

One-Time Certificate for South Korea Government Bonds (KGB) and Monetary Stabilisation Bonds (MSB)

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(s)")

We, the undersigned client of Clearstream, may hold from time to time in our Account(s) South Korea Government Bonds (KGB) and Monetary Stabilisation Bonds (MSB) (the "Securities").

For the purpose of ensuring that we are eligible to hold KGB and MSBs in Clearstream, we hereby certify that *(tick one box only)*:

1. ☐ We are the beneficial owner of any such Securities that we may hold from time to time in the Account(s).

1.1 ☐ We, the beneficial owner, are a foreign corporation or non-resident eligible for exemption from South Korea withholding tax due to our status that is *(tick as appropriate)*:

- a. ☐ Public Overseas Investment Vehicle (OIV deemed as beneficial owner).
- b. ☐ Private Overseas Investment Vehicle (OIV deemed as beneficial owner).
- c. ☐ Central or local government or public institution.
- d. ☐ Pension fund(s).
- e. ☐ Financial institution(s):
 - i.) ☐ Investment.
 - ii.) ☐ Insurer.
 - iii.) ☐ Bank.
 - iv.) ☐ Other.
- f. ☐ Other corporate entity.

OR

1.2 ☐ We the beneficial owner are *(tick as appropriate)*:

- a. ☐ A South Korean resident financial institution that qualifies as a domestic investment dealers according to the Article 8(2) of the FINANCIAL INVESTMENT SERVICES AND CAPITAL MARKETS ACTS that has obtained the approval from the Financial Service Commission (FSC) for trading the Securities. We further certify that:
 - o We have obtained a Legal Entity Identified Number;
 - o We are responsible for the withholding, payment and reporting of any South Korean corporate income tax applicable to interest income derived from the Securities and we will comply with the applicable requirements;
 - o We will settle and safekeep the Securities as proprietary assets;
 - o The Securities will not be used in our Account for collateral, securities lending or repo activities;
 - o We will not settle transactions with the Securities with other Korean Domestic Financial Institutions through Clearstream.

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 and Clearstream Europe AG clients) 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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- b. ☐ A South Korean Branch of a foreign financial institution that qualifies as a domestic investment dealers according to the Article 8(2) of the FINANCIAL INVESTMENT SERVICES AND CAPITAL MARKETS ACTS that has obtained the approval from the Financial Service Commission (FSC) for trading the Securities. We further certify that:
- We have obtained a Legal Entity Identified Number or we will be able to use one of our parent company;
 - We are responsible for the withholding, payment and reporting of any South Korean corporate income tax applicable to interest income derived from the Securities and we will comply with the applicable requirements;
 - We will settle and safekeep the Securities as proprietary assets;
 - The Securities will not be used in our Account for collateral, securities lending, repo activities;
 - We will not settle transactions with the Securities with other Korean Domestic Financial Institutions through Clearstream.

In addition, we certify that 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 South Korean market;
- such related tax relief entitlement to any related tax relief is valid for any such Securities sourced in the South Korean 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

Details of the sole beneficial owner (ourselves):

Full name of beneficial owner *(strictly the same as per IRC/LEI)*:

Full address of beneficial owner for tax purposes *(complete street address including postal code, city, country)*:

Country of Residence *(ISO Alpha-2 Country Code)*:

Taxpayer ID No. *(IRC number if available or LEI)*:

Full address for South Korean establishment *(complete street address including postal code, city, country)*:

LEI of South Korean permanent establishment:

We hereby acknowledge that, for the purposes of obtaining the appropriate exemption, we must submit to Clearstream, in addition to this one-time certificate, any additional documentation that may be required by Clearstream, the depository and/or the Tax authorities.

We further acknowledge and agree that, as a Korean resident financial institution or a Korean branch of a foreign institution, we are solely responsible for the use of any safekeeping accounts obtained through Clearstream. Accordingly, we accept full responsibility for ensuring that any safekeeping account used in our instructions belongs to the correct investor, and we agree that Clearstream shall not be held liable in any circumstance where a safekeeping account is used on behalf of an investor other than the one for whom the relevant transaction has been or is deemed to have been executed or settled.

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2. ☐ We, as an eligible Intermediate Custodian Foreign financial Institution (CFI), are not the beneficial owner of any such Securities that we may hold from time to time in the Account(s) and we hold the Securities as intermediary exclusively for the beneficial owner(s) that is(are) a foreign corporation(s) or non-resident(s) eligible for exemption from South Korea withholding tax; **or**

We, as an eligible Intermediate Custodian Foreign financial Institution (CFI), are not the beneficial owner of any such Securities that we may hold from time to time in the Account(s). We are acting as CFI through another eligible CFI or through multiple eligible CFIs. We confirm the last CFI in the custody chain holds the Securities for the beneficial owner(s) that is(are) a foreign corporation(s) or non-resident(s) eligible for exemption from South Korea withholding tax.

