

Tax services

STATEMENTS FOR TAX PURPOSES BY JURISDICTION (THE « TAX STATEMENTS »)

This list of documents only applies to natural persons.

In the case of accounts with several holders, statements shall be prepared based on all assets unless otherwise specified in the list below.

The list of documents mentioned below is subject to modifications at any time according to legislative changes in the concerned countries.

The fees corresponding to each of the tax services are debited directly from the Client assets according to the applicable fee schedule.

Information relating to the delivery of securities: If securities are transferred, the Client undertakes to provide the acquisition costs and dates of the securities transferred. In the absence of this information, the full amount of the transfer will be taken into account for the purposes of capital gains tax.

Client's residence	List of available Tax Documents
South Africa	Annual tax statement providing the following information: <ul style="list-style-type: none"> - Documentation supporting the tax return - Statements of income and capital gains or losses - Asset statement - Breakdown of expenses Breakdown of transactions with a tax impact by instrument
Argentina	Annual tax statement providing the following information: <ul style="list-style-type: none"> - Income Statement - Distributions from redemptions of financial instruments - Statement of capital gains and losses - Charge details - Assets and Rights Statement - Transaction lists
Germany	Annual tax statement (Steuerverzeichnis)

Belgium	<p>Annual tax statement providing the following information:</p> <ul style="list-style-type: none"> - Statement of income from movable capital to be declared - Detailed annex confirming the income <p>Monthly statement on Belgian Stamp duty (if applicable)</p>
Brazil	<p>Annual tax statement providing the following information:</p> <ul style="list-style-type: none"> - Income from non/financial instruments - Income from financial instruments - Capital gains - Capital losses - Statement of financial position - List of transactions <p>Monthly tax statement providing the following information:</p> <ul style="list-style-type: none"> - Income from non/financial instruments - Income from financial instruments - Capital gains - Capital losses - List of transactions <p>Annual CBE (BACEN) statement</p>
Spain	<p>Annual tax statement providing the following information:</p> <ul style="list-style-type: none"> - Detailed income statement - Statement of income deriving from the transfer of financial assets - Statement of capital gains and losses - List of transactions - Statement of financial position - Breakdown of deductible expenses <p>Annual statement – Modelo “ETE”</p> <p>Annual statement – Modelo “D6”</p> <p>Annual statement – Modelo “720”</p> <p>Annual statement – Modelo “117”</p>

France	<p>Annual tax statement providing the following information:</p> <ul style="list-style-type: none"> - Documentation supporting the tax return (percentage holding taken into account) - Statement of income - Statement of capital gains and losses, together with details of the theoretical tax allowance over the holding period - Breakdown of deductible expenses <p>Monthly statement for mandatory flat-rate tax and social security contributions:</p> <ul style="list-style-type: none"> - 277k-DIV-SD and 277k-SD - IFI statement information notice <p>Tax statements for all accounts held by the Client are grouped together. These statements are provided according to the correspondence dispatch / delivery methods specified for each account for which the Client is the account holder. For joint and collective accounts, these statements are sent by post to the Client's legal domicile address, unless specified otherwise by the Client.</p>
Israel	<p>Annual tax statement providing the following information:</p> <ul style="list-style-type: none"> - Documentation supporting the tax return - Statements of income and capital gains or losses - Breakdown of expenses <p>Breakdown of transactions with a tax impact by instrument.</p>
Luxembourg	<p>Annual tax statement providing the following information:</p> <ul style="list-style-type: none"> - Documentation supporting the tax return - Breakdown of income from movable capital - Breakdown of miscellaneous income - Breakdown of debit interest

