

One-Time Certificate for South Korea Treasury Bonds (KTB) and Monetary Stabilisation Bonds (MSB)

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 Banking¹ account(s): _____ (the "Account(s)")

We, the undersigned client of Clearstream Banking, may hold from time to time in our Account(s) South Korea Treasury Bonds (KTB) and Monetary Stabilisation Bonds (MSB) (the "Securities").

For the purpose of ensuring that we are eligible for exemption from South Korea withholding tax on interest and redemption payments received from the Securities in the Account(s), we hereby certify that *(tick one box only)*:

1. We are the beneficial owner of any such Securities that we may hold from time to time in the Account(s). We, the beneficial owner, are eligible for exemption from South Korea withholding tax on interest and redemption payments due to our status that is *(tick as appropriate)*:
- a. Public Overseas Investment Vehicle,
 Private Overseas Investment Vehicle,
that is a "foreign corporation" under Article 2 subparagraph 3 of the Corporate Tax Act. We confirm we are either an overseas private investment vehicle that is deemed a beneficial recipient of the income or an overseas public investment vehicle.
 - b. Public Overseas Investment Vehicle,
 Private Overseas Investment Vehicle,
that is not a "foreign corporation" under Article 2 subparagraph 3 of the Corporate Tax Act. We confirm we are either an overseas private investment vehicle that is deemed a beneficial recipient of the income or an overseas public investment vehicle.
 - c. Central or local government or public institution,
 - d. Pension fund,
 - e. Financial institution,
 - f. Other corporate entity.

We hereby acknowledge that, for the purposes of obtaining the appropriate exemption, we must submit to Clearstream Banking, in addition to this one-time certificate, also the other required documentation as indicated:

- Certificate Of Residence (COR).
- Application for tax exemption on interest income from investment in Government Bonds and Monetary Stabilisation Bonds (for non-residents) – Form 19-13(1) (as applicable).
- Application for tax exemption on interest income from investment in Government Bonds and Monetary Stabilisation Bonds (for foreign corporations) – Form 72-6 (as applicable).

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 clients using Creation accounts and Clearstream Banking AG clients) 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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2. We are not the beneficial owner of any such Securities that we may hold from time to time in the Account(s) and we hold the Securities exclusively for the following type of beneficial owner(s) that is (are) eligible for exemption from South Korea withholding tax on interest and redemption payments due to his(their) status that is *(tick as appropriate)*:
- a. Public Overseas Investment Vehicle(s),
 Private Overseas Investment Vehicle(s),
that is (are) a “foreign corporation” under Article 2 subparagraph 3 of the Corporate Tax Act. We confirm that the beneficial owner(s) is(are) either an overseas private investment vehicle that is(are) deemed a beneficial recipient of the income or an overseas public investment vehicle.
- b. Public Overseas Investment Vehicle(s),
 Private Overseas Investment Vehicle(s),
that is (are) not a “foreign corporation” under Article 2 subparagraph 3 of the Corporate Tax Act. We confirm that the beneficial owner(s) is (are) either an overseas private investment vehicle that is (are) deemed a beneficial recipient of the income or an overseas public investment vehicle.
- c. Central or local government(s) or public institution(s),
- d. Pension fund(s),
- e. Financial institution(s),
- f. Other corporate entity(ies).

We hereby acknowledge that, for the purposes of obtaining the appropriate exemption, we must submit to Clearstream Banking, in addition to this one-time certificate, also the other required documentation as indicated for all beneficial owner(s) eligible for exemption from South Korea withholding tax on interest and redemption payments:

- Certificate Of Residence (COR).
- Application for tax exemption on interest income from investment in Government Bonds and Monetary Stabilisation Bonds (for non-residents) – Form 19-13(1) (as applicable).
- Application for tax exemption on interest income from investment in Government Bonds and Monetary Stabilisation Bonds (for foreign corporations) – Form 72-6 (as applicable).

3. We hold the Securities for several beneficial owners who may be subject to different tax rates. We hereby acknowledge that, for the purposes of obtaining the appropriate exemption on a portion or portions of the income to be paid or credited in the Account(s), we must submit to Clearstream Banking, in addition to this One-Time Certificate and no later than the deadlines prescribed by Clearstream Banking a per-payment breakdown for each relevant income payment date. Any such payment breakdown provided for one income payment date shall be valid only for a given income payment date and shall not be valid for any subsequent income payment date related to the Securities that we may hold in the Account(s).

We hereby acknowledge that, for the purposes of obtaining the appropriate exemption, 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 all beneficial owners eligible for exemption from South Korea withholding tax on interest and redemption payments:

- Certificate Of Residence (COR).
- Application for tax exemption on interest income from investment in Government Bonds and Monetary Stabilisation Bonds (for non-residents) – Form 19-13(1) (as applicable).
- Application for tax exemption on interest income from investment in Government Bonds and Monetary Stabilisation Bonds (for foreign corporations) – Form 72-6 (as applicable).

