

## Letter of Request to Clearstream Banking for Reclaim of French Withholding Tax V2

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

Clearstream Banking<sup>1</sup> account: \_\_\_\_\_ (the "Account")

Dear Sir/Madam:

Our Account with Clearstream Banking was credited with the dividend payment(s) detailed in the form 5001 submitted with this refund request under deduction of the maximum standard rate of French withholding tax on the securities beneficially owned by the following beneficial owner:

Name of beneficial owner: \_\_\_\_\_

Residence of beneficial owner (full address): \_\_\_\_\_

We hereby request that Clearstream Banking forwards our application to the French Tax Authorities for a refund of EUR \_\_\_\_\_ of withholding tax, to which the beneficial owner is entitled by virtue of:

(Please tick one box only)

- the Double Taxation Treaty between France and \_\_\_\_\_<sup>a</sup>.
- The domestic French law that grants 12.8% tax rate for entities that are foreign individuals. This rate is applicable to income distributions paid as of 1 January 2018.
- The domestic French law that grants 0% (or 15% for SIIC distribution) tax rate for entities that are foreign CIVs.
- Other (please specify)  
\_\_\_\_\_

a. Foreign individuals may, in most cases, obtain a better rate through the domestic law (12.8%) than the DTT rate usually offered. When requesting a DTT rate higher than the domestic rate on behalf of individuals for income payments made as of 1 January 2018, you acknowledge that a better rate could be obtained and that your request is made in full awareness.

We have enclosed all necessary documentation supporting our eligibility to a refund.

Please credit the refunded withholding tax to Clearstream Banking account reference \_\_\_\_\_ upon receipt from the French Tax Authorities.

\_\_\_\_\_  
(continued on next page)

1. Clearstream Banking (or Clearstream) in this document refers collectively to Clearstream Banking S.A. (CBL) and Clearstream Banking AG (CBF). When referring to Clearstream in this document, this shall also apply to LuxCSD S.A. unless otherwise specified.

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With regards to the above, we hereby acknowledge and agree that:

- In case the withholding tax is refunded by the French Tax Authorities directly on the cash account of the beneficial owner, we undertake to inform Clearstream Banking immediately after the receipt of the funds by the beneficial owner. Additionally, we acknowledge that Clearstream Banking reserves the right to stop the service if we fail to comply with this undertaking in a repeating manner;
- The tax reclaim service offered by Clearstream Banking and by the agent (if applicable) for the Security may be subject to changes depending on the French Tax Authorities requirements;
- Neither Clearstream Banking nor the agent (if applicable) guarantee the acceptance of the reclaim or payment of the refund by the relevant Tax Authorities; and
- Clearstream Banking shall not at any time be held liable for any loss or damage caused by the tax reclaim procedure and shall be held harmless in respect of any liability arising from any action taken in relation to the tax reclaim procedure.

We assume full responsibility for the accuracy, completeness and validity of the information contained in this Letter of Request and in any other certificate, document or information submitted with this refund request and will fully indemnify and hold Clearstream Banking harmless for any claim, expenses, costs, penalties or liability in relation to the content of this Letter of Request.

We hereby warrant on a continuing basis that each of the signatories hereto and with respect to all documents submitted from time to time in relation to the Security has full power and authority to sign on behalf of the customer of Clearstream Banking mentioned below.

We understand and agree that signing this Letter of Request does not guarantee a tax refund.

This Letter of Request is governed and construed in accordance with the laws of the Grand Duchy of Luxembourg and the courts of Luxembourg shall have exclusive jurisdiction for all legal proceedings relating thereto.

Yours faithfully,

\_\_\_\_\_  
*Authorised Signature*

\_\_\_\_\_  
*Authorised Signature*

\_\_\_\_\_  
*Name*

\_\_\_\_\_  
*Name*

\_\_\_\_\_  
*Title*

\_\_\_\_\_  
*Title*

\_\_\_\_\_  
*Place*

\_\_\_\_\_  
*Date*

We attach any other documentation as required by the Clearstream Banking procedure.