COVER LETTER</a> – SCANNED COPY</li> <li>2. <a href="#">SUMMARY</a></li> </ol>

<b>NON-DISCLOSURE/ STATUTORY WITHHOLDING RATE- 15%</b>	0%	NON-DISCLOSED HOLDERS	*NONE
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\*Note: All documents listed in **BLUE font** are generated by GlobeTax's ESP website after submission of beneficial owner data.

**\*Non-disclosure is not permitted under the Russian tax regulations and the consequences are unclear. Participants and holders will bear all risk and responsibility if summary disclosure is not obtained and retained in support of the statutory rate.\***

Note: There are some countries with double taxation treaties with the Russian Federation that have multiple withholding rates. The lower reclaim rate applies to the Relief at source and quick refund process. The higher reclaim rates generally apply to conditional situations (i.e. holding a minimum amount of outstanding shares or a special entity type). For more information please contact GlobeTax.

## PROCESS STEPS

- Go to <https://esp.globetax.com/> and disclose your ultimate beneficial owners by
  - Country of Tax Residence
  - Entity Type (either legal entity or individual)
- Sign the ESP generated cover letter and summary and email a scanned copy to GlobeTax
- Use the ESP generated share summary at applicable rate as per treaty to complete your withholding rate certification at DTC's CA Web

**IMPORTANT: TO RECEIVE YOUR DIVIDEND WITH APPLICABLE RATE AS PER TREATY YOU MUST BOTH COMPLETE THE DISCLOSURE TO GLOBETAX AND A CORRESPONDING CA WEB CERTIFICATION AT DTC.**

## CONTACT DETAILS

<b>PRIMARY CONTACT</b>	NICOLE BRODIE
<b>INTERNATIONAL PHONE</b>	1-800-915-3536
<b>INTERNATIONAL FAX</b>	1-800-985-3536
<b>DOMESTIC PHONE (U.S.)</b>	1-212-747-9100
<b>DOMESTIC FAX (U.S.)</b>	1-212-747-0029
<b>GROUP EMAIL</b>	<a href="mailto:RUSSIAESP@GLOBETAX.COM">RUSSIAESP@GLOBETAX.COM</a>
<b>COMPANY</b>	GLOBETAX SERVICES INC.
<b>STREET ADDRESS</b>	ONE NEW YORK PLAZA, 34 <sup>TH</sup> FLOOR
<b>CITY/STATE/ZIP</b>	NEW YORK, NY 10004
<b>ADDITIONAL CONTACTS</b>	DIANA CAMEJO

# ESP

powered by **GLOBETAX**

BNY Mellon 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 BNY Mellon and creates applicable documentation on the Participants behalf.

Submit the data online through the web site below, print out the document on letterhead, sign, and email a scanned copy to GlobeTax.

These claims should be submitted through the following web site. (Requires a one-time registration) <https://ESP.GlobeTax.com>

Please contact [support@globetax.com](mailto:support@globetax.com) at 212-747-9100 if you have any questions about this process.




## FREQUENTLY ASKED QUESTIONS (FAQs)

<p><b>Do I need to provide a certificate of residency (“COR”)?</b></p>	<p>For relief at source and quick refund processes, the ESP generated forms will be required at the time of election. However, CORs will be required in the event of an audit for those disclosing for treaty benefits and you will be liable to maintain and provide these in that event. It is expected that CORs must be translated into Russian and apostilled, legalized or notarized and that they must be issued as of the calendar year.</p>
<p><b>Is it required to use ESP to disclose?</b></p>	<p>If you are not able to utilize the ESP system please contact GlobeTax to obtain copies of the ESP forms to submit manually.</p>
<p><b>Why should I complete the ESP disclosure before elections at DTC?</b></p>	<p>The ESP system will provide clients with an aggregate of their disclosed DRs by withholding maximum tax treaty and statutory rate. This information should be used to make your DTC elections by withholding rate as per treaty.</p>
<p><b>Is there a difference between the relief at source and quick refund?</b></p>	<p>The process steps are the same for both processes. However, the relief at source period is shorter and involves payment of your dividend with tax relief on pay date. The quick refund is a longer period for submission and will involve payment of your tax relief after pay date. Both payments are electronic.</p>
<p><b>Is there opportunity for standard refund?</b></p>	<p>At this time there is no defined standard refund. Please contact GlobeTax for additional information.</p>
<p><b>Is it possible for me to disclose ownership of the DRs for 15% withholding even if the country of tax residence has a DTT?</b></p>	<p>Yes. You may indicate the shares by country of residence to disclose ownership residency but not obtain treaty benefits.<sup>2</sup></p>
<p><b>Can residents of a DTT country with an entity type considered transparent disclose their DRs to receive the dividend at the double tax treaty rate?</b></p>	<p>The DRs of transparent entities should be disclosed at the ultimate beneficial holder level. Always check the specifics of the relevant tax treaty to ensure you are properly disclosing the DRs of the entity and country of tax residence with respect to the Russian Federation.</p>
<p><b>Will BNY Mellon/GlobeTax accept claims filed directly to them by beneficial owners?</b></p>	<p>BNY Mellon/GlobeTax only accepts claims filed by the DTC Participant who held the securities through DTC and only to the extent that the DTC has reported these holdings to us as valid.</p>
<p><b>Why is the summary disclosure required if the 15% statutory rate will apply for disclosed or undisclosed positions?</b></p>	<p>Russian regulations (Law 39-FZ) require disclosures on all positions regardless of benefit and according BNY Mellon is required to request the summary disclosure. Consequences of non-disclosure are unclear and participants and holders will bear all risk and responsibility in relation thereto.</p>

<sup>2</sup>Ministry of Finance of the Russian Federation. 2014. Letter No. 03-08-R3/27274 of the Ministry of Finance of the Russian Federation of 5 June 2014. [ONLINE – Russian Only] Available at: <http://www.minfin.ru/common/upload/library/2014/06/main/03-08-RZ27274.pdf>. [Accessed 11 June 14].

## FORMS AND ATTACHMENTS

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

COVER LETTER <i>**For Non-ESP users ONLY</i>	COVER LETTER EXCEL BREAKDOWN <i>**For Non-ESP users ONLY</i>	CONDITIONAL RATES BREAKDOWN
 BNYM Cover Letter	 Exhibit B	 Exhibit C

### **Warning and Disclaimer:**

BNY Mellon 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 Mellon 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 Mellon 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 Mellon 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.