

**Application for tax [ ] interest income from investment in Government Bonds  
exemption on [ ] capital gains and Monetary Stabilization Bonds  
(for foreign corporations)**

[For use in the case where GB and MSB are acquired, held and transferred through a Qualified Foreign Intermediary, etc.]

※ Check the appropriate blank [ ].

<b>Income Recipient (Investor)</b>	①Type	<input type="checkbox"/> Overseas Investment Vehicle ( <input type="checkbox"/> Public, <input type="checkbox"/> Private) <input type="checkbox"/> Central or local government or public institution <input type="checkbox"/> Pension fund <input type="checkbox"/> Financial institution ( <input type="checkbox"/> Investment, <input type="checkbox"/> Insurer, <input type="checkbox"/> Bank, <input type="checkbox"/> Other) <input type="checkbox"/> Other corporate entity		
	②Name of Corporate Entity			
	③Taxpayer ID No.			
	④Address			
	⑤Country of Residence		⑥Resident Country Code	

I hereby submit the application for corporate tax exemption in accordance with Article 93-3 (3) of the Corporate Tax Act and Article 132-4 (2) 1(a) or Article 132-4 (3) 1(a) of the Enforcement Decree of the same Act.

Date:

Applicant      Income Recipient (Investor)      (Signature or Seal)  
(via) Overseas Investment Vehicle      (Signature or Seal)

To: **Qualified Foreign Intermediary, etc.**

<b>Attorney-in-fact</b>	⑦Type of Attorney-in-fact [ ] Tax Agent [ ] Other	⑧Name of Attorney or Corporate Entity	⑨Taxpayer ID No.	
	⑩Address or Location			
	⑪Competent Tax Office		⑫Phone No.	

**Application Procedure**

- The income recipient (investor) shall submit this application to the qualified foreign Intermediary, etc. ("QFI") along with either the certificate of residence issued by the competent authority of the resident country or a document as specified by the Commissioner of National Tax Service. However, the aforementioned documents shall be submitted to the Overseas Investment Vehicle ("OIV") in case where the GB and MSB are acquired, held and transferred via such a vehicle. The OIV shall forward the documents to the QFI.
- Upon receiving this application, the QFI shall, as required by Enforcement Rules of Income Tax Act, fill out Form 19-14(2), which is the statement of transactions and holdings form for QFI, and Form 19-13(3), which is a tax exemption application form, and submit both to the income payer. The income payer will then submit them to the Director of the competent district tax office that has jurisdiction over the place of tax payment, no later than the 9<sup>th</sup> day of the month following the one in which the income payment was made.

I hereby confirm the receipt of the application for tax exemption on interest income and capital gains from investment in GB and MSB.

Date:

**Qualified Foreign Intermediary, etc.**

Official Seal

## Filing Instructions

1. This form is intended for use by “foreign corporations” to apply for tax exemption on interest income or capital gains from investment in GB and MSB under Article 93-3 of the Corporate Tax Act, or to amend an application after tax exemption has been granted, where the Applicant needs to submit an application to an entity whose status as a qualified foreign Intermediary, etc. (“QFI”) has been approved by the Commissioner of National Tax Service. Therefore, the application is null and void where the beneficial recipient of the income is a “Korean corporation.”
2. For “①Type”, “Overseas Investment Vehicle” that is a “foreign corporation” under Article 2 subparagraph 3 of the Corporate Tax Act should be checked when it is an overseas private investment vehicle that is deemed a beneficial recipient of the income or an overseas public investment vehicle. An “overseas public investment vehicle” is an Overseas Investment Vehicle (“OIV”), similar to a “collective investment scheme” defined in Financial Investment Services and Capital Markets Act. It is an OIV which is either legally recognized as a public investment vehicle under the laws of the country in which it was incorporated, or one which has recommended at least 50 investors abroad to subscribe to the acquisition of securities in a preparation of an investment prospectus or similar manner.
3. For “②Name of Corporate Entity”, enter the name of the income recipient in English.
4. “③ and ⑨Taxpayer ID No.”. Enter the number as instructed below:
  - A. If the person has a business registered in Korea: Business Registration Number
  - B. If the person does not have a business registered in Korea and is a(an):
    - 1) Foreign corporation: Corporate Legal Entity Identifier(LEI), Business Registration number on the Certificate of Registration of a Foreign-Invested Enterprise(IRC)
    - 2) Overseas Korean who has a foreign citizenship: Overseas Korean Registration Number on his/her Korean Resident Card
    - 3) Foreign national: Foreign Resident Registration Number(in case of an attorney-in-fact, date of birth) if he/she is registered as a foreign resident in Korea. If sh/she is not, passport number and birth date or Taxpayer Identification Number issued by the country of residence.
    - 4) Korean national or Overseas Korean who maintains a Korean citizenship: Korean Resident Registration Number (in case of an attorney-in-fact, date of birth)
5. “④Address”. Enter the address in the following order: a street number, a street name, a city, a state, a country and a postal code.
6. “⑤Country of Residence” and “⑥Resident Country Code”. Enter the country abbreviation and code according to the International Organization for Standardization(ISO) Country Codes.
7. Fill in ⑦~⑫ when an attorney-in-fact files an application on behalf of the Applicant. When the attorney-in-fact is not a “tax agent” as defined in Article 82 of the Framework Act on National Taxes, the application must be accompanied by a Power of Attorney and its Korean translation confirming a principal-agent relationship.