One-Time Certification for taxable Czech Eurobonds issued as of 1 January 2022

Please mail the completed and signed certificate to:

Clearstream Services Prague Branch
Tax Services Prague
Futurama Business Park
Building B
Sokolovska 662/136b
18600 Prague 8
Czech Republic

Clearstream[1] account: _____ (the "Account")

We, the undersigned client of Clearstream, may hold from time to time in our securities Account securities issued by issuers organised, resident or incorporated in the Czech Republic (the "Securities").

We hereby certify that [*complete either Section 1. or Section 2. only and complete as appropriate*]:

☐   1. We hold or will hold in the Account Securities [*tick **one** box only and complete as appropriate*]:
    ☐   1.1 Exclusively for ourselves in our capacity of sole beneficial owner;

OR

    ☐   1.2 Exclusively for one single third party beneficial owner (excluding ourselves):

    Full name of beneficial owner:

    _____

    Residence for tax purposes (full address):

    _____

    AND

    We hereby certify that the single beneficial owner holding the Securities in the Account (meaning the above-mentioned third party or ourselves, as the case may be) is [*tick **one** box only and complete as appropriate*]:

    A.   A Czech tax resident who is (tick as applicable):

    ☐   An individual
    ☐   A legal entity

OR

    B.   A Czech tax non-resident (tick as appropriate):
    B.1.
        ☐   A qualifying tax non-resident
      OR
    B.2.   Not a qualifying tax non-resident and who:
      B.2.1.   Does not hold the Securities through a Czech permanent establishment and is a tax resident of (*tick **one** box as appropriate*):
        ☐   A Tax Treaty Country and is entitled to the benefits of the Tax Treaty
        ☐   A TIEA Country

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[1] Clearstream refers to (i) Clearstream Banking S.A. registered office at 42, avenue John F. Kennedy, L-1855 Luxembourg and registered with the Luxembourg Trade and Companies Register under number B-9248 and (ii) Clearstream Europe AG (for Clearstream Europe AG clients using Creation accounts) with registered office at Mergenthalerallee 61, 65760 Eschborn, Germany, and registered in Register B of the Amtsgericht Frankfurt am Main, Germany under number HRB 7500.

OR

B.2.2.   Holds the Securities through a Czech permanent establishment and is a tax resident of (*tick one box as appropriate*):

- An EU/EEA Country and is:
☐ An individual
☐ A legal entity

- A non EU/EEA Country and is:
☐ An individual
☐ A legal entity

We hereby undertake to provide Clearstream with a new One-Time Certificate if, on any record date, we hold any such Securities on behalf of multiple beneficial owners, excluding ourselves. We acknowledge that, in order to receive interest and/or dividend payments at the withholding tax rate mentioned above, we must provide Clearstream, within the applicable deadlines, with (a) valid relevant Beneficial Owner tax document(s) related to a given interest /redemption payment.

OR

☐ 2. We hold or will hold in the Account Securities for several third party beneficial owners (excluding ourselves).

We hereby undertake to provide Clearstream with a per-payment instruction, if applicable, via Swift (formatted MT565) or Xact Web Portal by each relevant interest / redemption payment date and the relevant Beneficial Owner document(s) related to a given interest/redemption payment.

We acknowledge and agree that it is the responsibility of beneficial owners that are residents of the Czech Republic and eligible to receive, through Clearstream, income payments without deduction or reduced rate of withholding tax to comply, through their annual fiscal declaration, with all legal and regulatory requirements imposed by Czech law in respect of withholding tax. Neither Clearstream nor its local depository have any direct or indirect liabilities towards the Czech Tax Authorities in this regard.

We irrevocably authorise Clearstream and its depository to submit this One-time Certificate or a copy hereof and any document submitted to Clearstream to the competent authorities, including the Czech Tax Authorities, in connection with any administrative or legal proceedings or official inquiries for which tax-related certificates are or would be relevant.

We hereby accept full responsibility in the event of any claims made:

i)   for additional taxes, interest thereon or penalties levied by the competent authorities in connection with any payments made in reliance upon this One-time Certificate and the relevant Beneficial Owner document(s) and therefore indemnify Clearstream in respect of any penalties, taxes and interest thereon levied by the competent Czech authorities; and

ii)   in respect of any other costs incurred in connection with any action taken in reliance upon the contents of this One-time Certificate, such as but not limited to any liability of Clearstream to the withholding tax administrator based on Clearstream's reliance upon the contents of this One-time Certificate.

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We understand that, in order to obtain any interest or dividend payment with respect to the Securities, either at a reduced withholding tax rate or exempt from withholding tax according either to a DTT concluded with the Czech Republic or to domestic legislation, it may be necessary for Clearstream to provide certain information to the Clearstream depository in the Czech Republic, the issuer of the Czech Securities, the paying agent and/or the Czech authorities. We understand that the Czech authorities may forward the information received from us in connection with this procedure to the tax authorities of the country(ies) of residence of the beneficial owner(s).

We hereby undertake to notify Clearstream promptly upon receipt of any information that would render any statement in this One-time Certificate, including any relevant Beneficial Owner document(s), untrue, incomplete or otherwise no longer applicable.

This One-Time Certificate is governed and construed in accordance with the Laws of the Grand Duchy of Luxembourg (for Clearstream Banking S.A. clients) and Germany (for Clearstream Europe AG clients using Creation accounts). The courts of Luxembourg (for Clearstream Banking S.A. clients) and the courts of Germany (for Clearstream Banking AG clients using Creation accounts) shall have exclusive jurisdiction for all legal proceedings relating thereto.

We hereby certify that the above information is true, correct and complete and that I am (we are) authorised representative(s) of the client named below.

For and on behalf of:

Name of Clearstream Banking client:

_____

Address:

_____

Authorised signatories:

_____	_____
Authorised signature	Authorised signature
_____	_____
Name	Name
_____	_____
Title	Title
_____	_____
Place	Date (DD/MM/YYYY)