

Schedule of Beneficial Owners¹ (Type of Income_____)

(Front)

(Unit: %)

[illegible]

¹ In Korean, the term ‘beneficial owner’ is literally translated as ‘substantive owner.’ For the purpose of English translation of this application, we used the term ‘beneficial owner’ instead of ‘substantive owner’ since it is more widely used term for international standards and the two terms are essentially not different from one and other in its context.

<div data-bbox="1046 143 1121 174">□ Total</div>	<div data-bbox="1206 143 1265 174">100%</div>	
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Filing Instruction

1. This Schedule shall be prepared and submitted by an overseas investment vehicle for each type of income and attached to the Report of Overseas Investment Vehicle, if a Korean source income is paid through such overseas investment vehicle. In this regard, if the beneficial owners include both non-resident individuals and foreign corporations, this Schedule shall be prepared on a combined basis and not for each group separately, and separate attachment may be prepared in same format if the space provided in the Form is insufficient for the number of beneficial owners of the overseas investment vehicle.
2. Item ☐. Mark “V” if the investor is an overseas investment vehicle and mark “BO” if the investor is a beneficial owner. If the investors of the subject overseas investment vehicle include both overseas investment vehicles and beneficial owners, please list beneficial owners first and then overseas investment vehicles.
3. Item ☐. Enter a serial number for each group of overseas investment vehicles and beneficial owners.
4. Item ☐. Enter the full English name of the overseas investment vehicle or the initials of the overseas investment vehicle with its full name in parentheses.
5. Item ☐. Enter the address in English in the following order: street number, street name, city, state, postal code and country. Please do not enter a PO Box.
6. Item ☐. Enter country abbreviations as determined by the ISO or ‘ZZ’ if the residence country of the beneficial owner is not identifiable.
7. Item ☒. Enter the applicable reduced tax rate under the tax treaty between Korea and the country in which the beneficial owner resides. If the reduced tax rate under the tax treaty does not include local income surtax, please enter a tax rate reflecting the tax rate under Article 89(1) of the Local Tax Law. However, if there is no tax treaty between Korea and the country in which the beneficial owner resides or the beneficial owner’s residence country is unidentifiable, please enter a tax rate of Article 156(1) of the PITL or Article 98(1) of the CTL reflecting the tax rate under Article 89(1) of the Local Tax Law. If the investors include other overseas investment vehicle, enter the sum in the column of ☐ Tax Rates or ☐ Total on the Schedule of Beneficial Owners as attached to the Report of Overseas Investment Vehicle received from such overseas investment vehicle. In case of a public overseas collective investment vehicle, enter the sum of tax rates applicable to each type of income as recorded in the column of ☒ Tax Rate To Be Applied on the Report of Overseas Investment Vehicle received from such overseas public collective investment vehicle.
8. Item ☐. Enter the shareholding or investment ratio of each beneficial owner or other overseas investment vehicle investing in the subject overseas investment vehicle. The sum of such investment ratios shall always equal to 100%.
9. Item ☐. Enter the tax rate which is calculated by multiplying ☒ Tax Rate To Be Applied multiplied by ☐ Investment Ratio for each beneficial owner or overseas investment vehicle.
10. 10. Item ☐. Enter the sum of Tax Rates applicable to each respective beneficial owners and overseas investment vehicles. If ☒ Investment ratio, ☒ Tax Rate, or ☒ Sum of Tax Rates is an indefinite decimal, please indicate the ratio or tax rate as a percentage which is rounded up from 5 decimal places and calculated to 4 decimal places (e.g., XX.XXXX%).
11. The withholding obligor or overseas investment vehicle who received this Schedule is required to maintain it for five years starting from the day following the withholding tax payment due date under Article 156(1) of the PITL and Article 98(1) of the CTL and submit it upon request to the Chief of the district tax office having jurisdiction over the tax payment place of the withholding obligor.

