

**One-Time Certificate – FFI<sup>1</sup> – QIC<sup>2</sup> or NQI<sup>3</sup>**  
**Omnibus Account for exclusively FATCA non-compliant recipients and/or**  
**FATCA compliant recipients being non-U.S. beneficial owners,**  
**U.S. exempt recipients and U.S. specified persons in a U.S. payee pool**

**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 Fund Centre<sup>4</sup> Account number(s): \_\_\_\_\_

With respect to the above Account number(s) (the "Account(s)") with Clearstream Fund Centre), we hereby certify that with respect to all Vestima fund securities that are, or may be, held in the Account(s) from time to time and to all Chapter 4 withholdable payments and/or Chapter 3 reportable amounts paid on such Securities that are U.S. Vestima fund securities, we, the Clearstream Fund Centre Client named below, are acting as an intermediary.

**In regard to our status under Chapter 4 of the U.S. Internal Revenue Code (FATCA)**

We confirm that we are FATCA compliant (*tick one box only and complete as applicable*):

- ☐ As per the FFI agreement signed with the U.S. Internal Revenue Service (referred hereinafter as "IRS"); or
- ☐ As per the Intergovernmental Agreement (IGA) signed between the U.S.A. and \_\_\_\_\_ under Model \_\_\_\_\_ (Type 1 or 2).

We hereby provide our GIIN: \_\_\_\_\_ whenever applicable and our Chapter 4 status code (or status code from Form 1042-S): \_\_\_\_\_

In regard to our Chapter 4 status, we do assume FATCA due diligence and reporting responsibilities to the extent applicable and required by our status, but do not assume primary withholding responsibilities for withholdable payments on Vestima fund securities held on the Account(s). Consequently, we hereby elect to be withheld upon with respect to Chapter 4 withholdable payments paid on the Account(s) whenever applicable in accordance with the notifications we shall provide to Clearstream Fund Centre as stated below.

We hereby undertake to notify Clearstream Fund Centre per withholdable payment with the following, at the latest 10:00 Central European Time two business days prior to the Payment Date of such payment:

- With an allocation breakdown of the portion that must be withheld upon and the portion that is not subject to FATCA withholding; and
- With respect to the portion to be withheld upon:
  - If we are acting as a **Qualified Intermediary**: the type of Chapter 4 withholding rate pool (or Form 1042-S pooled reporting code).
  - If we are acting as a **Non-Qualified Intermediary**: the type of Chapter 4 withholding rate pool (or Form 1042-S pooled reporting codes).

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<sup>1</sup> Foreign Financial Institution.

<sup>2</sup> Qualified intermediary neither assuming primary Non Resident Alien (NRA) withholding responsibility nor assuming the 1099 reporting and backup withholding responsibility.

<sup>3</sup> Non-Qualified Intermediary neither assuming primary Non-Resident Alien (NRA) withholding responsibility nor assuming the 1099 reporting and backup withholding responsibility.

<sup>4</sup> "Clearstream Fund Centre". registered office at 42, avenue John F. Kennedy, L-1855 Luxembourg and registered with the Luxembourg Trade and Companies Register under number B261.691.

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- With respect to the portion not to be withheld upon:
  - If we are acting as a **Qualified Intermediary**: the type of FATCA withholding exemption (or Form 1042-S code) and, where appropriate a “U.S. payees pool”.
  - If we are acting as a **Non-Qualified Intermediary**: documentation for each recipient (an appropriate **W-8 Form**<sup>5</sup> or a **self-certification**), including their Chapter 4 status (or Form 1042-S code) and the type of FATCA withholding exemption (or Form 1042-S code) and otherwise, where appropriate, a “U.S. payee pool”.

We acknowledge that failing to provide such FATCA notification (and relevant documentation when applicable) by such deadline, the payment, or portion of the payment that is not allocated (nor documented when applicable), will be subject to a deduction of FATCA withholding tax at the rate of 30%.

We acknowledge that payments, or portion of payments that are not allocated, that are subject to FATCA withholding will not be subject to additional Chapter 3 withholding.

We further acknowledge that payments exempt from FATCA withholding, as per above certification, must still be duly documented or required information provided under Chapter 3 for purposes of withholding on Chapter 3 Reportable amounts (with the exception of positions include in a “U.S. Payees Pool”).

In regard to U.S. payee pooling whenever applicable, we also confirm that we, or the intermediary on behalf of whom we hold the securities when applicable:

- i) are a Participating FFI (including Reporting Model 2 FFI) or Registered Deemed Compliant FFI (including reporting Model 1 FFI); and
- ii) permitted under Regulations section 1.6049-4(c)(4); and
- iii) for each recipient included in a Chapter 4 withholding rate pool of U.S. payees, to integrate it in such pool.

