



*Important Notice*  
The Depository Trust Company

<b>B #:</b>	18322-23
<b>Date:</b>	April 13, 2023
<b>To:</b>	All Participants
<b>Category:</b>	Tax Relief, Distributions
<b>From:</b>	International Services
<b>Attention:</b>	Operations, Reorg & Dividend Managers, Partners & Cashiers
<b>Subject:</b>	<b><u>Tax Relief</u></b> – Country: NETHERLANDS <b><u>Security:</u></b> STELLANTIS N.V. <b><u>CUSIP:</u></b> N82405106 <b><u>Record Date:</u></b> 04/25/2023 <b><u>Payable Date:</u></b> 05/04/2023 <b><u>Relief at Source CA Web Cut-Off:</u></b> 04/26/2023 8:00 PM ET <b><u>Quick Refund CA Web Cut-Off:</u></b> 05/19/2023 8:00 PM ET

Participants can use DTC’s Corporate Actions Web (CA Web) service to certify all or a portion of their position entitled to the applicable withholding tax rate. Participants are urged to consult TaxInfo respectively before certifying their instructions over the CA Web.

Important: Prior to certifying tax withholding instructions, participants are urged to read, understand and comply with the information in the Legal Conditions category found on TaxInfo on the CA Web.

Questions regarding this Important Notice may be directed to GlobeTax 212-747-9100.

**Important Legal Information:** *The Depository Trust Company (“DTC”) does not represent or warrant the accuracy, adequacy, timeliness, completeness or fitness for any particular purpose of the information contained in this communication, which is based in part on information obtained from third parties and not independently verified by DTC and which is provided as is. The information contained in this communication is not intended to be a substitute for obtaining tax advice from an appropriate professional advisor. In providing this communication, DTC shall not be liable for (1) any loss resulting directly or indirectly from mistakes, errors, omissions, interruptions, delays or defects in such communication, unless caused directly by gross negligence or willful misconduct on the part of DTC, and (2) any special, consequential, exemplary, incidental or punitive damages.*

*To ensure compliance with Internal Revenue Service Circular 230, you are hereby notified that: (a) any discussion of federal tax issues contained or referred to herein is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties that may be imposed under the Internal Revenue Code; and (b) as a matter of policy, DTC does not provide tax, legal or accounting advice and accordingly, you should consult your own tax, legal and accounting advisor before engaging in any transaction.*

DTCC offers enhanced access to all important notices via a Web-based subscription service. The notification system leverages RSS Newsfeeds, providing significant benefits including real-time updates and customizable delivery. To learn more and to set up your own DTCC RSS alerts, visit [http://www.dtcc.com/subscription\\_form.php](http://www.dtcc.com/subscription_form.php).



**STELLANTIS N.V.** has announced a cash dividend and Computershare, Inc. acts as the U.S. transfer agent for the company.

Participants may use DTC's Corporate Actions Web ("CA Web") instructions tab to certify all or a portion of their position entitled to each applicable withholding tax rate. Use of this instruction method will permit entitlement amounts to be paid through DTC. By making submissions of such certifications the submitter warrants that it has the required authority to make them, that the party for which the submission is made is eligible therefore, and will indemnify, as applicable, Globe Tax Services, Inc., the applicable depository, the applicable custodian, and other acting, directly or indirectly, in reliance thereon, including for any inaccuracy therein. By electing, Participants agree to the **Indemnification** below.

On pay date, all U.S. Pensions and IRAs have the opportunity to receive their full treaty benefits as outlined in the Eligibility Matrix – At-Source. All non-U.S. holders and uncertified holders will receive this dividend net of the full Dutch statutory withholding tax of 15% with the possibility to reclaim also outlined in the Eligibility Matrix Quick Refund & Long Form.