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The per-payment breakdown must be provided by the Clearstream Banking client via Swift (formatted MT565) or Xact Web Portal message, using the following template:

- Clearstream Banking client's account number;
- ISIN code;
- Payment date;
- Corp. event ID;
- Total holding for the event;
- The breakdown of holding per beneficial owner(s) with the respective tax rate to be applied;
- IRC number;
- Full name of the beneficial owner(s) (as per IRC);
- Full address of the beneficial owner(s) (complete street address including postal code, city, country) (as per IRC).

We acknowledge, that it is solely our responsibility, at all relevant times, to monitor the expiration of any certification required for the purpose of obtaining relief or exemption at source and either to obtain renewals of such certification or, immediately on expiration of such certification, to provide instructions to have the correct applicable South Korea withholding tax deducted and that Clearstream Banking has no responsibility or liability in this regard.

We irrevocably authorise Clearstream Banking to act on the information contained in this One-Time Certificate, including authorising Clearstream Banking to:

- I. perform all acts necessary to claim any exemption from or reduced rate of, withholding tax to which the beneficial owners are entitled pursuant to the relevant tax treaty or under the South Korea national law and which may be claimed on our behalf based on the above certifications;
- II. provide, directly or indirectly, to the South Korea tax authorities or any party authorised to audit or conduct a similar control of Clearstream Banking for tax purposes a copy of this One-Time Certificate and other certification provided pursuant to this One-Time certificate and to disclose to such tax authorities any additional information that Clearstream Banking may have in its possession that is relevant to the beneficial owner's qualification for any benefits claimed on the basis of this One-Time Certificate or other information provided;
- III. provide, directly or indirectly, a copy of this One-Time Certificate, other certification provided pursuant to this One-Time certificate and information regarding income paid or credited to or for the benefit of the account(s) set out above to:
 - i. any person that has control, receipt, or custody of income to which this One-Time Certificate relates;
 - ii. any person that can disburse or make payments of income to which this One-Time Certificate relates;
 - or
 - iii. any party authorised to audit or conduct a similar control of aforementioned persons for tax purposes.

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We further agree that we shall provide directly to any such tax authorities, upon their request, such information that we may have in our possession that is relevant to determining whether any beneficial owner that holds through a direct account with us, qualifies for any such benefits claimed.

We further certify that we are subject to Know Your Customer Rules with respect to the direct account holders for which relief at source request will be made pursuant to this One-Time Certificate.

We agree that we will not make a request for a reduction or exemption from withholding tax with respect to a beneficial owner, if we know or should have known that the documentation provided by our direct account holder, is unreliable or incorrect.

We acknowledge and agree that information contained in this One-Time Certificate and other certification provided pursuant to this One-Time certificate, including the information regarding income paid or credited to or for the benefit of the account(s) set out above will be reported to South Korea tax authorities and that the South Korea tax authorities may provide the information to the country in which the beneficial owners are resident for tax purposes.

We further acknowledge, that if Clearstream Banking determine that an amount that should have been withheld from a previous payment made to the Account(s) has not been withheld (or the amount withheld was too low), we authorise Clearstream Banking to take such action as may be appropriate to remedy the shortfall, including increasing the withholding from future payments made to us, arranging covering payment from us or, if necessary, satisfying the obligation out of property that Clearstream Banking holds for us.

We hereby acknowledge and agree that Clearstream Banking, in acting in compliance with the terms of this One-Time Certificate, shall not be liable or responsible for any losses, damages, costs, expenses, claims or liabilities hereunder. We undertake to advise the Clearstream Banking promptly of any change in circumstances which causes the information contained herein or in any other certificate or statement provided pursuant to this One-Time Certificate to become incorrect or incomplete and to provide Clearstream Banking with suitably updated certification within 30 days of such change in circumstances.

We hereby accept full responsibility in the case of any claims made for additional taxes, interest thereon, or penalties levied by tax authorities in connection with any payments made, subject to this One-Time Certificate or any other certificate or statement provided pursuant to this One-Time Certificate entitled to relief at source and therefore to indemnify, exonerate and hold Clearstream Banking harmless from and against any and all actions, causes of action, suits, losses, costs, liabilities, damages and expenses (including reasonable attorneys' fees and disbursements), incurred by Clearstream Banking in respect of any penalties, taxes and interest thereon, levied by the South Korea Tax Authorities or any other authority, or in respect of any other costs incurred in connection with any action taken in reliance upon the contents of this One-Time Certificate and any other certification provided.

We hereby certify that the above information is true, correct, up-to-date and complete and that I am/we are an (the) authorised representative(s) of the Client named below.

This One-Time Certificate shall be effective as of the date mentioned here below and shall remain valid unless terminated by a not less than 10 business days' written notice to Clearstream Banking served to the above-mentioned address.

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This One-Time Certificate is governed and construed in accordance with the laws of the Grand Duchy of Luxembourg (for Clearstream Banking S.A. clients) and Germany (for Clearstream Banking AG clients using Creation accounts) and the courts of Luxembourg (for Clearstream Banking S.A. clients) and the courts of Germany (for Clearstream Banking AG clients using Creation accounts) shall have exclusive jurisdiction for all legal proceedings relating there to.

For and on behalf of:

Name of Clearstream Banking client:

Address:

Client account number:

Authorised signatories:

Authorised signature

Authorised signature

Name

Name

Title

Title

Place

Date (DD/MM/YYYY)