

One-Time Certificate for Portuguese Debt Securities - DL 193/2005 of November 7

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

We, the undersigned customer of Clearstream Banking¹, may hold, from time to time in our Account, Portuguese debt securities (the "Securities") subject to Art. 17 of Decree-Law 193/2005, of November 7, as amended (the "Special Debt Securities Regime" or "SDSR").

For the purposes of ensuring that relief at source from or, if applicable, a refund under article 9(1) of the SDSR (hereafter referred to as "quick refund") of Portuguese withholding tax is granted on certain interest payments, we hereby certify that (*tick **one** box only and complete as appropriate*):

- We hold the Securities exclusively on behalf of the following single beneficial owner (which may be ourselves) that is (*tick **one** box only*):
- Non-resident in Portugal but eligible for tax exemption according to the Portuguese legislation;
OR
 - Resident in Portugal and eligible for tax exemption according to Portuguese legislation;
OR
 - Resident in Portugal, **not** eligible for tax exemption but requesting the application of a reduced tax rate based on the below disclosure.²

We undertake to notify CBL via SWIFT (formatted MT565 message), CreationOnline or Xact Web Portal message, before the applicable deadline for relief at source, of any holding of Securities for which the above statement does not apply. In the absence of such notification, we irrevocably authorise CBL to consider by default, on each relevant income payment date, our entire holding of Securities as being beneficially owned on behalf of the single eligible beneficial owner (which may be ourselves) and we appoint CBL to request exemption from/a reduced rate of Portuguese withholding tax on our entire position.

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1. Clearstream Banking refers to Clearstream Banking S.A., registered office at 42, avenue John F. Kennedy, L-1855 Luxembourg, and registered with the Luxembourg Register of Commerce and Companies under number B-9248 [CBL].

2. The term "reduced rate", as used in this form, means the rate foreseen in article 71 (1) of the Portuguese Personal Income Tax Code as well as the rate foreseen in article 87(4) of the Portuguese Corporate Income Tax Code.

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(If applicable, to be completed by the Portuguese beneficial owner):

The single beneficial owner (which may be ourselves) is resident in Portugal for tax purposes and eligible for tax exemption/reduced tax rate, as follows:

Full name: _____

Full fiscal address:

Portuguese Tax Identification Number (TIN): _____

Type of investor^a: _____

Code number^b: _____

Other legislation *(complete only if Code number=8)*: _____

We acknowledge that, in order to comply with the requirements of the Portuguese Tax Law, CBL must disclose our/the single beneficial owner's identity and holdings for each interest event. We irrevocably authorise CBL to forward to the Portuguese authorities any information relating to the reporting obligations for each interest payment made on Securities that we may hold in our Account.

- a. Type of investor (individual/legal entity) to be completed by the Portuguese beneficial owner.
- b. Enter one of the following code numbers representing the legal basis for tax exemption for eligible Portuguese beneficial owners:
 - 1 = Art. 97 of CIRC (Corporate Income Tax Code) -Exemption from withholding tax.
 - 2 = Art. 9 of CIRC - State, Autonomous Regions, local authorities, their associations governed by public law and social security federations and institutions.
 - 3 = Art. 10 of CIRC - General Public Interest Companies, Charities and other non-governmental social entities.
 - 4 = Art. 16 of EBF (Tax Incentives Statute) - Pension Funds and assimilated funds.
 - 5 = Art. 21 of EBF - Retirement Savings Funds (FPR), Education Savings Funds (FPE), Retirement and Education Savings Funds (FPR/E).
 - 6 = Art. 22º, Nº 10 of EBF (Tax Incentives Statute) – Tax Regime applicable to Portuguese Collective Investments Vehicles.
 - 7 = Art. 23 - A of EBF - Venture Capital Investment Funds.
 - 8 = Other legislation (indicate the applicable legislation next to Code 8 and, to the extent applicable, reference any other legal instruments relevant to verify the right to an exemption).

OR

We hold the Securities exclusively on behalf of several beneficial owners (including ourselves, when applicable) that are not resident in Portugal and that are eligible for tax exemption according to Portuguese legislation. We undertake to notify CBL via SWIFT (formatted MT565 message), CreationOnline or Xact Web Portal message, before the applicable deadline for relief at source, of any holding of Securities for which the above statement does not apply. In the absence of such notification, we irrevocably authorise CBL to consider by default, on each relevant income payment date, our entire holding as being beneficially owned by non-Portuguese beneficial owners eligible for tax exemption and we appoint CBL to request exemption from Portuguese withholding tax on our behalf.