**RELIEF AT SOURCE**

VALID SCANS OF DOCUMENTATION MUST BE SENT TO [DUTCHESP@GLOBETAX.COM](mailto:DUTCHESP@GLOBETAX.COM) BY **APRIL 26, 2023, 8PM EDT** TO BE CONSIDERED ELIGIBLE FOR THE RELIEF AT SOURCE PROCESS.

**QUICK REFUND**

BENEFICIARIES CONSIDERED ELIGIBLE ARE THOSE WITH AN ASSIGNED DUTCH TAX ID #S AT THE TIME OF ESP SUBMISSION. UPON QUICK REFUND SUBMISSION, ESP WILL ADVISE BROKERS WHICH BENEFICIARIES WILL BE FILED VIA QUICK REFUND AND WHICH WILL BE MOVED TO LONG FORM.

**DIVIDEND EVENT MATRIX**

ISSUE	CUSIP#	UNDERLYING ISIN	COUNTRY OF ISSUANCE	RECORD DATE	PAY DATE	GROSS RATE EUR	GROSS RATE USD	STATUTORY WITHHOLDING RATE
STELLANTIS N.V.	N82405106	NL00150001Q9	NETHERLANDS	APRIL 25, 2023	MAY 04, 2023	EUR 1.34	USD 1.463548	15%

**FEES & DEADLINES**

FILING METHOD	BATCH	PAYMENT METHOD	CUSTODIAL FEE	DSC FEE	MINIMUM FEE PER BENEFICIAL OWNER	FINAL SUBMISSION DEADLINE
<b>RELIEF AT SOURCE</b>	PAYMENT ON PAY DATE	DTC	N/A	UP TO \$0.01 PER SHARE	\$0	<b>CA WEB/ESP ELECTION DEADLINE:</b> APRIL 26, 2023 8:00 P.M. EDT
						<b>DOCUMENTATION DEADLINE (ORIGINALS):</b> APRIL 27, 2023 5:00 P.M. EDT
<b>QUICK REFUND</b>	PRIMARY QUICK REFUND BATCH	DTC	N/A	UP TO \$0.01 PER SHARE	\$0	<b>ESP/CA WEB ELECTION DEADLINE:</b> MAY 19, 2023 8:00 P.M. EDT
<b>LONG FORM</b>	POST-CA WEB PROCESS; ONGOING	CHECK OR ACH	N/A	UP TO \$0.01 PER SHARE	\$25.00	OCTOBER 31, 2028 8:00 P.M. EDT

## INDEMNIFICATION

I / We certify that to the best of my knowledge the individual beneficial owners are eligible for the preferential rates as stated herein and I declare that I have performed all the necessary due diligence to satisfy myself as to the accuracy of the information submitted to me by these beneficial owners.

In consideration of the assistance of GlobeTax and the Issuer in processing such claims, the Participant expressly agrees that neither GlobeTax nor the Issuer nor any of their agents or affiliates shall have any liability for, and shall indemnify, defend and hold the Issuer and its respective agents and affiliates harmless from and against, any and all loss, liability, damage, judgment, settlement, fine, penalty, demand, claim, cost or expense (including without limitation fees and expenses of defending itself or enforcing this agreement) arising out of or in connection herewith. The Participant further agree that their obligations hereunder shall be free from all defenses.

# ESP



GlobeTax offers [ESP](#), an electronic withholding tax submission system. This system allows for the secure and simplified transfer of beneficial owner level data from the Participant to GlobeTax and creates applicable documentation on the Participants' behalf.

Review eligibility, document requirements, submit disclosure, print out the documents on letterhead, sign them, and mail the necessary documents to GlobeTax.

Please contact us via the [ESP Service Desk](#) at 212-747-9100 if you have any questions about this process.

