

## Request for Application of a Reduced Rate of New Zealand Withholding Tax on Equities

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 are a client of Clearstream and hold or may in the future hold New Zealand equities in the Account with Clearstream.

For dividend payments made on New Zealand equities, we acknowledge that the non-resident withholding tax rate (NRWT) of New Zealand is 30% and that Clearstream applies by default a 15% withholding tax rate at source on dividend payments for New Zealand equities.

We hereby acknowledge that, for the purpose of obtaining Clearstream's default rate of 15% for New Zealand equities, we must submit to Clearstream this "Request for Application of a Reduced Rate of New Zealand Withholding Tax on Equities" once and we hereby accept that our positions for which we did not submit this one-time certificate will be taxed at the maximum rate of 30%.

If beneficial owners are subject to a different tax rate, due to a different tax residency or eligibility for tax exemption under New Zealand domestic law, or non-eligibility for a reduced rate of NRWT, we hereby certify that we will submit to Clearstream, in addition to this one-time certificate, no later than the deadlines prescribed by Clearstream, via Swift or other agreed authenticated means of communication:

- A breakdown of holdings with the tax rates to be applied on payment date; and, if applicable
- Certification issued by the New Zealand Inland Revenue Department proving the eligibility of beneficial owners for exemption under the relevant New Zealand domestic law.

Furthermore, we hereby certify that we shall, **upon request**, submit the following documentation to Clearstream:

- A "Tax Certificate for New Zealand Equities" including a list of beneficial owners that obtained a reduced rate of NRWT, in the format prescribed by Clearstream Banking in the Clearstream Client Tax Guide for New Zealand; and
- Proof of tax residence for beneficial owners eligible to obtain a reduced rate of withholding tax at source in accordance with a Double Taxation Treaty (DTT) between their country of residence and New Zealand; and
- Any other tax documentation required from time to time.

We hereby certify that we hold the New Zealand equities for beneficial owners (including ourselves, when applicable) that are not New Zealand residents for tax purposes.

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 at source or quick refund claimed, based on the applicable tax laws and regulations in the New Zealander market;
- such related tax relief entitlement to any related tax relief at source or quick refund is valid for any such Securities sourced in the New Zealander 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 at source or quick refund is not restricted by any contractual obligation such as a lending or collateral arrangement

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<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.

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We accept full liability and responsibility for any claims of whatever nature, including, but not limited to, claims for additional taxes, interest thereon or penalties imposed by tax authorities, subsequent to or resulting from the present certification and/or our application for a lower rate of withholding tax to be obtained in accordance with the above procedure.

We irrevocably appoint Clearstream and Clearstream's depository as our attorneys-in-fact with the authority to collect and to submit this certificate, a statement of the balance of New Zealand equities recorded on the Account, as well as any documents related thereto and including the names and tax residences of the beneficial owner(s), to the appropriate New Zealand authorities in connection with any tax, judicial or administrative proceeding; we understand that the New Zealand authorities may transmit parts or all of this information to the relevant authorities (including tax authorities) of the beneficial owner's country of residence.

We will notify Clearstream immediately, but in any case before the applicable payment date, if there is a change, with regard to the ownership of the above New Zealand equities, in the eligibility of such holdings in the Account.

We will notify Clearstream immediately of any information rendering this declaration incorrect, untrue or incomplete and will provide Clearstream upon request with any document required in the future for the above purposes.

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.

We irrevocably authorise Clearstream to debit the Account with any amount (including, if applicable, any additional taxes, interest or penalties imposed) that the New Zealand authorities may claim back in relation to this request for application of the lower rate of withholding tax. Before requesting that the above-mentioned account be closed, we undertake to provide Clearstream with an alternative debit authorisation. This Request 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:

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

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

\_\_\_\_\_

### By (authorised signatories):

\_\_\_\_\_  
Authorised signature

\_\_\_\_\_  
Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Place

\_\_\_\_\_  
Authorised signature

\_\_\_\_\_  
Name

\_\_\_\_\_  
Title

\_\_\_\_\_  
Date (DD/MM/YYYY)