

One-Time Certification for New Zealand Government Debt Securities and other New Zealand Domestic Debt Securities governed by the Approved Issuer Levy Regime

Clearstream Banking S.A.
42, avenue J.F. Kennedy
L-1855 Luxembourg
Luxembourg

Please mail the completed and signed Certificate to:

Clearstream Operations Prague s.r.o.
Attn: PTR - Tax Reclaim Services
Futurama Business Park Building B
Sokolovska 662/136b
CZ-18600 Prague 8
Czech Republic

Clearstream Banking ¹ account(s): _____ (the "Account").

The undersigned customer of Clearstream Banking may hold from time to time in its securities Account with Clearstream Banking New Zealand government debt securities and other New Zealand domestic debt securities governed by the Approved Issuer Levy regime (the "securities").

For the purpose of ensuring that relief at source from New Zealand withholding tax is granted on certain interest payments, and, if applicable, that the quick/standard refund of New Zealand withholding tax is granted on interest payments, we hereby certify that either **(tick box(es))**:

1. We are the beneficial owner of any such securities that we may hold from time to time in the account; **and**
 - a) We are an entity granted tax-exempt status by the New Zealand Inland Revenue Department. We enclose an authenticated copy of the certificate of exemption (COE) obtained from the New Zealand Inland Revenue Department in that respect; **or**
 - b) We are a non-resident in accordance with Section 241, Income Tax Act 1976 (as amended); not granted tax-exempt status by the New Zealand Inland Revenue Department.
2. We are not the beneficial owner of any New Zealand government debt securities and other New Zealand domestic debt securities governed by the Approved Issuer Levy regime but certify that the beneficial owners for whom we hold such securities are not resident for tax purposes in New Zealand in accordance with Section 241, Income Tax Act 1976 (as amended).
3. We hold securities for several beneficial owners eligible for different tax rates and we hereby undertake to provide Clearstream Banking with a per-payment breakdown for each relevant interest payment date. Any such payment breakdown provided for one interest payment date shall be valid only for a given interest payment date and shall not be valid for any subsequent interest payment date related to the Securities that we may hold in our Account. We hereby acknowledge that, for the purposes of obtaining the appropriate reduced rates, we must submit to Clearstream Banking, in addition to this one-time certificate and the per-payment breakdown, also the other required documentation as indicated for the following types of beneficial owner:
 - **Entities granted tax-exempt status by the New Zealand Inland Revenue Department**
 - An authenticated copy of the certificate of exemption (COE) obtained from the New Zealand Inland Revenue Department.
4. If the beneficial owner (including ourselves if applicable) is not an entity granted tax-exempt status by the New Zealand Inland Revenue Department, we herewith apply on the beneficial owner's (including ourselves if applicable) behalf for whose account we are acting, to be covered by the Approved Issuer Levy regime on all interest that may become payable to us on any Securities that we may hold periodically in the above-mentioned account(s).

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¹ "Clearstream Banking" 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 Banking AG (for Clearstream Banking AG customers using Creation accounts) with registered office at 61, Mergenthalerallee, 65760 Eschborn, Germany and registered in Register B of the Amtsgericht Frankfurt am Main, Germany under number HRB 7500"

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5. a) Such application implies that we receive for any **New Zealand government and qualified corporate debt securities covered by the Approved Issuer Levy regime**, held in our Clearstream Banking account(s), the gross amount of interest due on any interest payment date without any deductions.
b) In the case of approved securities other than New Zealand government and qualified corporate debt securities, we authorise the deduction of 2%, or the percentage stipulated by New Zealand law, from all non-resident income that becomes payable to us on such securities, either for our own account or on behalf of non-residents on whose behalf we act and from whom we have received a certificate in a form substantially similar to this one.
6. We acknowledge that this certification is required by New Zealand law. We irrevocably authorize Clearstream Banking to:
 - a) act on the information contained in this certificate unless and until we advise Clearstream Banking before an interest payment date of holdings to be excluded from the present certificate, if any;
 - b) produce this certificate or a copy of this certificate, any attachments and any information relating to it to the New Zealand authorities if these prove relevant to any administrative or legal proceedings or official inquiries undertaken or threatened.
7. We confirm that, for the securities of which we are not the beneficial owner, we have received a certificate from the actual holders substantially similar to this one.
8. This One-Time Certification is governed and construed in accordance with the laws of the Grand Duchy of Luxembourg (for Clearstream Banking S.A. customers) and Germany (for Clearstream Banking AG customers using Creation accounts) and the courts of Luxembourg (for Clearstream Banking S.A. customers) and the courts of Germany (for Clearstream Banking AG customers using Creation accounts) shall have exclusive jurisdiction for all legal proceedings relating thereto.
9. We certify, under penalty of perjury, that the above information is true, correct and complete and that I am/we are authorised representative(s) of the financial institution named below. We will immediately inform Clearstream Banking of any change in the information provided in this certificate and any other related certificate.
10. We accept full responsibility in the case of any claims or additional taxes, interest thereon, or penalties levied by tax authorities in connection with any payments made subject to this certification including any additional information provided in connection to it.

For and on behalf of:

Name of Clearstream Banking customer: _____

Address: _____

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Authorised signatories:

Authorised Signature

Authorised Signature

Name

Name

Title

Title

Place

Date