

WITHHOLDING TAX UPDATE

September 2019



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As we leap into the Fall season and head towards the final quarter of the year, we have some year-end updates to share.

This edition of the Withholding Tax Update Newsletter covers our pioneering 'One Important Notice' concept, introduces our newest market, Slovenia, showcases emerging reclaim opportunities in Spain, and concludes with our year-end statute of limitations deadlines matrix. Check out the grid to ensure you don't miss any reclaim opportunities!

Best,

Joe Hands
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Withholding Tax Update

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GLOBETAX

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1 GlobeTax Debuts 'One Important Notice' Concept

We are excited to announce GlobeTax's 'One Important Notice' concept, which debuted in June with Japanese securities.

This pioneering concept combines events across depository banks that share record dates and documentation requirements.

Starting with B# 10584-19, published June 24, DTC Participants no longer need to read ~200 unique Important Notices during busy Japanese tax relief cycles. Provided GlobeTax doesn't receive late announcements, Participants can access all required information on six Important Notices maximum. Consider it a 33-for-1 special!

Each Notice features a dividend event matrix, which lists all relevant CUSIPs for each cycle per sponsoring depository.

The process to access Important Notices will remain unchanged; simply search for a single event on ESP or CA Web.

Keep a lookout for additional announcements as we roll out the "One Important Notice" concept to new markets.

DTCC | *Important Notice*
The Depository Trust Company

B #:	10584-19
Date:	June 24, 2019
To:	All Participants
Category:	Dividends
From:	International Services
Attention:	Operations, Reorg & Dividend Managers, Partners & Cashiers
Subject:	Tax Relief Country: Japan CUSIPs: 037400108, 043388107, 171269103, 249034109, 45790H101, 48881R103, 50127R103, 69907K105, 825384209, 86558P109, 891493306 Record Date: 6/28/2019 Payable Date: TBD CA Web Cutoff Date: 7/19/2019 Depository for Un-sponsored DR Program: Deutsche Bank

ISSUE	CUSIP#
AOZORA BANK LTD	037400108
ASAHI GROUP HOLDINGS LTD	043388107
CHUGAI PHARMACEUTICAL CO LTD	171269103
DENTSU INC	249034109
INFEX CORPORATION	45790H101
KENEDIX INC	48881R103
KURARAY	50127R103
PAN PACIFIC INTERNATIONAL HOLDINGS	69907K105
SHOWA DENKO	825384209
SUMCO	86558P109
TOSHIBA CORP	891493306

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.

DTCC offers enhanced access to all important notices via a Web-based subscription service. The notification system leverages RSS feeds, providing significant benefits including real-time updates and customizable delivery. To learn more and to set up your own DTCC RSS alert, visit http://www.dtcc.com/subscription_form.php

Non confidential

Spain to Introduce Exempt Rate for U.S. Pensions

U.S. Pension funds will soon be entitled to exemption from withholding tax on Spanish dividend events under the updated US – Spain protocol.

Entering into force on November 27, 2019, the protocol will also entitle IRAs and 81-100 Group Trusts to seek withholding tax exemption. As a result, the majority of U.S.-domiciled pensions will be eligible to reclaim the full 19% tax levied on Spanish events.

The new measure came into the spotlight earlier this year when the U.S. Senate Foreign Relations Committee agreed to consider amendments to treaties with Switzerland, Luxembourg, Spain and Japan. The votes subsequently passed in July of 2019.

The addition of the exempt rate for U.S. Pensions in Spain will provide a significant benefit, as pensions were traditionally limited to reclaiming 4% on their dividends.

Participants should follow Spanish Important Notices for additional information regarding this change. Questions regarding the new exemption process may be directed to SpainESP@GlobeTax.com.

French Statutory Rate to Change to 28%

Effective January 1, 2020, the statutory withholding rate for French dividends will be reduced to 28% from the current 30%.

Any dividends with a local pay date in 2020, including events which go record at the end of 2019, will fall under the scope of the new statutory rate. The statutory rate of 12.8% will remain unchanged for individuals.

Participants are encouraged to pay special attention to the published notices for applicable rates and dividend details.

Please contact FranceESP@GlobeTax.com for questions.

Withholding Rate	Reclaim Rate
28.00%	0.00%
15.00%	13.00%
12.80%	15.20%
0.00%	28.00%

GlobeTax Announces End to 2018 Russian Audit

In early September, GlobeTax confirmed that the tax audit initiated in April 2018 by the Russian Inspectorate for record dates in 2016 and 2017 has officially closed.