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OR

We hold the Securities on behalf of several beneficial owners (including ourselves, when applicable) that are, according to Portuguese legislation:

- Non-residents of Portugal eligible for tax exemption; and
- Non-residents of Portugal not eligible for tax exemption and/or undisclosed beneficial owners.

We undertake to provide to CBL, before each relevant interest payment date or, if applicable, quick refund application and by the prescribed deadlines, via SWIFT (formatted MT565 message), CreationOnline or Xact Web Portal message, a breakdown of holdings indicating:

- Our total holding; and
- The total position held on behalf of beneficial owners that are non-residents of Portugal eligible for tax exemption; and
- The total holding held on behalf of non-residents of Portugal not eligible for tax exemption and/or undisclosed.

Any such breakdown of holdings provided for one interest payment date is valid only for that given interest payment date and shall not be valid for any subsequent interest payment date related to Securities that we may hold in our Account.

We acknowledge that all declared positions must be accurate on the relevant record date at 19:00 CET. We agree that any discrepancy between the declared positions and our total holding visible in CBL's books will have as result the application of the maximum standard tax rate. Furthermore, if no breakdown of holdings is received by CBL by the prescribed deadline, we acknowledge and agree that our total holding will be considered as uncertified and, as a consequence, the maximum standard tax rate will be applied at source.

OR

We hold the Securities on behalf of several beneficial owners (including ourselves, when applicable) that, according to Portuguese legislation, are:

- Non-residents of Portugal eligible for tax exemption; and
- Residents of Portugal eligible for tax exemption/reduced tax rate; and
- Non-residents of Portugal not eligible for tax exemption and/or undisclosed beneficial owners.

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We undertake to provide to CBL, before each relevant interest payment date or, if applicable, quick refund application and by the prescribed deadlines:

- Beneficial Owners Disclosure via SWIFT (formatted MT565 message), CreationOnline or Xact Web Portal message, duly completed in the relevant format, provided and valid for one dividend payment date and only related to Securities that we may hold in our Account; and
- A breakdown of holdings, via SWIFT (formatted MT565), CreationOnline or Xact Web Portal message (Please refer to the CBL Customer Handbook for full formatting requirements), indicating:
 - Our total holding;
 - The total position held on behalf of beneficial owners that are non-residents of Portugal eligible for tax exemption;
 - The total holding held on behalf of non-residents of Portugal not eligible for tax exemption and/or undisclosed; and
 - The total holding held on behalf of residents of Portugal eligible for tax exemption.
 - The total holding held on behalf of residents of Portugal eligible for a reduced tax rate.

We acknowledge that all declared positions must be accurate on the relevant record date at 19:00 CET. We agree that any discrepancy between the declared positions and our total holding visible in CBL's books will have as result the application of the maximum standard tax rate. Furthermore, if no List of Beneficial Owners is received by CBL by the prescribed deadline, we acknowledge and agree that our total holding will be considered as uncertified and, as a consequence, the maximum standard tax rate will be applied at source.

We acknowledge that, in order to comply with the requirements of Portuguese legislation, CBL must disclose the identity and holdings of all Portuguese beneficial owners disclosed in the List of Beneficial Owners. We irrevocably authorise CBL to forward to the Portuguese authorities any information relating to the reporting obligations for each interest payment made on Securities that we may hold in our Account.

We irrevocably authorise CBL to act on the information contained in this certificate. We hereby appoint CBL and CBL's depository for the Securities as our attorneys-in-fact with authority to collect and forward this certificate or a copy of this certificate, any attachments and any information relating to it to the Portuguese authorities if these prove relevant to any administrative or legal proceedings or official inquiries undertaken or threatened.

We hereby undertake to notify CBL promptly upon receipt of any information that would render any statement in this certificate untrue or incomplete.

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 in reliance upon this certification, including any additional information provided in connection with it, regardless of the tax liability scheme prescribed in Portuguese law.

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We hereby certify that the above information is true, correct and complete and that I am (we are) authorised representative(s) of the customer named below with powers to produce and undersign this declaration.

For and on behalf of:

Full name of customer: _____

Full address for tax purposes: _____

Tax ID Number (if available): _____

By (authorised signature/s):

Authorised Signature

Authorised Signature

Name

Name

Title

Title

Place

Date