Mexico	<p>Annual tax statement providing the following information:</p> <ul style="list-style-type: none"> - Income resulting from paid dividends - Income resulting from paid interests - Interest results from sales and redemptions of debt securities - Realised capital gains and losses excluding derivatives and debt securities - Realised gains and losses on derivatives - Asset statements - Transaction lists <p>Monthly tax statement providing the following information:</p> <ul style="list-style-type: none"> - Income resulting from paid dividends - Asset statements
Netherland	<p>Annual tax statement providing the following information:</p> <ul style="list-style-type: none"> - Statement of income - Breakdown of accrued interest - Statement of financial position
Portugal	<p>Annual tax statement providing the following information:</p> <ul style="list-style-type: none"> - Documentation supporting the tax return - Statements of income and capital gains or losses - Breakdown of expenses <p>Breakdown of transactions with a tax impact by instrument.</p>
Switzerland Ordinary tax regime	<p>Full annual tax statement for a tax return to be filed under the ordinary tax system. This will include:</p> <ul style="list-style-type: none"> - Full securities and debt statement - Flat/rate taxation (DA-1 / DA-2) - Breakdown of deductible expenses - Full summary statement

Clients benefiting from the tax refund services also receive the following appendices, depending on the country from which the revenue originates.

Client's residence	Appendices to the Tax Documents
All Countries	<p>Appendix to the request for the refund of Swiss withholding tax, namely a detailed statement including"</p> <ul style="list-style-type: none"> - List of Swiss sourced income: dividends, interest, cash. - Amounts" gross, withholding tax and recoverable amount.
All Countries	<p>Appendix to the request for the refund of foreign tax, namely a detailed statement including"</p> <ul style="list-style-type: none"> - List of income from foreign (non/Swiss securities on which tax has been withheld at source: dividends, interest. - Amounts: gross, withheld at source, recoverable amount.

TAX REFUNDS

If the Client is entitled, by virtue of Double Taxation Agreements (DTA) or applicable domestic law, to a reduction or exemption in the amount of withholding tax on the income from its assets, Cité Gestion may assist the Client in obtaining, to the extent possible, the reduced rate of withholding tax upon payment of the income or, more generally, the reimbursement of the recoverable portion of the withholding tax (except for U.S. securities, i.e. securities that may generate U.S. source income).

1. CONDITIONS OF APPLICATION OF THE SERVICE

List of Countries for which the Tax Refund Services are available

Germany	Austria	Belgium	Spain	Finland	France	Ireland
Luxembourg	Norway	Netherlands	Portugal	Sweden	Switzerland	

2. MINIMUM ANNUAL REQUIREMENTS

In order for the Client to benefit from this Service, the refundable amounts must reach a minimum annual requirement set by country.

3. SPECIFIC REQUIREMENTS FOR CERTAIN ASSETS OR COUNTRIES

Cité Gestion reserves the right to refuse the processing of assets which, by their nature, are particularly complex from an administrative point of view, such as "ADRs" (American Depositary Receipts - securities issued by foreign companies that are listed on the US stock exchange), or which are deposited outside the main Cité Gestion custodian for the market in question (following cross-border delivery, for example).

4. CONDITIONS APPLICABLE TO CERTAIN SWISS ASSETS

As a general rule, only one claim for the refund of Swiss withholding tax and US back-up withholding tax may be submitted per taxpayer (Art. 64 of the Withholding Tax Ordinance for the Client's total income of Swiss and US origin respectively). It is also the Client's responsibility to provide Cité Gestion, without delay, with the supporting documents from other banks that are required for full refund of all tax withheld at source. The Client must not file an identical request separately with the Swiss tax authorities. Cité Gestion waives all liability for any fines, losses or sanctions incurred as a result of duplicate requests or the Client forfeiting their right to benefit from a tax refund.

Reclaim of Swiss withholding tax on income from Swiss law accumulation investment funds can be carried out by Cité Gestion. However, Cité Gestion shall not be liable if market practices lead to errors in respect of the recoverable amounts (late or non/existent market announcement, failure to declare reinvestment to the Federal Tax Administration, etc.).

5. SPECIFIC CONDITIONS APPLICABLE TO US ASSETS

With regard to US securities, to be able to benefit from the rate set in the double taxation agreement signed between the Client's country of tax residence and the US, the Client must apply to take advantage thereof by submitting an ad hoc form (IRS-WkBEN).

However, Cité Gestion offers no service to the Client making it possible to obtain a refund of tax withheld at source on US securities.

