



EURONEXT SECURITIES

FISCAL GUIDE

BELGIUM

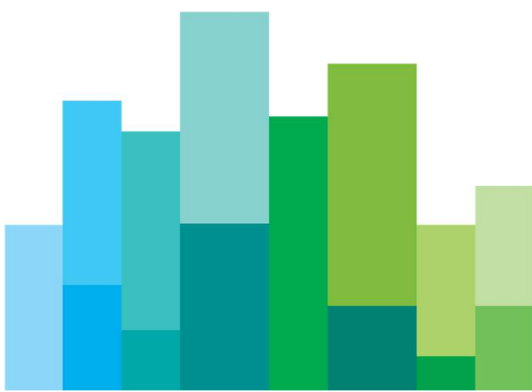
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TABLE OF CONTENTS

- 1 BELGIUM MARKET..... 3**
- 1.1 Securities 4**
- 1.2 Relief at source procedure (for Government and corporate bonds held with NBB) 6**
 - 1.2.1 Eligibility criteria 6
 - 1.2.2 Documentation requirements..... 6
- 1.3 Standard Refund procedure (for equity)..... 6**
 - 1.3.1 Eligibility criteria 6
 - 1.3.2 Documentation requirements..... 6
 - 1.3.3 Deadline for receipt of documentation..... 7
- 1.4 Long refund procedure for exempt entity 7**
 - 1.4.1 Eligibility criteria 7
 - 1.4.2 Long Tax Reclaim procedure 7

BELGIUM MARKET



1.1 Securities

Below you find the types of securities involved and the procedure/s in place.

| Securities | Relief at source | Quick refund | Standard refund |
|-----------------|------------------|---------------|-----------------|
| Bonds | Available | Not available | Not available |
| Equities | Not available | Not available | Available |

Important notice:

ES-MIL can accept in its account held in NBB (National Bank of Belgium) only securities held on behalf of beneficial owners that are not resident for tax purposes in Belgium.

Such restriction is applicable to Belgium Government bonds and corporate bonds held at NBB.

No restriction for equities held with ESES as custodian.

Government and corporate bonds held with NBB

| Securities | Procedure | Eligible subjects | Required documents | Deadline | Appendix website |
|--|------------------|--|--|---|------------------|
| Government and corporate bonds held with NBB | Relief at source | Non Belgium resident Resident in US | Identification form (clients cannot hold bonds on behalf of Belgium residents) | Immediately after securities have been booked in the account held at MT | N.A. |

Equities

| Securities | Procedure | Eligible subjects | Required documents | Deadline | Appendix website | |
|--|------------------|---|---|--|--|---------------------------|
| Equities Corporate actions subject to section 302 of the IRS revenue code | Long Reclaim | Exempt beneficiaries (Appendix B) | BE - MT552 | 4 months before the end of the fourth calendar year following the payment date | Appendix 1 | |
| | | | Power of attorney (the full chain of POAs is required for each link in the custody chain) | | N.A. | |
| | | non resident entities which do not exercise a lucrative business and are exempted from all income Tax in their country of residence (article 106 §2 of the Royal Decree CIR / 92) | BE – credit advice | | Appendix 2 | |
| | | Certain resident organizations for financing pensions (OFP) can benefit from the exemption (article 115 §1 of the Royal Decree CIR/92) | Certificate of exemption provided by the tax authorities in the final beneficiary's country of residence | | N.A. | |
| | | International Organizations | Identification of final beneficiary, including their complete address and Tax ID number | | N.A. | |
| | | Tax Treaties signed by Belgium provide an exemption to contracting States, their subdivisions and Central Banks | Annex 29 | | Appendix 6 | |
| | Standard reclaim | Resident in a country that has concluded a DTT with Belgium (Appendix A) | MT's participant that are eligible at record date and have been elected via instructions for the related corporate action | BE - MT552 | 4 months before the end of the fourth calendar year following the payment date | Appendix 1 |
| | | | | BE – Form 276-Div | | Appendix 3A Appendix 7 |
| | | | | Power of attorneys (the full chain of POAs is required for each link in the custody chain) | | N.A. |
| | | | | BE – credit advice | | Appendix 2 |
| | | | BE – Form 6166 (only for US persons) | | N.A. | |

1.2 Relief at source procedure (for Government and corporate bonds held with NBB)

1.2.1 Eligibility criteria

ES-MIL can hold securities with National Bank of Belgium (NBB) only on behalf of exempt investors (non Belgium residents) and it is required to certify to NBB either for itself and for its participants.

1.2.2 Documentation requirements

Immediately after such securities are booked in the participant account, MT will ask to send the Identification Form available on our website.

Such form will be forwarded to NBB to prove MT participant not to hold securities on behalf of Belgium resident investors; it is important to underline that the form is in use to certify at account and not participant level, therefore each time securities are booked into a new account the participant will be asked to provide it.

1.3 Standard Refund procedure (for equity)

1.3.1 Eligibility criteria

Application of the Double Taxation Agreement (DTA) withholding tax rate if the beneficial owner holding the Belgian equities is resident in a country that has a DTA in place with Belgium. For a list of DTA countries, consult the DTA - Equities table.

1.3.2 Documentation requirements

To apply for a Standard Refund, client must send us the following documents:

- cover letter (MT552)
- tax reclaim form 276DIV completed per ISIN and per beneficial owner
- supporting documentation such as POA, credit advice if required

- 6166 certificate for US investors

1.3.3 Deadline for receipt of documentation

To be effective, our Tax Team must receive the documentation four months before the Belgian tax authorities' deadline, at the latest.

1.4 Long refund procedure for exempt entity

1.4.1 Eligibility criteria

Due to a change in the Belgium law beneficial owners that are corporations or exempt charities domiciled in the European Economic Area (EEA) - except Liechtenstein - can claim exemption from withholding tax on Belgium dividends.

Companies entitled are:

- not resident in Belgium;
- not engaged in profit-making activities;
- exempt from income tax in its country of residence;
- an entity that has as unique and sole purpose, the management and investment of funds collected for the constitution of legal and complementary personal pension schemes;
- not obliged to immediately pass on the dividend to an ultimate beneficial owner that is not itself entitled to the exemption;
- a tax-exempt Belgian public entity or an international or supranational organization recognized as tax-exempt by the Belgian authorities . For an overview consult the List of tax-exempt international or supranational organizations.

1.4.2 Long Tax Reclaim procedure

This procedure applies to full tax refunds if the eligible beneficial owner missed the tax exemption procedure at source.

In order to benefit from this procedure the eligible beneficial owner should provide:

- annex 29;
- set of the POA's (between the beneficial owner and custodian; and between the custodian and the sub-custodian);

- credit advice related to the income payment;
- certificate of exemption delivered by the beneficial owner's local tax authorities;
- additional information / documents may be requested.



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