

One-Time Certificate Publicly Listed Finnish Equities – Own assets

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

LuxCSD¹ account(s): _____ (the "Account(s)")

We, the undersigned client of Clearstream Banking may hold from time to time, in the Account, publicly listed equities issued by entities organised under Finnish law that are held at the Finnish Central Securities Depository Euroclear Finland (EFI) (the "Securities").

We hereby certify that we:

- are the final economic beneficial owner of all the Finnish dividend payments related to the Securities and paid to our Account and that our entitlement to such dividend payments is not restricted by any contractual obligations (such as lending and borrowing arrangements) which would require that the dividend paid to us is transferred further to an actual investor; and
- are entitled to the application of withholding tax at the reduced tax rate due to our status as a beneficial owner that is *(tick as appropriate)*:

1. Double Taxation Treaty (DTT)

- A. A resident for tax purposes in _____ and that is entitled to application of the **standard** withholding tax rate provided under the relevant **DTT** with Finland and the country of residence of the beneficial owners (the "Treaty").

By confirming the applicability of the standard rate, we further confirm that any relevant tests provided for within the Treaty; and this includes but is not limited to: type of investor; size of holding; beneficial ownership; any limitation of benefits provision etc.; are met.

Please note, that in applying the standard rate, no additional assessment has been made by Clearstream Banking on whether a different rate of withholding tax could apply.

OR

- B. A resident for tax purposes in _____ and that is entitled to application of withholding tax at reduced rate of _____ %, according to the **special articles of the DTT** concluded between Finland and the country of residence of the beneficial owners.

By confirming this, we further confirm that any relevant tests provided for within the Treaty; and this includes but is not limited to type of investor; size of holding; beneficial ownership; any limitation of benefits provision etc.; are met;

OR

- C. A resident for tax purposes in _____ and that is entitled to application of withholding tax at reduced rate of _____ %, due to **direct investment dividend** according to the articles of the **DTT** concluded between Finland and the country of residence of the beneficial owners.

By confirming this, we further confirm that any relevant tests provided for within the Treaty; and this includes but is not limited to type of investor; size of holding; beneficial ownership; any limitation of benefits provision etc.; are met.

¹ LuxCSD refers to LuxCSD S.A., registered office at 42, Avenue J.F. Kennedy, L-1855 Luxembourg, registered with the Luxembourg Trade and Companies Register under number B-154.449.

One-Time Certificate Publicly Listed Finnish Equities – Own assets

We further undertake to provide, per payment and within the Clearstream Banking deadline:

A **direct investment confirmation**, which must fulfil the below requirements:

- Be issued by the issuing company;
- Confirm that on record date that the beneficial owner meets the conditions for exemption under the “direct investment” articles (such as holding 10% of the capital of the company distributing the dividends).

Attached is:

- A form **ISD-E**, duly completed in our name, confirming our status and country of tax residence; and
- A **certificate of residence** confirming our eligibility for a reduced rate or tax exemption under the relevant treaty articles (*only required, if requesting a reduced rate/exemption according to the “special” or “direct investment” articles of the DTT*).

We further acknowledge that, in the event, where the DTT rate requested is less than 15% and the gross dividend amount received from one single dividend payer per payment is EUR 10.000,00 or more, then we must submit to LuxCSD, for the purpose of obtaining the appropriate reduced rate on the income to be paid or credited on the Securities in the Account, in addition to the above and no later than the deadlines prescribed by LuxCSD, the following certification:

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

“Att. Tax Operations

LuxCSD account: XXXXX (the “Account”)

ISIN: FIXXXXXXXXXXX

Payment date: XX.XX.XXXX

Per-payment declaration for dividend payments received from Finnish publicly listed equities with DTT rates below 15%

For the purpose of ensuring that relief at source (or quick refund) from Finnish withholding tax is granted on the above dividend payment, paid to our Account, with a withholding tax rate below 15%, we hereby certify that we:

Name of beneficial owner (full name): XXXX

Tax residence of beneficial owner (full address): XXXX

Tax identification number of the beneficial owner (local TIN): XXXX

- *are the final economic beneficial owner of the Finnish dividend payment related to the ISIN FIXXXXXXXXXXX and paid to our Account on VD XX/XX/XXXX, and that our entitlement to such dividend payment is not restricted by any contractual obligations (such as lending and borrowing arrangements) which would require that the dividend paid to us is transferred further to an actual investor; and*
- *are entitled to the application of withholding tax at the reduced tax rate of XX% in accordance with the DTT concluded between Finland and our country of tax residence.*

This per-payment declaration complements the “One-Time Certificate for Finnish publicly listed equities - own assets” dated XX.XX.XXXX.”