**In regard to Chapter 3 (QI regime) applicable to all “Chapter 3 Reportable payments”**

We are acting as

☐ **A Qualified Intermediary:**

- Whose Form **W-8IMY** is attached; and
- Not assuming primary Chapters 3 and 4 withholding responsibilities; and
- Holding the Securities exclusively for the account of non-U.S. beneficial owners, and/or U.S. exempt recipients and/or U.S. specified persons in a U.S. Payee Pool.

We hereby undertake to notify Clearstream Fund Centre of the breakdown of Chapter 3 Reportable Amounts due on any Vestima fund securities held in the Account(s) per U.S. withholding tax rate to be applied to such payment, at the latest 10:00 Central European Time two business days prior to the Payment Date of such payment. The “per payment” breakdown will include the following information:

- Account;
- ISIN code;
- Payment date;
- Total holding;
- Breakdown of Chapter 3 reportable portion(s) per U.S. withholding tax rate pool to apply.

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<sup>5</sup> It must be noted that, by reference, any information contained on any underlying withholding certificates associated with the account for which this One-Time Certificate is submitted is an integral part of this One-Time Certificate.

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**FATCA compliant recipients being non-U.S. beneficial owners,**  
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We hereby request Clearstream Fund Centre to apply the above statement and instructions on any Chapter 3 Reportable Amounts when exempted from or not subject to FATCA withholding. We acknowledge that failing to provide such QI notification by such deadline, the payment will be subject to deduction of Chapter 3 withholding tax at the rate of 30%.

☐ **A Non-Qualified Intermediary:**

- Whose Form **W-8IMY** is attached; and
- Is holding the Vestima fund securities:

☐ Directly on behalf of non-U.S. beneficial owners (for which we provide Clearstream Fund Centre with Forms **W-8BEN**, **W-8BEN-E**, **W-8EXP**, or **W-8ECI**, as appropriate, completed in the name of the beneficial owner); and/or U.S. exempt recipients (for which we provide Clearstream Fund Centre. with Form **W-9** completed in the name of each of the U.S. exempt recipients); and/or U.S. specified persons in a U.S Payee Pool

We hereby undertake to notify Clearstream Fund Centre. of the breakdown of Chapter 3 Reportable Amounts due on any Vestima fund securities held in the Account(s), per beneficial owner, at the latest 10:00 Central European Time two business days prior to the Payment Date of such payment. The “per payment” breakdown will include the following information:

- Account;
- ISIN code;
- Payment date;
- Total holding;
- Breakdown of Chapter 3 reportable portion(s) per beneficial owner including the U.S. withholdingtax rate pool to apply.

We hereby request Clearstream Fund Centre to apply the above statement and instructions on any Chapter 3 Reportable Amounts when exempted from or not subject to FATCA withholding.

We acknowledge that failing to provide such notification by such deadline the payment will be subject to deduction of Chapter 3 withholding tax at the rate of 30%.

or

☐ Through unique FATCA compliant foreign Non-Qualified Intermediary.

- Whose Form **W-8IMY** is attached; and
- Holding assets on behalf of several non-U.S. beneficial owners (for which we provide Clearstream Fund Centre. with Forms **W-8BEN**, **W-8BEN-E**, **W-8EXP** or **W-8ECI**, as appropriate, completed in the names of all the beneficial owners); and/or U.S. exempt recipients (for which we provide Clearstream Fund Centre. with Form **W-9** completed in the name of each of the U.S. exempt recipients); and/or U.S. specified persons in a U.S. Payee Pool.

We hereby undertake to notify Clearstream Fund Centre of the breakdown of Chapter 3 Reportable Amounts due on any Vestima fund securities held in the Account(s), per beneficial owner, at the latest 10:00 Central European Time two business days prior to the Payment Date of such payment. The “per payment” breakdown will include the following information:

- Account;
- ISIN code;
- Payment date;
- Total holding;

Breakdown of Chapter 3 reportable portion(s) per beneficial owner including the U.S. withholding tax rate pool to apply.

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We hereby request Clearstream Fund Centre to apply the above statement and instructions on any Chapter 3 Reportable Amounts when exempted of or not subject to FATCA withholding.

We acknowledge that failing to provide such notification by such deadline the payment will be subject to deduction of Chapter 3 withholding tax at the rate of 30%.

or

☐ Through unique or multiple FATCA compliant Qualified Intermediaries.

- Whose **W-8IMY** is attached, and being:

- ☐ Qualified Intermediaries who assumed primary Chapters 3 and 4 withholding responsibility, Forms 1099 and back-up withholding responsibilities; and/or.
- ☐ Qualified Intermediaries who assumed primary Chapters 3 and 4 withholding responsibilities, but did not assume primary Forms 1099 reporting and back-up withholding responsibilities, and receiving all Reportable Amounts exclusively for underlying account holders other than U.S. specified persons for which a 1099 reporting is required; and/or
- ☐ Qualified Intermediaries who have not assumed primary Chapters 3 and 4 withholding responsibility, Forms 1099 reporting, or back-up withholding responsibilities, and receiving all Reportable Amounts exclusively for underlying account holders other than U.S. specified persons for which a 1099 reporting is required.

