Tax



## Italy: Reduced dividend withholding tax rate for non-resident corporations

Clearstream Banking<sup>1</sup> is pleased to inform customers that, for certain non-resident corporations, the withholding tax rate applied to income from Italian equities realised in 2008 and resulting in dividend payments in 2009 will be reduced.

With the approval of Financial Bill 2008, which will become effective when published in the "Gazzetta Ufficiale", the withholding tax rate on Italian dividends will be reduced for eligible beneficial owners as follows:

For ordinary shares: from 27% to 1.375%; and

For savings shares: from 12.5% to 1.375%.

Eligible beneficial owners are shareholders that are:

- · Subject to corporate income tax in their country of residence; and
- Resident in an EU member state or in a European Economic Area listed in a new "White List".

The new White List is not yet published but is expected to be issued by Ministerial Decree. Until such time as the new one is available, the White List published in Gazette N° 220 of 19 September 1996 and subsequently amended is to be used (see <u>"Appendix 1"</u> on page 2).

Further details concerning any changes in the process will be published as soon as available.

## **Further information**

For further information, please contact the Clearstream Banking Tax Help Desk:

	Frankfurt		
E-mail:	tax@clearstream.com		
Telephone:	+49-(0) 69-2 11-1 3821		
Fax:	+49-(0) 69-2 11-61 3821		

<sup>1.</sup> Clearstream Banking in this Announcement refers to Clearstream Banking Frankfurt (CBF). CBF is a Deutsche Börse Group company.

## Appendix 1. White List published in Gazette N° 220 of 19 September 1996

Albania	Estonia	Malta	South Korea
Algeria	Finland	Mauritius	Spain
Argentina	France	Mexico	Sri Lanka
Australia	Germany	Morocco	Sweden
Austria	Greece	Netherlands	Tanzania
Bangladesh	Hungary	New Zealand	Thailand
Belarus	India	Norway	Trinidad and Tobago
Belgium	Indonesia	Pakistan	Tunisia
Brazil	Ireland	Philippines	Turkey
Bulgaria	Israel	Poland	Ukraine
Canada	Ivory Coast	Portugal	United Arab Emirates
China	Japan	Romania	United Kingdom
Croatia	Kazakhstan	Russian Federation	United States of America
Czech Republic	Kuwait	Singapore	Venezuela
Denmark	Lithuania	Slovak Republic	Vietnam
Ecuador	Luxembourg	Slovenia	Yugoslavia
Egypt	Macedonia	South Africa	Zambia