## CONTACT DETAILS

PHONE NUMBER	1-212-747-9100
FAX NUMBER	1-212-747-0029
GROUP EMAIL	<a href="mailto:DUTCHESP@GLOBETAX.COM">DUTCHESP@GLOBETAX.COM</a>
COMPANY	GLOBETAX SERVICES INC.
STREET ADDRESS	ONE NEW YORK PLAZA, 34 <sup>TH</sup> FLOOR
CITY/STATE/ZIP	NEW YORK, NY 10004

## ELIGIBILITY MATRIX

### AT-SOURCE

RATE DESCRIPTION	RECLAIM RATE	ELIGIBLE RESIDENTS	DOCUMENTATION REQUIRED	SIGNATURE REQUIRED
<b>EXEMPT 0%</b>	<b>15%</b>	U.S. ARTICLE 35 - PENSIONS and IRAs under 401(a), 401(k), 457(b), 403(b), 408, 408(a)	<ol style="list-style-type: none"> <li><a href="#">COVER LETTER</a></li> <li>ORIGINAL TAX YEAR 6166</li> </ol>	<ol style="list-style-type: none"> <li>YES – PARTICIPANT</li> <li>N/A</li> </ol>

NOTE: All documents listed in **BLUE** font are generated by GlobeTax's ESP website after submission of beneficial owner data  
Participating in Relief At Source is wholly voluntary and discretionary. However, it is the only way to obtain the reduced withholding tax rate on the payable date.

## ELIGIBILITY MATRIX

### QUICK REFUND & LONG FORM\*\*\*

RATE DESCRIPTION	RECLAIM RATE	ELIGIBLE RESIDENTS	DOCUMENTATION REQUIRED	SIGNATURE REQUIRED
<b>UNFAVORABLE 15%</b>	<b>0%</b>	NON-TREATY COUNTRIES	NONE	N/A
<b>FAVORABLE 10%**</b>	<b>5%</b>	AZERBAIJAN, BAHRAIN, CHINA, CZECH REPUBLIC, GHANA, HONG KONG, INDIA, INDONESIA (PENSIONS ONLY), JAPAN, KUWAIT, OMAN, PORTUGAL, QATAR, SAUDI ARABIA, SLOVAK REPUBLIC, SOUTH AFRICA, TAIWAN, UNITED ARAB EMIRATES, UNITED KINGDOM, VENEZUELA	<ol style="list-style-type: none"> <li><a href="#">COVER LETTER</a></li> <li>CERTIFICATE OF RESIDENCY (COR)^</li> </ol>	<ol style="list-style-type: none"> <li>YES – PARTICIPANT</li> <li>N/A</li> </ol>
<b>FAVORABLE 5%**</b>	<b>10%</b>	PENSION FUNDS RESIDENT IN ETHIOPIA AND ZAMBIA	<ol style="list-style-type: none"> <li><a href="#">COVER LETTER</a></li> <li>CERTIFICATE OF RESIDENCY (COR)^</li> </ol>	<ol style="list-style-type: none"> <li>YES – PARTICIPANT</li> <li>N/A</li> </ol>
<b>EXEMPT 0%</b>	<b>15%</b>	U.S. ARTICLE 36 - CHARITIES under 501(c)(3), 509(a)(1), 509(a)(2), 509(a)(3), 17-(b)	<ol style="list-style-type: none"> <li><a href="#">COVER LETTER</a></li> </ol>	<ol style="list-style-type: none"> <li>YES – PARTICIPANT</li> </ol>
<b>EXEMPT 0%</b>	<b>15%</b>	U.S. ARTICLE 35 - PENSIONS and IRAs under 401(a), 401(k), 457(b), 403(b), 408, 408(a)	<ol style="list-style-type: none"> <li><a href="#">COVER LETTER</a></li> </ol>	<ol style="list-style-type: none"> <li>YES – PARTICIPANT</li> </ol>
<b>FOREIGN TAX EXEMPT 0%**</b>	<b>15%</b>	ANY ENTITY DOMICILED IN A COUNTRY IN WHICH IT IS NOT SUBJECT TO TAX ON PROFITS, AS LONG AS THAT STATE HAS AN EXCHANGE OF TAX INFORMATION AGREEMENT IN PLACE WITH THE NETHERLANDS, & THAT ENTITY WOULD NOT BE SUBJECT TO PROFITS TAX IN THE NETHERLANDS IF IT WERE BASED THEREIN. <i>Note: There may be an opportunity to reclaim under treaty benefits not listed above for certain Pension and Government Entities.</i> <i>Please contact <a href="mailto:DutchESP@globetax.com">DutchESP@globetax.com</a> for more information.</i>	<ol style="list-style-type: none"> <li><a href="#">COVER LETTER</a></li> <li>CERTIFICATE OF RESIDENCY (COR)^</li> <li>ARTICLES OF ASSOCIATION, TRUST DEED, ANNUAL ACCOUNT, AND/OR PENSION PLAN^</li> </ol>	<ol style="list-style-type: none"> <li>YES – PARTICIPANT</li> <li>N/A</li> <li>N/A</li> </ol>

