Request for Application of a Reduced Rate of Australian Withholding Tax on Interest Payments

(for bonds not compliant with Section 128F of the Australian Income Tax Assessment Act 1936)

Clearstream Europe AG
Mergenthalerallee 61
65760 Eschborn
Germany

Please mail the completed and signed Certificate to:

Clearstream Services Prague Branch
Tax Services Prague
Futurama Business Park
Building B
Sokolovska 662/13b
18600 Prague 8
Czech Republic

Clearstream Europe[1] account(s):____ (the "Account")

We are a client of Clearstream Europe and hold or may in the future hold Australian Commonwealth Treasury Bonds, semi-government Australian securities or Australian corporate bonds not compliant with Section 128F of the Australian Income Tax Assessment Act 1936 (the "Securities") in the Account on behalf of one or more beneficial owners.

Please complete only PART A - Segregated account per pool; ***or***
only PART B - Omnibus account; ***or*** *only PART C - Segregated account per beneficial owner.*

PART A - Segregated account per pool - *(If you complete PART A, please leave PART B and PART C blank.)*

We hereby certify that all beneficial owners of the Securities are exclusively *(tick* ***one*** *box only)*:

A.1 ☐ **Non-residents of Australia** for tax purposes and eligible to benefit from 10% on interest payments from the securities.

After submission of this Request and in the absence of notification, breakdown or additional certification received by Clearstream Europe from us, we irrevocably authorise Clearstream Europe to consider by default on each relevant interest payment date the entire holding as being beneficially owned by non-residents of Australia and apply the above-mentioned tax rates.

A.2 ☐ **Undisclosed Australian residents not eligible for a reduced rate** of Australian withholding tax.

After submission of this Request and in the absence of notification, breakdown or additional certification received by Clearstream Europe from us, we irrevocably authorise Clearstream Europe to apply by default, on each relevant interest payment date and on the entire holding, the maximum withholding tax rate applicable for undisclosed Australian residents.

A.3 ☐ **Residents of Australia** for tax purposes in accordance with the Australian Income Tax Assessment Act 1936:

- The per-payment Breakdown of Holdings must include the full names of the beneficial owners and their tax identification number (ABN/TFN), in addition to their holdings and the tax rate to be applied (that is, 0%).

[1] Clearstream Europe refers to Clearstream Europe AG 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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A.4 ☐ **Eligible for tax exemption** under Australian domestic law or are international organisations immune from Australian withholding tax under the International Organisations (Privileges and Immunities) Act 1963:

- A Certificate of Exemption, issued by the Australian Tax Authorities once before the first payment date, must be submitted; and
- The per-payment Breakdown of Holdings must include the full name of the beneficial owner in addition to their holdings and the tax rate to be applied (that is, 0%).

A.5 ☐ **Financial institutions** eligible for tax exemption according to a Double Taxation Treaty (DTT):

- The per-payment Breakdown of Holdings must include the full names of the beneficial owners, their full address for tax purposes, including street address, postal code and country, their status and eligibility according to the DTT between their country of residence and Australia, in addition to their holdings and the tax rate to be applied (that is, 0%).

By submitting the above-mentioned per-payment Breakdown of Holdings for the eligible financial institution, we certify that the beneficial owner is a financial institution unrelated to and dealing wholly independently with the payer.

Furthermore, we acknowledge that the criteria for a "financial institution" may vary from treaty to treaty and, consequently, we hereby certify that the beneficial owner is eligible for tax exemption according to the criteria specific to the DTT in force between the above-mentioned country of residence and Australia.

For the types of beneficial owner indicated in **A.3**, **A.4** and **A.5** above, we hereby acknowledge that, for the purpose of obtaining the appropriate reduced rates, we must submit to Clearstream Europe, in addition to this Request and no later than the deadlines prescribed by Clearstream Europe, via Swift or other agreed authenticated means of communication, a per-payment Breakdown of Holdings confirming the quantity of the securities held and the tax rates to be applied, as well as any other required documentation as indicated.

PART B - Omnibus account - *(If you complete PART B, please leave PART A and PART C blank.)* ☐

Beneficial owners are several and are subject to different tax rates.

We hereby acknowledge that, for the purposes of obtaining the appropriate reduced rates, we must submit to Clearstream Europe, in addition to this Request and no later than the deadlines prescribed by Clearstream Europe, via Swift or other agreed authenticated means of communication, a per-payment Breakdown of Holdings confirming the quantity of the securities held and the tax rates to be applied, as well as any other required documentation as indicated for the following types of beneficial owner:

B.1 **Undisclosed Australian residents not eligible for a reduced rate** of Australian withholding tax:

- The per-payment Breakdown of Holdings must include the quantity of the securities held and the tax rate to be applied.

B.2 **Residents of Australia** for tax purposes in accordance with the Australian Income Tax Assessment Act 1936:

- The per-payment Breakdown of Holdings must include the full names of the beneficial owners and their tax identification number (ABN/TFN), in addition to their holdings and the tax rate to be applied (that is, 0%).

B.3 **Eligible for tax exemption** under Australian domestic law or international organisations immune from Australian withholding tax under the International Organisations (Privileges and Immunities) Act 1963:

- A Certificate of Exemption, issued by the Australian Tax Authorities once before the first payment date, must be submitted; and
- The per-payment Breakdown of Holdings must include the full name of the beneficial owner(s) in addition to their holdings and the tax rate to be applied (that is, 0%).