We hereby undertake to notify Clearstream Fund Centre of the breakdown of Chapter 3 Reportable Amounts due on any Vestima fund securities held in the Account(s), per Qualified Intermediary, at the latest 10:00 Central European Time two business days prior to the Payment Date of such payment. The “per payment” breakdown will include the following information:

- Account;
- ISIN code;
- Payment date;
- Total holding;
- Breakdown of Chapter 3 reportable portion(s) per Qualified Intermediary including U.S. withholding tax rate pool to apply.

We hereby request Clearstream Fund Centre to apply the above statement and instructions on any Chapter 3 Reportable Amounts when exempted from or not subject to FATCA withholding.

We acknowledge that failing to provide such notification by such deadline the payment will be subject to deduction of Chapter 3 withholding tax at the rate of 30%.

We acknowledge that Vestima fund securities subject to 1446 regulations are not eligible at Clearstream Fund Centre. For any remaining positions subject to 1446 regulations, regardless of our status or the status of our recipients, we acknowledge that any amounts/payments/realised amounts/ distributions under Section 1446, should they be received, will be paid net, with maximum taxation applied.

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## **Notifications**

We undertake to notify Clearstream Fund Centre. at the latest by 10:00 Central European Time two business days prior to any relevant Payment Date of any balance of Vestima fund securities that is not covered by this One-Time Certificate or by the attached IRS Form(s) or documentation.

We hereby undertake to notify Clearstream Fund Centre. promptly, and at the latest within 30 days of any changes to the information included in this One-Time Certificate or the attached forms and documentation to which this instruction refers.

We hereby undertake to provide Clearstream Fund Centre within its deadline, with any additional statements, certifications, Forms, documentation or information that may be required under i) the U.S. Internal Revenue Code (IRC) or the regulations thereunder, or ii) under the Luxembourg-U.S.A. Intergovernmental Agreement or implementing legislation or regulations thereunder (for Clearstream Fund Centre S.A. clients).

We hereby acknowledge and agree that in case of erroneous Chapter 4 status classification provided by ourselves, Clearstream Fund Centre will be required, as of 90-calendar days as of the date when the erroneous claim was made, to withhold on future payments, if any, the amount of tax that should have been withheld during this 90-calendar day period.

## **Reporting**

We hereby appoint Clearstream Fund Centre and Clearstream Fund Centre's U.S. Tax Reporting Agent as our attorneys-in-fact with authority to collect and forward any information or documents to the IRS to the extent required under Chapters 3 and 4 of the IRC as amended, and the regulations thereunder.

We similarly appoint them to collect and forward any information or documents to other persons holding the relevant Securities for the account of Clearstream Fund Centre or from whom Clearstream Fund Centre receives payments on such securities.

We irrevocably authorise Clearstream Fund Centre to disclose this certificate or any copy, attachments or related information to the interested party, in the event of or threat of administrative or legal proceedings, an official inquiry or request of the U.S. Internal Revenue Service or other relevant authority, in which or to which this One-Time Certificate (including any certificate, Form, document or other information referred to herein) is, or would be, relevant.

We acknowledge and agree that Clearstream Fund Centre may disclose i) to the Luxembourg tax authorities any information or documents required to be collected and/or reported by Clearstream Fund Centre under the Luxembourg-U.S.A. Intergovernmental Agreement or implementing legislation or regulations thereunder (for Clearstream Fund Centre S.A. clients).

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## Undertakings

We agree irrevocably that, in the event that:

- i) We fail to deliver any certificate, Form or document necessary under the U.S. Internal Revenue Code of 1986 as amended, the regulations issued thereunder, the Qualified Intermediary Agreement published in Revenue Procedure 2022-43 as amended, the Luxembourg-U.S.A. Intergovernmental Agreement (for Clearstream Fund Centre S.A. clients), or implementing legislation or regulations thereunder or Clearstream Fund Centre Governing Documents; or
- ii) This certificate or any certificate, Form or information referred to herein and delivered by us to Clearstream Fund Centre is incorrect, outdated, incomplete or invalid for any reason within our control or within our knowledge;

Then we shall indemnify Clearstream Fund Centre. for any resulting loss, claim, liability or expense. This includes penalties and resulting additions to tax and interest thereon (and reasonable expenses of counsel).

Moreover, Clearstream Fund Centre may charge our account or otherwise reclaim from us and we will pay Clearstream Fund Centre on demand the amount of such charge or loss and any other expenses incurred by Clearstream Fund Centre in pursuing their claim.