6. EXCLUDED ACTIVITIES

Cité Gestion may, at its sole discretion, exclude certain activities from the scope of its tax refund service. The use of securities lending immediately cancels the tax refund service in order to avoid any litigation with the tax authorities concerned (application for tax refund on securities not held by the Client at the time of payment, improper application of DTAs, etc.). Cité Gestion shall under no circumstances be liable for the fact that the Client is unable to initiate a tax litigation proceedings ("Aberdeen Case" or "Fokus Bank Case") with a foreign tax authority when the securities have been on loan.

7. RESPONSIBILITIES

The Client acknowledges that the service provided by Cité Gestion is operational in nature. This service may not be considered as constituting an opinion or Tax advice. In particular, it is the responsibility of the Client to establish in advance whether they are entitled to claim a tax refund under the DTA or applicable domestic law.

Cité Gestion shall not be liable for any negative consequences that may arise from a request for tax refund and cannot under any circumstances guarantee that the tax refund procedure will be successful, due to the fact that it is subject to the approval of the competent tax authorities in Switzerland and abroad.

In addition, Cité Gestion can, under no circumstances, be liable for the non/application of a conventional double taxation rate, due in particular to procedural limits and constraints imposed by the tax authorities in Switzerland and/or abroad.

The Client shall inform Cité Gestion of any special tax status which may grant the right to a Tax exemption or a preferential rate in respect of any given jurisdiction, as well as of any change to their

tax circumstances. If the Client benefits from a special tax status, Cité Gestion will not automatically offer the tax reclaim service.

Clients that are tax residents in Switzerland must sign a separate power of attorney to benefit from the tax reclaim service.

8. PRICING

Cité Gestion reserves the right to deduct the fees – in accordance with the tariff in force – directly from the amount of the tax refund received for the Client, including in cases where the account is closed.

9. DISCLOSURE OF CLIENT DATA TO THIRD PARTIES

The Client acknowledges and accepts that, pursuant to the requirements imposed by some tax authorities, Cité Gestion may be required to disclose certain Client data (name, address, taxpayer ID, etc.) and certain information relating to the assets covered by such requests.

As Cité Gestion uses operational infrastructure of Bank Lombard Odier & Co Ltd (“Lombard Odier”) in Geneva for the Tax Services, the Client acknowledges and accepts that, pursuant to the requirements imposed by some tax authorities, Cité Gestion may be required to disclose to Lombard Odier certain Client data (name, address, taxpayer ID, etc.) and certain information relating to the assets.

The Client understands and accepts that, depending on the country, information may sometimes be disclosed to the tax authorities by third parties (such as a sub/custodian, who may have access to the Client’s personal data (such as name, address, account statements, etc. and any other data required by the tax authorities in the relevant country).

10. MISCELLANEOUS

Changes to the Client’s tax residence or tax status shall not invalidate any steps already taken by Cité Gestion. The Client releases Cité Gestion from any liability in this regard.

In the event of account closure, Cité Gestion will terminate the tax refund service and, upon express request of the Client, send the required documents to the Client to enable them to take the necessary steps for the calendar year in which the closure occurred.

For accounts with several holders domiciled in the same jurisdiction, the rates applicable under double taxation agreements may be applied but a tax refund will be granted only if all the holders belong to the same tax household and will be filed solely at the express request of the holders.

For accounts with several holders domiciled in different jurisdictions, tax refund services cannot be applied.

For bare ownership - beneficial interest relationships, it is specified that the refund of foreign taxes can only be made at the express request of the Client, on behalf of the beneficial owner. No foreign tax refunds are made for the account of the bare owner.

In the event of death of an account holder, Cité Gestion will terminate the tax refund service. Upon written request from the heirs or testamentary executor, Cité Gestion may resume the tax refund service and request additional information regarding the estate or the heirs.

11. TERMS AND CONDITIONS OF THE TAX SERVICES

Cité Gestion reserves the right to amend the Terms and Conditions for its tax services at any time.

Furthermore, the General Terms and Conditions of Cité Gestion shall apply, particularly as regards applicable law, which shall be Swiss law exclusively, and the forum of jurisdiction, which shall be in Geneva.