



## Attestation

This attestation requests the application at source of the dividend withholding tax exemption under Article 264/1 of the Belgian Income Tax Code 1992 (the “**BITC**”) on dividends paid by ageas SA/NV.

### 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 “**Company**”;

### Confirms, with respect to the application of the withholding tax exemption under Article 264/1 BITC, that:

- the Company is entitled to claim the withholding tax exemption under in Article 264/1 BITC; and,
- on the date the Dividends are attributed or made payable:
  - (i) the Company is established in a Member State of the European Economic Area other than Belgium or in a State with which Belgium has concluded a Tax Treaty,

provided that this Tax Treaty (or any other treaty Belgium has concluded with that State) provides for the exchange of information which is necessary to give effect to the provisions of the domestic laws of the Contracting States;

- (ii) the Company has a legal form as listed in the Annex I, part A of the Council Directive of 30 November 2011 (2011/96/EU) on the common system of taxation applicable in the case of parent companies and subsidiaries of different Member States, as amended by the European Council Directive (2014/86/EU) of 8 July 2014<sup>1</sup>, or a legal form similar to the ones listed in this Annex and governed by the laws of a Member State of the European Economic Area other than Belgium, or by the laws of a State with which Belgium has concluded a Tax Treaty;
- (iii) the extent to which the Company would – in the absence of the withholding tax exemption under Article 264/1 BITC – in principle be able to credit any withholding tax that would be due on the Dividends, or to obtain a refund thereof according to the legal provisions in force on 31 December of the year preceding the year in which the Dividends are attributed or made payable, is ...../.....<sup>2</sup>;
- (iv) the Company is subject to corporate income tax or a similar tax, without benefiting from a tax regime that deviates from the ordinary domestic tax regime;
- (v) the Company holds a participation of less than 10% in the capital of ageas SA/NV, but with an acquisition value of at least EUR 2.500.000 (*i.e.* EUR two and a half million);
- (vi) the Dividends relate to Shares which the Company has held or will hold in full legal ownership for an uninterrupted period of at least one year; whereby either<sup>3</sup>:

the one year minimum holding period was met for all Shares on the date of this attestation;

the one year minimum holding period was not yet met for any of the Shares on the Date of this attestation (but it will be met in the future cf. (vii) below);  
or,

the one year minimum holding period was met for part of the Shares on the date of this attestation and the following breakdown applies:

	Holding period met	Holding period not met
Number of coupons	.....	.....

<sup>1</sup> It being understood that with respect to companies under Belgian law referred to in section b of said Annex I, part A, references to "besloten vennootschap met beperkte aansprakelijkheid", "coöperatieve vennootschap met beperkte aansprakelijkheid", "coöperatieve vennootschap met onbeperkte aansprakelijkheid" and to "gewone commanditaire vennootschap" should also be understood as referring to "besloten vennootschap", "coöperatieve vennootschap" and "commanditaire vennootschap" respectively.

<sup>2</sup> Please state the ratio of the amount which would be creditable or refundable, if applicable.

<sup>3</sup> Please indicate which scenario applies and, where necessary, the relevant amounts.

	Holding period met	Holding period not met
Total net dividend	.....	.....

(vii) only insofar the one year minimum holding period under (vi) above has not yet been met on the date of this attestation, the Company commits:

- a. to hold the relevant Shares in full legal ownership uninterruptedly until the completion of the one year minimum holding period;
- b. to immediately notify ageas SA/NV of the completion of the one year minimum holding period; and,
- c. to immediately notify ageas SA/NV should the Company cease to hold full legal ownership of the relevant participation before the completion of the one year minimum holding period.

If the Company has not held the Shares in full legal ownership for an uninterrupted period of at least one year at the time the Dividends are attributed or made payable, ageas SA/NV will pay the Dividends less withholding tax at the standard Belgian withholding tax rate applicable at that time. It will pay the amount of withholding tax deducted at source to the Company, once the Shares have been held for the one year minimum period.

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

Name and capacity: .....

Signature(s):.....