

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

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

Clearstream¹ account(s): _____ [the "Account"]

We, the undersigned client of Clearstream, 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 Clearstream via Swift (formatted MT565 message), 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 Clearstream 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 Clearstream to request exemption from/a reduced rate of Portuguese withholding tax on our entire position.

¹ Clearstream refers to (i) Clearstream Banking S.A. registered office at 42, avenue John F. Kennedy, L-1855 Luxembourg and registered with the Luxembourg Trade and Companies Register under number B-9248 and (ii) Clearstream Europe AG (for Clearstream Europe AG clients using Creation accounts) with registered office at Mergenthalerallee 61, 65760 Eschborn, Germany, and registered in Register B of the Amtsgericht Frankfurt am Main, Germany under number HRB 7500.

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):

We further certify that, in the event the Securities are held by us in our capacity as beneficial owner:

- we qualify as the beneficial owner for tax purposes and are entitled to any related tax relief claimed, based on the applicable tax laws and regulations in the Portuguese market;
- such related tax relief entitlement to any related tax relief is valid for any such Securities sourced in the Portuguese market already held on the Account or to be held in the future in the Account;
- such related tax relief entitlement to any related tax relief is not restricted by any contractual obligation such as a lending or collateral arrangement

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, Clearstream must disclose our/the single beneficial owner's identity and holdings for each interest event. We irrevocably authorise Clearstream 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, excluding ourselves, that are not resident in Portugal and that are eligible for tax exemption according to Portuguese legislation. We undertake to notify Clearstream via Swift (formatted MT565 message), 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 Clearstream 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 Clearstream 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, excluding ourselves, 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 Clearstream, before each relevant interest payment date or, if applicable, quick refund application and by the prescribed deadlines, via Swift (formatted MT565 message), 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 Clearstream's books will have as result the application of the maximum standard tax rate. Furthermore, if no breakdown of holdings is received by Clearstream 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, excluding ourselves, 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.

We undertake to provide to Clearstream, 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), 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), or Xact Web Portal message (Please refer to the Clearstream Client Handbook the Xact via Swift User Guide 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.

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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 Clearstream's books will have as result the application of the maximum standard tax rate. Furthermore, if no List of Beneficial Owners is received by Clearstream 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, Clearstream must disclose the identity and holdings of all Portuguese beneficial owners disclosed in the List of Beneficial Owners. We irrevocably authorise Clearstream 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 Clearstream to act on the information contained in this certificate. We hereby appoint Clearstream and Clearstream'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 Clearstream 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.

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

This One-Time Certificate shall be effective as of the date mentioned here below and shall remain valid for 5 years as from that date unless terminated by not less than ten (10) business days' written notice to Clearstream served to the above-mentioned address. Upon expiration of the validity, we undertake to provide Clearstream with a renewed One-Time Certificate.

This onetime certificate is governed and construed in accordance with the laws of the Grand Duchy of Luxembourg (for Clearstream Banking S.A. clients) and Germany (for Clearstream Europe AG clients using Creation accounts) and the courts of Luxembourg (for Clearstream Banking S.A. clients) and the courts of Germany (for Clearstream Europe AG clients using Creation accounts) shall have exclusive jurisdiction for all legal proceedings relating thereto.

For and on behalf of:

Full name of client: _____

Full address for tax purposes: _____

Tax ID Number (if available): _____

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By (authorised signature/s):

Authorised signature

Name

Title

Place

Authorised signature

Name

Title

Date (DD/MM/YYYY)