**NOTE: All documents listed in **BLUE** font are generated by GlobeTax's ESP website after submission of beneficial owner data**

\*\* Please note this rate is not eligible for Quick Refund and can only be submitted via the Long Form process

\*\*\* Please refer to the FAQs for updated information on the Dutch RSIN process

^NOTE: These documents are to be **kept on file** in case of DTA request. They are not required to be sent to GlobeTax upon ESP submission or filing. GlobeTax will request these documents from you if they are requested by the DTA. Scans will suffice. COR is valid within 2 years from tax year.

## FREQUENTLY ASKED QUESTIONS (FAQs)

### GENERAL QUESTIONS

<b>Will I receive a declaration in lieu of Dividend Note (“DLD” or “CERT”) for my Article 35 Pensions or Article 36 Charities?</b>	<b>No</b> , all declarations in lieu of Dividend Notes are maintained by the Depository, to be released only upon written request by the Participant.
<b>Am I required to file through ESP?</b>	<b>No</b> , you may submit a traditional claim through standard mail if you cannot submit client data through ESP. We strongly suggest logging in to ESP to download the template provided when preparing your claim, regardless of your ultimate submission method.
<b>Is there any case in which a U.S. Resident 401(a), 401(k), 457(b), 403(b), IRA, Roth IRA, Employee Pension Plan or Simple Retirement Account would not qualify for Treaty Benefits under Article 35 of the Treaty between the U.S. and the Netherlands?</b>	<b>Yes</b> , for instance, these account types <b>will not</b> be considered eligible for treaty benefits under Article 35 of the treaty between the U.S. and the Netherlands for the avoidance of Double Taxation in any taxable year if <b>less than 70%</b> of the total amount of withdrawals from such U.S. Trust during that year is used to provide Pension, Retirement, or other Employee benefits as meant in Article 35.
<b>Will GlobeTax accept claims filed directly to them by Beneficial Owners?</b>	<b>No</b> , GlobeTax only accepts claims filed by the DTC participant who held the securities through DTCC and only to the extent that DTCC has reported these holdings to us as valid.
<b>Is there a possibility of an audit by the Local Tax Authority?</b>	<b>Yes</b> , the Dutch Tax Authority reserves the right to request further information and documentation regarding submitted claims.
<b>What documentation is required for Beneficial Owners who have not received a Dutch RSIN?</b>	U.S. Pension and Charities (not including IRAs) who have not received a Dutch RSIN will be required to submit an IRS Form 6166 that certifies the Beneficial Owner as an eligible U.S. tax exempt entity. The IRS Form 6166 must be valid within two years of the current date.  Non-U.S. tax exempt entities are required to submit a Certificate of Residency and other documents to prove their comparability to a Dutch tax-exempt entity such as: Articles of Association, Trust Deed, Annual Account, and/or Pension Plan. Beneficial Owners that cannot supply this documentation will not be issued a Dutch RSIN and therefore will not be eligible for a refund of Dutch withholding tax.