B.4 **Financial institutions** eligible for tax exemption according to a Double Taxation Treaty (DTT):

- The per-payment Breakdown of Holdings must include the full names of the beneficial owners, their full address for tax purposes, including street address, postal code and country, their status and eligibility according to the DTT between the country of residence of the beneficial owner and Australia, in addition to their holdings and the tax rate to be applied (that is, 0%).

By submitting the above-mentioned per-payment Breakdown of Holdings for eligible exempt financial institutions, we certify that the beneficial owner is a financial institution unrelated to and dealing wholly independently with the payer.

Furthermore, we acknowledge that the criteria for a "financial institution" may vary from treaty to treaty and, consequently, we hereby certify that the beneficial owner is eligible for tax exemption according to the criteria specific to the DTT in force between the above-mentioned country of residence and Australia.

PART C - Segregated account per beneficial owner- *(If you complete PART C, please leave PART A and PART B blank.)*
We hold the Securities exclusively for the following sole beneficial owner:

Full name of beneficial owner: ______________________________

Full address of beneficial owner: ______________________________

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Address of beneficial owner for tax purposes: ______________________________

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We hereby certify that the sole beneficial owner is *(tick* one *box only and complete as necessary)*:

C.1 ☐ **Non-residents of Australia** for tax purposes and eligible to benefit from 10% on interest payments from the securities.

C.2 ☐ **Undisclosed Australian residents not eligible for a reduced rate** of Australian withholding tax and future income payments will be subject to the maximum withholding tax rate applicable for undisclosed Australian residents.

C.3 ☐ **Resident of Australia** for tax purposes in accordance with the Australian Income Tax Assessment Act 1936 and eligible to benefit from 0% withholding tax:

- Australian Tax File Number (TFN): ______________________________
- Australian Business Number (ABN): ______________________________

C.4 ☐ **Eligible for tax exemption** under Australian domestic law or an international organisation immune from Australian withholding tax under the International Organisations (Privileges and Immunities) Act 1963 and so subject to 0% rate.

We acknowledge that a valid Certificate of Exemption, issued by the Australian Tax Authorities, must be provided to Clearstream Europe once before the first payment date.

C.5 ☐ **Financial institution** eligible for exemption according to the Double Taxation Treaty (DTT) between

_________________________ (the country of residence of the beneficial owner) and Australia and so subject to 0% rate.

We certify that the beneficial owner is a financial institution, unrelated to and dealing wholly independently with the payer.

Furthermore, we acknowledge that the criteria for a "financial institution" may vary from treaty to treaty and, consequently, we hereby certify that the beneficial owner is eligible for tax exemption according to the criteria specific to the DTT in force between the above-mentioned country of residence and Australia.

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 Australian 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 Australian 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

General:

After submission of this Request (and a Certificate of Exemption, if applicable) and in the absence of notification, breakdown or additional certification received by Clearstream Europe from us, we irrevocably authorise Clearstream Europe to consider by default on each relevant interest payment date the entire holding as being beneficially owned as indicated above and apply the applicable tax rates.

We hereby acknowledge and accept that, if this Request, as well as any other required documentation as indicated for the specific types of beneficial owners, is not received by Clearstream Europe within the prescribed deadlines, the income payment will be subject to taxation at the Clearstream Europe default rate (that is, 10%).

Furthermore, we hereby certify that, for beneficial owners that are:

- Disclosed Australian residents; or
- Entities eligible for exemption under Australian domestic law or immune from Australian withholding tax under the International Organisations (Privileges and Immunities) Act 1963; or
- Financial institutions eligible for exemption according to Double Taxation Treaty (DTT); we shall, **upon request**, submit the following documentation to Clearstream Europe:
- A list of beneficial owners who have obtained exemption or a reduced rate of Australian withholding tax; and
- Proof of tax residence for beneficial owners who are eligible to obtain a reduced rate of withholding tax at source in accordance with the Australian Income Tax Assessment Act 1936; and
- Certification proving the eligibility of beneficial owners for exemption under the relevant Australian domestic law; and
- A Certificate of Exemption, issued by the Australian Tax Authorities (the issuance date must cover the interest payment date); and
- Any other tax documentation required from time to time.

We acknowledge that this certification is required in connection with Australian law.

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We irrevocably authorise Clearstream Europe and Clearstream Europe's depository in Australia to rely on the information contained in this certificate unless and until we notify you that the information is no longer true and correct by advising you before the respective interest payment date of any holdings to be excluded from the present certificate, if applicable.

We confirm that, for the part of the Securities of which we are not the beneficial owner, we have received a certificate substantially similar to this certificate from the holders/beneficial owners on whose behalf we are acting.

We hereby appoint Clearstream Europe and Clearstream Europe's depository for Australian debt securities as our attorneys-in-fact with the authority to collect and forward this certificate or a copy hereof and any other document submitted in connection herewith to the competent Australian authorities, including the Australian Tax Office, in connection with any administrative or legal proceedings or official inquiries for which this certificate is or would be relevant.

We hereby accept full responsibility in the event of any claims or additional taxes, interest thereon or penalties levied by tax authorities in connection with any payments made subject to this certification, including any additional information provided in connection to it.

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 Europe client named below. We will immediately inform Clearstream Europe of any change in the information provided in this certificate and any certificate related to this 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 Request is governed and construed in accordance with the laws of Germany and the courts of Germany shall have exclusive jurisdiction for all legal proceedings relating thereto.

For and on behalf of:

Name of Clearstream Europe client:______________________________

Address: ______________________________

____

Client account number: ______________________________

By (authorised signatories):

Authorised signature	Authorised signature
Name	Name
Title	Title
Place	Date (MM/DD/YYYY)