



## Attestation

This attestation requests the application at source of the withholding tax exemption for dividends paid by ageas NV/SA under Article 10,(4),(b) of the Belgium – United States of America Double taxation Convention of 27 November 2006 (the “**Tax Treaty**”).

### Identification of the issuer of the income:

- Full name and legal form: ageas SA/NV
- Registered office: Avenue du Boulevard 21, 1210 Brussels, Belgium
- Enterprise number: 0451.406.524
- ISIN code: BE0974264930

### Description of the income:

- Number and form of the ageas SA/NV shares in relation to which the dividend withholding tax exemption is being claimed:.....(hereinafter the “**Shares**”).
- Dividend pay date:.....
- Coupon number: .....
- Number of coupons:.....
- Net dividend per coupon:.....
- Total net dividend:.....

The dividends as described above, to which this attestation relates, are hereinafter referred to as the “**Dividends**”.

### The undersigned, acting on behalf of:

- Full name and legal form: .....
- Registered office or seat of management: .....
- Tax identification number (TIN), if applicable: .....

Hereinafter the “**Pension Fund**”;

### Confirms, with respect to the application of the withholding tax exemption under Article 10,(4),(b) of the Tax Treaty, that:

- the Pension Fund is entitled to claim the withholding tax exemption under Article 10,(4),(b) of the Tax Treaty;



- with regard to the Dividends, the Form 276 Div.-Aut.<sup>1</sup> is attached to the present attestation and has been duly completed; and,
- on the date the Dividends are attributed or made payable:
  - (i) the Pension Fund qualifies as a “pension fund” in the meaning of Article 3,(1),(k) of the Tax Treaty;
  - (ii) the Dividends are not derived from the carrying on of a business by the Pension Fund or through an associated enterprise;
  - (iii) the Pension Fund is entitled to claim the benefits of the Tax Treaty (including the withholding tax exemption under Article 10,(4),(b) of the Tax Treaty), pursuant to Article 21 of the Tax Treaty; and
  - (iv) the Pension Fund does not exercise any control over ageas SA/NV.

**In addition, the following documents are attached to the present attestation:**

- the duly completed and certified Form 276 Div.-Aut. with regard to the Dividends (*cf. supra*);
- a certificate of residence 6166<sup>2</sup> issued by the International Revenue Service (United States of America); and,
- any document the Pension Fund possesses and which can prove that it effectively qualifies as a pension fund within the meaning of Article 3,(1),(k) of the Tax Treaty.

Place and date of signature: at ....., on ...../...../.....

Name and capacity: .....

Signature(s):.....

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<sup>1</sup> This form can be downloaded from the ageas SA/NV website or the website of the Federal Public Service Finance of Belgium (<https://eservices.minfin.fgov.be/>).

<sup>2</sup> In order to obtain such a certificate of residence 6166, it is required to complete the so-called Form 8802. This form can be downloaded from the website of the United States of America International Revenue Service (<https://www.irs.gov/pub/irs-pdf/f8802.pdf>).