

Declaration of a foreign legal person that is the ultimate beneficial owner of the income ("Declaration")

We,

Name of company: _____

Company ID: _____

TIN (Tax identification number): _____

Address: _____

hereby confirm that we are a tax resident of _____

for the purposes of all income credited, transferred or paid to us upon a request/instruction of the local custodian: **Československá obchodná banka, a.s.**, Company Registration Number 36 854 140, registered at the Commercial Register maintained by the Municipal Court Bratislava III, Section Sa, File Number: 4314/B (the "Custodian") and based on respective income payment details provided to issuer/withholding agent by the Custodian.

The term "income" above means any dividends, interest, coupons or any other income collected for the Beneficial Owner by the **Custodian**.

We declare that :

- **We are the ultimate beneficial owner of the income**, in the meaning of Slovak Income Tax Law (Section 2, letter af) of the Slovak Income Tax Law) – the given income is considered to be our income, we receive it for our own benefit and not as an agent, intermediary or proxy on behalf of someone else, and the respective income is not attributable to any our branch or permanent establishment in the Slovak Republic (if any) within the meaning of the applicable tax laws, and
- **We are not a tax transparent entity** under the tax law in our home country (not applicable on physical person).

We ask issuer/withholding agent to apply the benefits from Slovak Income Tax Act and/or the Double Taxation Treaty, if any, concluded between the above-mentioned country of our tax residency and the Slovak Republic in respect of the above-mentioned income.

For the purposes of the application of benefits from the above mentioned Double Taxation Treaty, we further declare that

- the application of the benefits under the mentioned Double Taxation Treaty does not create opportunity for non-taxation or reduced taxation through tax evasion or tax avoidance,**
- the application of such benefits is not the main or one of the main objectives of realization of the respective income,**
- we are entitled to those benefits and that their application is in** accordance with the purpose and objective of the relevant provisions of the mentioned Double Taxation Treaty, and
- our residency status for the period of validity of this Declaration has been or will be confirmed by the tax authorities of _____ for each calendar year concerned, and such confirmation ("tax domicile certificate") is attached to this Declaration or an updated version will be provided via the **Custodian** for each calendar year concerned in due course when required.

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This Declaration is valid then until revoked or replaced by a new/updated Declaration. If any changes occur in the above-mentioned facts with relation to any income payment, we undertake to inform issuer/withholding agent via the Custodian of this fact in writing without undue delay and provide it with an updated Declaration, if relevant.

We acknowledge that issuer/withholding agent will rely on this Declaration when providing income payments to us upon a request of the **Custodian**. We request issuer/withholding agent to use the information stated in this Declaration in connection with all income credited, transferred or paid through the Custodian to us. We undertake – pursuant to Section 725 of Slovak Act no. 513/1991 Coll., the Commercial Code, as amended – to indemnify the Custodian/issuer/withholding agent for any damage that the **Custodian**/issuer/withholding agent may incur, as a result of using such information for above mentioned purposes, in particular the damage incurred by the **Custodian**/issuer/withholding agent as a result of the information contained in this Declaration being inaccurate, untrue or misleading.

The undersigned person(s) hereby declare that they are authorized and entitled to sign this Declaration on behalf of the ultimate beneficial owner stipulated above.

Authorised signatories

Authorised signature (with company stamp)

Authorised signature (with company stamp)

Name

Name

Title

Title

Place

Date (DD/MM/YYYY)