We understand that:

- i) If this certificate or any attached or connected certificate, Form or document or any information furnished by us is found to be false, we may be liable for damages and could also be subject to such other sanctions as may be determined by the U.S. Department of the Treasury or Internal Revenue Service, or by the competent Luxembourg authority under the Luxembourg-U.S.A. Intergovernmental Agreement (for Clearstream Fund Centre S.A. clients) or implementing legislation or regulations thereunder; and
- ii) The U.S. Department of the Treasury or the Internal Revenue Service, or the competent Luxembourg authority under the Luxembourg-U.S.A. Intergovernmental Agreement (for Clearstream Fund Centre S.A. clients) or implementing legislation or regulations thereunder, or the competent authority under the Intergovernmental Agreement or implementing legislation or regulations thereunder to which we are subject may determine that any certificate or statement given by us will not be valid to prevent the imposition of the 30% U.S. withholding tax under Chapter 4 of the U.S. Internal Revenue Code on any withholdable payment credited to our account.
- iii) Similarly, The U.S. Department of the Treasury or Internal Revenue Service may determine that any certificate or statement given by us will not be valid to prevent the imposition of the 30% U.S. withholding tax on payments to us of interest that would otherwise qualify for exemption from such tax as "portfolio interest" within the meaning of sections 871 and 881 of the U.S. Internal Revenue Code, and the regulations thereunder. The U.S. Department of the Treasury or IRS may further determine that any certificate or statement given by us will be ineffectual in the preclusion of or entitlement to a reduction of the imposition of the 30% U.S. withholding tax on payments to us of dividends within the meaning of the U.S. Internal Revenue Code.
- iv) In case Clearstream Fund Centre receives the income distributed by the Vestima fund securities net of U.S. withholding taxes (due to the absence of U.S. tax services offered by Clearstream Fund Centre's upstream agents), Clearstream Fund Centre. will not offer any U.S. tax relief at source nor reclaim service on such specific income payment. Any reclaim of U.S. withholding taxes will have to be applied directly to the IRS.

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## **Definitions and abbreviations**

For the purposes of this One-Time Certificate:

- “Beneficial Owner” means, with respect to a Security, any person that under Treasury Regulation §1.1441-1(c)(6) is considered to be the beneficial owner of that Vestima fund security.
- “Chapter 3 Reportable Amount” means any income paid to the account as defined under Treasury Regulation §1.1441-1(e)(3)(vi).
- “Code” means the U.S. Internal Revenue Code of 1986 as amended. Any reference to any section of the Code shall mean such section of any successor provisions.
- “Form” means a U.S. Internal Revenue Service Form **W-8** or **W-9**, or such successor form as shall be adopted from time to time by the U.S. Internal Revenue Service and any substantially similar substitute form as may be permitted by the Code or the regulations thereunder.
- “Withholdable payment” means any payment of fixed or determinable annual or periodical gains, profits and income from sources within the U.S., to the extent treated as a withholdable payment in Chapter 4 of the IRC, and regulations issued thereunder.
- “FFI” refers to Foreign Financial Institution.
- “QIC” refers to Qualified intermediary neither assuming primary Non Resident Alien (NRA) withholding responsibility nor assuming the 1099 reporting and backup withholding responsibility.
- “NQI” refers to Non-Qualified Intermediary neither assuming primary Non-Resident Alien (NRA) withholding responsibility nor assuming the 1099 reporting and backup withholding responsibility.

All terms that are used and not defined herein shall have the meanings given to them in the Internal Revenue Code of 1986 as amended, the regulations issued thereunder, the Qualified Intermediary Agreement published in Revenue Procedure 2022-43 as amended, the Luxembourg-U.S.A. Intergovernmental Agreement (for Clearstream Fund Centre S.A. clients), or implementing legislation or regulations thereunder and Clearstream Fund Centre Governing Documents.

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**Certification**

This statement forms an integral part of the attached withholding certificate. We hereby certify, under penalties of perjury, that the above information is true, correct and complete and that I am/we are an (the) authorised representative(s) of the Client named below.

This One-Time Certificate is governed and construed in accordance with the laws of the Grand Duchy of Luxembourg (for Clearstream Fund Centre S.A. clients) and the courts of Luxembourg (for Clearstream Fund Centre S.A. clients) shall have exclusive jurisdiction for all legal proceedings relating thereto.

It must be noted that, by reference, any information contained on any underlying withholding certificates associated with the account for which this One-Time Certificate is submitted is an integral part of this One-Time Certificate.

**For and on behalf of:**

Name of Clearstream Fund Centre client:

Address:

Client account number:

**Authorised signatorie(s):**

Authorised signature

Authorised signature

Name

Name

Title

Title

Place

Date (MM/DD/YYYY)