

## Israeli Securities - One-Time Certificate

**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

Clearstream<sup>1</sup> account(s): \_\_\_\_\_ (the "Account")

We, the undersigned client of Clearstream may hold from time to time in our Account Israeli Government bonds, Treasury Bills, Corporate bond or Equities (the "Securities").

For the purposes of ensuring that we are eligible to hold and obtain relief at source on income payments on the Securities in the Account, we hereby certify that:

1. Beneficial owner(s) of the Securities, including ourselves when applicable, are (as defined by the relevant Israeli laws and regulations) not resident for tax purposes in Israel and do not operate/derive income from the Securities through an Israeli permanent establishment; and that
2. (please complete only PART A - Segregated account per beneficial owner; or only PART B - Omnibus Account):

**A. Segregated account per beneficial owner** (If you complete this Part A, please leave Part B blank).

We hold the Securities in the Account exclusively for the following sole beneficial owner:

Name of beneficial owner: \_\_\_\_\_

Country of residence for tax purpose: \_\_\_\_\_

ID Number (for example, passport number or company registration number): \_\_\_\_\_

Tax file number (provided by the local tax authorities of the 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 Israeli market;
- such related tax relief entitlement to any related tax relief is valid for any such Securities sourced in the Israeli 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

We further certify that the sole beneficial owner (tick one box only):

A.1  is eligible for relief according to the Double Taxation Treaty (DTT) between \_\_\_\_\_ (the country of residence of the beneficial owner) and Israel and hereby acknowledge that the reduced DTT rate will be applied for taxable Israeli income payments made on our Account;

OR

A.2  is recognised as tax-exempt by the Israeli Tax Authorities and hereby acknowledge that full exemption will be applied for taxable Israeli income payments made on our Account and we acknowledge that a valid Certificate of Exemption, issued by the Israeli Tax Authorities, must be provided to Clearstream once before the first payment date;

<sup>1</sup> 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.

## Israeli Securities - One-Time Certificate

OR

A.3  is not eligible for relief according to the DTT and we hereby acknowledge that the maximum withholding tax rate will be applied for taxable Israeli income payments made on our Account.

**B. Omnibus account** (*If you complete this Part B, please leave Part A blank*).

We hold the Securities on behalf of several beneficial owner(s).

We hereby acknowledge that, for the purposes of obtaining the appropriate reduced rates, we must submit to Clearstream, in addition to this Israeli Securities - One-Time Certificate and no later than the deadlines prescribed by Clearstream, via Swift or other agreed authenticated means of communication, a per-payment Breakdown of Holdings confirming the quantity of the securities held, split by tax residence of the beneficial owners for which withholding tax relief is sought, with the mention of the tax rates to be applied.

We acknowledge that, for beneficial owners recognised as tax-exempt by the Israeli Tax Authorities:

- A valid Certificate of Exemption, issued by the Israeli Tax Authorities, must be provided to Clearstream once before the first payment date; and
- The per-payment Breakdown of Holdings must additionally include the full name of the tax-exempt beneficial owner(s).

We further acknowledge and accept that, if this per-payment Breakdown of Holdings, as well as any other documentation specifically required by the Israeli Tax Authorities and specified to us by Clearstream, is not received by Clearstream within the prescribed deadlines, the maximum withholding tax rate will be applied for taxable Israeli income payments made on our Account.

### Generally:

We confirm that, for the part of the Securities of which we are not the beneficial owner, we have received a certificate on the same terms as this certificate from the holder(s)/beneficial owner(s) on whose behalf we are acting.

Where a relief at source is requested on behalf of a beneficial owner, where the country of residency is a country with which Israel has a Double Taxation Treaty (DTT), we certify that we have received certification from the beneficial owner or our client that the beneficial owner is a resident for tax treaty purposes and the investment is not attributable to an Israeli permanent establishment.

With respect to each dividend or interest payment or any other payment received in connection with the Securities held in the Account (the "Payment") and for which withholding tax relief, based on DTT agreements, is sought, we shall, upon request of Clearstream, whether based directly or not on requirements of the Israeli Tax Authorities, provide the following documentation to Clearstream, which may be requested up to four years after the relevant payment:

- A List of Beneficial Owners who are the recipients of such Payment, including the following details:
  - Name(s) of beneficial owner(s);
  - Country of residence for tax purpose of the beneficial owner;
  - Identification number (for example, passport number or company registration number);
  - An Identification number (provided by the tax authorities of the country of the beneficial owners tax residence or number of tax file) given by the domicile tax authorities;
  - Date of payment;
  - Interest or dividends;
  - ISIN of the securities for which the payment was received;
  - Quantity of securities;
  - Gross Payment in local or foreign currency;
- Tax deducted, in local or foreign currency;
- A Proof of tax residence for beneficial owners who are eligible to obtain a reduced rate of withholding tax at source;
- Any other tax documentation required from time to time.

## Israeli Securities - One-Time Certificate

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 One-Time 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.

We hereby certify, under penalty of perjury, that the above information is true, correct and complete and that I am (we are) authorised representative(s) of the Clearstream client named below. We will immediately inform Clearstream of any change in the information provided in this certificate and any certificate related to this certificate.

We understand and agree that signing this declaration does not guarantee relief at source.

### For and on behalf of:

Name of Clearstream client: \_\_\_\_\_

Address: \_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

### By (authorised signature/s):

Authorised signature

Name

Title

Place

Authorised signature

Name

Title

Date (DD/MM/YYYY)