At this point, no additional action or documentation is required for items under scope for this audit.

Please note that this announcement is only pertinent to the audit announced on May 21, 2018, where Sberbank acts as local custodian.

Questions regarding the Russian audit may be directed to RussiaESP@GlobeTax.com.



Hint #1 – No Important Notice? No problem!

Just because you don't see an Important Notice for an event doesn't necessarily mean that you can't initiate a claim for it.

For various reasons, GlobeTax does not publish Notices for every event. However, reclaim processes may still exist.

If you would like to reclaim for an event but don't see a Notice, please contact us about possibilities.

Hint #2 – Need to contact a market representative?

GlobeTax maintains email groups for every market we service. The groups usually combine the country name with 'ESP' (e.g. NorwayESP@GlobeTax.com) and represent the most efficient way to contact our market-specific operations teams. If you do not know the name of an email group, refer to the Important Notice.

Hint #3 – Did your DTC Participant's address change?

Remember to contact GlobeTax if you normally receive checks from us and your institution's mailing address and/or mailing attention has changed. We can thus ensure that our mailing addresses are up to date and we avoid sending checks to the wrong location.

To completely avoid the hassle of manual payments and paper checks, sign up for ACH payments. Contact us to learn more.



Norway: Luxembourg SICAVs Organized as UCITS Entitled to Exemption

GlobeTax has received confirmation from our local market partners that Luxembourg SICAVs organized as UCITS are entitled to exemption from withholding tax on Norwegian dividends.

Furthermore, it is understood that the Norwegian Tax Administration (NTA) has pre-approved these entities for tax exemption. As a result, a pre-approval letter or proof of payment letter issued by the NTA is NOT required to secure exemption. Rather, only the COR / UCITS attestation, beneficial owner certification, and EEA confirmation are required for this process. Except for the beneficial owner certification, these documents must be renewed every three years.

Future Norway Important Notices will be updated to reflect this information. Please contact NorwayESP@GlobeTax.com for further information.



Zdravo! Slovenia Becomes GlobeTax's Newest Market

GlobeTax broke into the Slovenian tax reclaim sphere this year, processing Nova Ljubljanska Banka's dividend event (RD: June 17, 2019) for both the Reg S (CUSIP: 66980N203) and 144A (CUSIP: 66980N104) programs. With the completion of this event, Slovenia has become the latest market opened by GlobeTax, following the introduction of Chile in 2018.

A seven day quick refund window was offered in June for investors to claim on this healthy 7.13 Euro per ordinary share dividend through either the double taxation treaty or via local Slovenian tax law. Certain legal entities domiciled in the European Economic Area (EEA) are entitled to exemption to the 25% statutory withholding rate. US based investors are entitled to the treaty rate of 15%.

Although the quick refund window closed on June 26, 2019, the opportunity to file long form reclaims remains open through September 2024. These events are GDRs, and can be filed through your respective ICSD.

Information regarding this process can be obtained by contacting SloveniaESP@GlobeTax.com.



End of Year Filing Deadlines Approaching

Mirroring our 4Q2018 newsletter, we are concluding this Withholding Tax Update by highlighting filing deadlines in markets with approaching statutes of limitations (SOL). Please see the chart below for upcoming cutoffs and action accordingly - it's now or never!

Country		Statute of Limitations (From end of year of local pay date)	Impacted Dividend Events (Local pay date year)	GlobeTax Deadline (2019)
	Portugal	2 years	2017	December 1
	France	2 years	2017	October 15*
	Switzerland	3 years	2016	December 1
	Belgium	4 years	2015	December 1
	Ireland	4 years	2015	December 1
	Germany	4 years	2015	November 29*
	Austria	5 years**	2014	December 1
	Norway	5 years	2014	October 15
	Sweden	5 years	2014	December 1
	Finland	5 years^	2014	October 31
	Netherlands	5 years	2014	October 31

*Additional or upfront fees may apply after the deadline.

**German residents are subject to a 4-year SOL deadline

^SOL in Finland has changed to 3 years (as of 2017). Dutch residents remain subject to the 5-year SOL rule.

Claims received after these deadlines will be treated on an 'in good faith' basis and are subject to rejection.

Please note that this table does not represent an exhaustive list of filing deadlines. Specific questions regarding deadlines should be directed to the relevant market representative.