We, the Clearstream client named below, is acting in its capacity as an eligible CFI and confirm that our status is *(tick as appropriate)*:

- a. ☐ Central or local government(s) or public institution(s),
- b. ☐ Financial institution(s)
 - i.) ☐ Investment,
 - ii.) ☐ Insurer,
 - iii.) ☐ Bank,
 - iv.) ☐ Other.
- c. ☐ Other corporate entity(ies).

Details of Clearstream client (CFI):

Full name of Clearstream client *(strictly the same as per IRC/LEI)*:

Full address of Clearstream client for tax purposes *(complete street address including postal code, city, country)*:

Country of Residence *(ISO Alpha-2 Country Code)*:

Taxpayer ID No. *(IRC number if available or LEI)*:

We further certify that all underlying intermediaries fulfill the necessary requirements to be an eligible Intermediate Custodian Foreign financial Institution(s) (CFI(s)) as per Article 132-3(1) of the Enforcement Decree of the Corporate Tax Act and Article 179-3(1) of the Enforcement Decree of the Income Tax Act, (when applicable) and that all final beneficial owners are foreign corporation(s) or non-resident(s) eligible for exemption from South Korea withholding tax.

We hereby acknowledge that, for the purposes of obtaining the appropriate exemption, we must submit to Clearstream, in addition to this one-time certificate, any additional documentation that may be required by Clearstream, the depository and/or the Tax authorities. We certify that as CFI we endorse due diligence responsibilities and that we are fully aware of all our responsibilities and liabilities due to our status. We confirm that we perform all the duties of an intermediary as defined in the Enforcement Decree of the Corporate Tax Act and the Enforcement Decree of the Income Tax Act.

We hereby acknowledge that, as a CFI, we must submit **immediately (without any delays)** any information and documentation in relation to and/or on behalf of the beneficial owner(s), if required from time to time by Clearstream, the depository and/or the Tax authorities.

We further agree that we shall immediately (without any delays) advise Clearstream in case of change of circumstances.

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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 and either to obtain renewals of such certification or, immediately on expiration of such certification, to provide instructions to have the correct applicable South Korea withholding tax deducted and that Clearstream has no responsibility or liability in this regard.

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

- I. perform all acts necessary to claim any exemption from or reduced rate of, withholding tax to which the beneficial owners are entitled pursuant to the relevant tax treaty or under the South Korea national law and which may be claimed on our behalf based on the above certifications;
- II. provide, directly or indirectly, to the South Korea tax authorities or any party authorised to audit or conduct a similar control of Clearstream for tax purposes a copy of this One-Time Certificate and other certification provided pursuant to this One-Time certificate and to disclose to such tax authorities any additional information that Clearstream may have in its possession that is relevant to the beneficial owner's 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;
 - 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 hereby undertake to notify Clearstream promptly upon receipt of any information that would render any statement in this certificate or in the documents submitted from time to time in relation to the Securities untrue or incomplete.

We further agree that we shall provide directly to any such tax authorities, upon their request, such information that we may have in our possession that is relevant to determining whether any beneficial owner that holds through a direct account with us, qualifies for any such benefits claimed.

We further certify that we are subject to Know Your Customer Rules with respect to the direct account holders for which relief at source request will be made pursuant to this One-Time Certificate.

We agree that we will not make a request for a reduction or exemption from withholding tax with respect to a beneficial owner, if we know or should have known that the documentation provided by our direct account holder, is unreliable or incorrect.

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 South Korea tax authorities and that the South Korea tax authorities may provide the information to the country in which the beneficial owners are resident for tax purposes.

We further acknowledge, that if Clearstream determine 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 authorise Clearstream 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 Clearstream holds for us.

We hereby acknowledge and agree that Clearstream, in acting in compliance with the terms of this One-Time

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Certificate, shall not be liable or responsible for any losses, damages, costs, expenses, claims or liabilities hereunder.

We undertake to advise the Clearstream 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 Clearstream with suitably updated certification immediately.

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 or any other certificate or statement provided pursuant to this One-Time Certificate entitled to relief at source and therefore to indemnify, exonerate and hold Clearstream 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 Clearstream in respect of any penalties, taxes and interest thereon, levied by the South Korea 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.

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.

Clearstream is fully relying on the documentation and certification provided by the client and should be indemnified by the client for any penalties or losses faced by Clearstream due to a false declaration from the client, should it be in this One-Time Certificate or any related document provided by the client to prove the entitlement to the tax exemption of the relevant parties.

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 there to.

For and on behalf of:

Name of Clearstream client:

Address (complete street address including postal code, city, country):

Client account number(s):

Authorised signatories:

Authorised signature

Authorised signature

Name

Name

Title

Title

Place

Date (DD/MM/YYYY)