

Request for Application of a Reduced Rate of New Zealand Withholding Tax on Equities

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

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

We are a customer of Clearstream Banking and hold or may in the future hold New Zealand equities in the Account with Clearstream Banking.

For dividend payments made on New Zealand equities, we acknowledge that the non-resident withholding tax rate (NRWT) of New Zealand is 30% and that Clearstream Banking applies by default a 15% withholding tax rate at source on dividend payments for New Zealand equities.

We hereby acknowledge that, for the purpose of obtaining Clearstream Banking's default rate of 15% for New Zealand equities, we must submit to Clearstream Banking this "Request for Application of a Reduced Rate of New Zealand Withholding Tax on Equities" once and we hereby accept that our positions for which we did not submit this one-time certificate will be taxed at the maximum rate of 30%.

If beneficial owners are subject to a different tax rate, due to a different tax residency or eligibility for tax exemption under New Zealand domestic law, or non-eligibility for a reduced rate of NRWT, we hereby certify that we will submit to Clearstream Banking, in addition to this one-time certificate, no later than the deadlines prescribed by Clearstream Banking, via SWIFT or other agreed authenticated means of communication:

- A breakdown of holdings with the tax rates to be applied on payment date; and, if applicable
- Certification issued by the New Zealand Inland Revenue Department proving the eligibility of beneficial owners for exemption under the relevant New Zealand domestic law.

Furthermore, we hereby certify that we shall, **upon request**, submit the following documentation to Clearstream Banking:

- A "Tax Certificate for New Zealand Equities" including a list of beneficial owners that obtained a reduced rate of NRWT, in the format prescribed by Clearstream Banking in the Clearstream Banking Customer Tax Guide for New Zealand; and
- Proof of tax residence for beneficial owners eligible to obtain a reduced rate of withholding tax at source in accordance with a Double Taxation Treaty (DTT) between their country of residence and New Zealand; and
- Any other tax documentation required from time to time.

We hereby certify that we hold the New Zealand equities for beneficial owners (including ourselves, when applicable) that are not New Zealand residents for tax purposes.

We accept full liability and responsibility for any claims of whatever nature, including, but not limited to, claims for additional taxes, interest thereon or penalties imposed by tax authorities, subsequent to or resulting from the present certification and/or our application for a lower rate of withholding tax to be obtained in accordance with the above procedure.

(continued on next page)

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"

Request for Application of a Reduced Rate of New Zealand Withholding Tax on Equities (cont)

(continued from previous page)

We irrevocably appoint Clearstream Banking and Clearstream Banking's depository as our attorneys-in-fact with the authority to collect and to submit this certificate, a statement of the balance of New Zealand equities recorded on the Account, as well as any documents related thereto and including the names and tax residences of the beneficial owner(s), to the appropriate New Zealand authorities in connection with any tax, judicial or administrative proceeding; we understand that the New Zealand authorities may transmit parts or all of this information to the relevant authorities (including tax authorities) of the beneficial owner's country of residence.

We will notify Clearstream Banking immediately, but in any case before the applicable payment date, if there is a change, with regard to the ownership of the above New Zealand equities, in the eligibility of such holdings in the Account.

We will notify Clearstream Banking immediately of any information rendering this declaration incorrect, untrue or incomplete and will provide Clearstream Banking upon request with any document required in the future for the above purposes.

We irrevocably authorise Clearstream Banking to debit the Account with any amount (including, if applicable, any additional taxes, interest or penalties imposed) that the New Zealand authorities may claim back in relation to this request for application of the lower rate of withholding tax. Before requesting that the above-mentioned account be closed, we undertake to provide Clearstream Banking with an alternative debit authorisation. This Request 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.

For and on behalf of:

Name of Clearstream Banking customer: _____

Address: _____

By (authorised signatories):

Authorised Signature

Authorised Signature

Name

Name

Title

Title

Place

Date