### AT SOURCE QUESTIONS

<b>Once I submit a Relief At Source claim, how long will it take to be paid?</b>	Relief At Source claims are paid on Pay Date through DTCC.
<b>Will I be paid through DTCC for claims submitted through the Relief At Source process?</b>	<b>Yes</b> .
<b>Do I need to physically send any documents to Computershare, Inc. in order to participate in the Relief At Source process?</b>	<b>Yes</b> , in addition to submission of the cover letter, you must provide an IRS Form 6166 for current tax year (2023).

<b>My client is unable to provide the required documentation by the Relief At Source deadline. May I still submit the claim through ESP?</b>	<b>Yes</b> , you may either participate in the Quick Refund or on-going Long Form processes, within the Statute of Limitations.
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**QUICK REFUD QUESTIONS**

<b>Will I be paid through DTCC for claims submitted through the Quick Refund process?</b>	<b>Yes.</b>
<b>Do I need to physically send any documents to GlobeTax to participate in the Quick Refund process?</b>	<p>Article 35 U.S. Pension and IRAs and Article 36 U.S Charitable entities must provide only the Beneficial Owner breakdown via ESP.</p> <p>Non-U.S. Exempt entities must provide the Beneficial Owner breakdown via ESP and Certificate of Residency, Trust Deed, Annual Account, and/or Pension Plan upon request.</p> <p>Non-U.S. entities claiming the Favorable Rate must provide the Beneficial Owner breakdown via ESP and the Certificate of Residency upon request.</p>
<b>Does the Quick Refund process have a minimum position per Beneficial Owner requirement?</b>	<b>No</b> , there is no minimum for the Quick Refund process.

**LONG FORM QUESTIONS**

<b>Will I be paid through DTCC for claims submitted through the Long Form process?</b>	<b>No</b> , you will be paid by check or ACH.
<b>Do I need to physically send any documents to GlobeTax in order to participate in the Long Form process?</b>	<p>Article 35 U.S. Pension &amp; IRAs and Article 36 U.S. Charitable entities must only provide the Beneficial Owner breakdown via ESP.</p> <p>Non-U.S. Exempt entities must provide the Beneficial Owner breakdown via ESP and Certificate of Residency, Trust Deed, Annual Account, and/or Pension Plan upon request.</p> <p>Non-U.S. entities claiming the Favorable Rate must provide the Beneficial Owner breakdown via ESP and the Certificate of Residency upon request.</p>
<b>Does the Long Form process have a minimum position requirement per Beneficial Owner? What will the fee be if a Beneficial Owner's claim is for less than \$50?</b>	<b>No</b> , there is no minimum position requirement per Beneficial Owner for Long Form. Reclaims less than \$50 are subjected to a split of the reclaim funds (50/50).

**WARNING AND DISCLAIMER:**

The information and data contained in this notice is based on information obtained from multiple sources believed to be reliable. However, Computershare and its agents do not warrant or guarantee the accuracy or completeness of, nor undertake to update or amend this information or data. We and our agents expressly disclaim any liability whatsoever for any loss howsoever arising from or in reliance upon any of this information or data. The information contained in this notice is subject to change and subject to discretion and/or pre-emption by local market rules, practices or actions taken by non-us agents or tax authorities. Deadlines often differ from statutory deadlines. You should file claims as soon as possible, and at least six months prior to the specified deadline.

In consideration of the assistance of GlobeTax and the Issuer in processing such claims, the participant expressly agrees that neither GlobeTax nor the Issuer nor any of their agents or affiliates shall have any liability for, and shall indemnify, defend and hold the Issuer and its respective agents and affiliates harmless from and against, any and all loss, liability, damage, judgment, settlement, fine, penalty, demand, claim, cost or expense (including without limitation fees and expenses of defending itself or enforcing this agreement) arising out of or in connection herewith. The participant further agrees that their obligations hereunder shall be free from all defenses.