



## Attestation

This attestation requests the application at source of the dividend withholding tax exemption for foreign pension funds under Article 106, §2 of the Belgian Royal Decree implementing the Income Tax Code 1992 (“**RD/BITC**”) for dividends paid by Ageas SA/NV.

### Identification of the issuer:

- Full name and legal form: Ageas SA/NV
- Registered office: Markiesstraat 1, 1000 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 106, §2 RD/BITC, that:

- the Pension Fund is entitled to claim the withholding tax exemption under Article 106, §2 RD/BITC; and,
- on the date the Dividends are attributed or made payable, the Pension Fund:
  - (i) is the full legal owner or the usufruct holder of the Shares;
  - (ii) is a non-resident saver in the meaning of Article 227, 3° of the Belgian Income Tax Code (“**BITC**”), whose object consists solely of managing and investing



funds collected in order to pay legal or complementary pensions, whose activity is limited to the investment of funds in the exercise of its statutory purpose without any profit making aim, and which is exempt from income tax in its country of residence; and,

- (iii) does not fall under the exceptions to the withholding tax exemption requested as described under Article 106, §4 RD/BITC, meaning that the Pension Fund is not:
  - a. subject to a contractual obligation to transfer the revenues from the Shares that it manages in its own name to an ultimate beneficiary, except if the ultimate beneficiary is itself a non-resident saver in the meaning of Article 106, §2 RD/BITC; or,
  - b. obliged to pay an income as referred to in Article 90, 11° BITC, *i.e.* a manufactured coupon/manufactured dividend/market claim, with respect to the Shares which it holds under a stock loan to an ultimate beneficiary, except if the ultimate beneficiary is itself a non-resident saver in the meaning of Article 106, §2 RD/BITC or a parent company of the company distributing the Dividends within the meaning of Article 106, §5 or §6 RD/BITC.
- (iv) has held the Shares in full legal ownership for an uninterrupted period of at least 60 days, either:
  - a. on the date at which the Dividends were attributed or made payable; or,
  - b. on a date within the period of 15 days as from the date at which the Dividends were attributed or made payable.

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

Name and capacity: .....

Signature(s):.....