OR

One-Time Certificate Publicly Listed Finnish Equities – Own assets

2. Domestic law

A. A **non-Treaty corporation** who is eligible for a 20% tax rate.

OR

B. A tax-exempt entity eligible for tax exemption (0%) as **comparable to a corresponding tax-exempt Finnish entity**.

OR

C. A tax-exempt entity eligible for tax exemption (0%) in accordance with the **Parent-Subsidiary Directive**.

We further undertake to provide, per payment and within the LuxCSD deadline:

A Parent-Subsidiary Directive confirmation, which must fulfil the below requirements:

- Confirm that on record date that the beneficial owner held a substantial holding in the company (owns at least 10% of the capital of the company distributing the dividends);
- Confirm that the beneficial owner/ company takes one of the forms listed in the Annex I, Part A of the Directive; and
- Confirm the beneficiary's country of residence is in the European Economic Area.

OR

D. A tax-exempt entity eligible for tax exemption (0%) according to **other domestic law**.

Attached is:

- A form **ISD-E**, duly completed in our name, confirming our status and country of tax residence; and
- A **tax-at-source card** (only applicable for beneficial owners eligible for tax exemption 0%) issued by the Finnish Tax Administration, confirming our status and eligibility for tax exemption for Finnish dividend payments.

General:

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/quick refund and either to obtain renewals of such certification or, immediately on expiration of such certification, to provide instructions to have the correct applicable Finnish withholding tax deducted and that LuxCSD has no responsibility or liability in this regard.

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

- I. Perform all acts necessary to claim any exemption from or reduced rate of, withholding tax to which we are entitled pursuant to the relevant tax treaty or under the Finnish national law of and which may be claimed on our behalf based on the above certifications;
- II. Provide, directly or indirectly, to the Finnish tax authorities or any party authorised to audit or conduct a similar control of LuxCSD for tax purposes a copy of this One-Time Certificate and to disclose to such tax authorities any additional information that LuxCSD may have in its possession that is relevant to determining our 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;

One-Time Certificate Publicly Listed Finnish Equities – Own assets

- 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.

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 Finnish tax authorities and that the Finnish tax authorities may provide the information to the country in which we are a resident for tax purposes.

We further acknowledge, that if LuxCSD determines 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 authorize LuxCSD 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 LuxCSD holds for us.

We hereby acknowledge and agree that LuxCSD, 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 LuxCSD 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 LuxCSD with suitably updated certification within 30 days of such change in circumstances.

Should we not receive the expected proceeds as per the tax certification and/or instruction provided to LuxCSD, we hereby further (i) undertake to request LuxCSD – within a period of three (3) working days from the payment date of the relevant income or corporate action event, to perform the readjustment towards, if applicable, the relevant local custodian, paying agent or tax authority and (ii) confirm that LuxCSD shall not incur any liability in case we did not request such rectification within the time frame set forth hereinabove in “(i)”.

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 and any other certification provided pursuant to this One-Time certificate, entitled to relief at source or a quick refund and therefore to indemnify, exonerate and hold LuxCSD 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 LuxCSD in respect of any penalties, taxes and interest thereon, levied by the Finnish 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 pursuant to this One-Time Certificate.

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 ten (10) business days' written notice to LuxCSD served to the above-mentioned address.

**One-Time Certificate Publicly Listed Finnish Equities –
Own assets**

This One-Time Certificate is governed by and shall be construed in accordance with the laws of (i) the Grand Duchy of Luxembourg and the courts of the Grand Duchy of Luxembourg shall have exclusive jurisdiction for all legal proceedings relating thereto.

For and on behalf of:

Name of LuxCSD client:

Address:

Client account number:

Authorised signatories:

Authorised signature

Authorised signature

Name

Name

Title

Title

Place

Date (DD/MM/YYYY)