

**ISRAEL TAX AUTHORITY**

**PROFESSIONAL DIVISION**

**Capital Market Taxation Department**

8 November 2020  
Application no.: 20201321

**Somekh Chaikin, CPAs**  
**17 Ha'arba'a St.**  
**Millennium Tower**  
**Tel Aviv 61006**

Dear Sir / Madam,

**Re: ICL Group Ltd. –Withholding Tax on Dividend Payments for Shares Traded in a  
Stock exchange Outside Israel**

(Reference: your application dated 18 October 2020)

**1. The facts as provided to us by you:**

- 1.1 ICL Group Ltd., file no. 520027830, withholding file 941084683 (hereinafter: the “**Company**”), is a company resident of Israel, incorporated in Israel in 1968 in accordance with Israeli domestic law. In 1992, as part of the Company’s privatization process, its shares were listed for trade at the Tel Aviv Stock Exchange (hereinafter: the “**TASE**”). On 24 September 2014, the Company listed its shares for trade at the New York Stock Exchange (hereinafter: the “**NYSE**”), and as of that date its shares are traded at the NYSE.
- 1.2 The Company heads a multinational group engaged in the fields of fertilizers and specialty chemicals (hereinafter: the “**Group**”). The Group is the owner of approved, beneficiary and preferred enterprises as defined in the Encouragement of Capital Investments Law, 5719-1959 (hereinafter: the “**Encouragement Law**”)
- 1.3 As of 14 October 2020, the Company’s issued and outstanding share capital includes 1,283,317,484 ordinary shares of ILS 1.00 nominal value as well as one ‘golden share’ of ILS 1.00 nominal value.
- 1.4 The Company shares are held by all shareholders (hereinafter: the “**Shareholders**”) in the following manner:
  - 1.4.1 56,874 shares held by the Shareholders (excluding those registered directly and not via a nominee company in the Company Shareholders’ registry (hereinafter: “**Name Registered Shares**”, “**Registered Shareholder**”,

respectively). Attached hereto is **Appendix A**, wherein the Registered Shareholders are detailed.

- 1.4.2 1,214,861,316 shares traded at the TASE and held via TASE members.
- 1.4.3 68,339,294 shares listed for trade on the NYSE (hereinafter: “**Shares Listed on NYSE**”) and held via American Stock Transfer & Trust Company, LLC (hereinafter: the “**Stock Registrar**”). The Shareholders holding the Shares Listed on NYSE (hereinafter: “**NYSE Shareholders**”) hold the Shares Listed on NYSE via the Stock Registrar.
- 1.5 The Company identifies material Shareholders of the Company in accordance with regulatory rules in Israel, in the United States, and in accordance with other regulatory requirements.
- 1.6 Pursuant to the Company’s distribution policy, the Company customarily distributes a dividend each quarter out of the surplus profits in the Company’s capital which constitute distributable profits as defined in Section 94B (hereinafter: the “**Distributed Dividend**”).
- 1.7 The Distributed Dividend shall be paid to the Shareholders on a payment date determined upon the date of declaration (hereinafter: the “**Payment Date**”).
- 1.8 According to the Company’s statement, a part of the Dividend is a dividend distributed out of incomes that were entitled to the tax benefits under the Encouragement Law (hereinafter: “**Limited Tax Rate Dividend**”).
- 1.9 For purposes of withholding tax and transferring it to the Israel Tax Authority, the Company has appointed I.B.I. Capital Compensation and Trusts (2004) Ltd., C.N. 513540070, a Company resident of Israel, as Tax Fiduciary (hereinafter: the “**Tax Fiduciary**”).
- 1.10 As aforesaid, the NYSE Shareholders hold their shares via the Stock Registrar. Generally speaking, the Company is unable to directly obtain the identity of the NYSE Shareholders at the time of distribution of the Dividend in order to classify them for purposes of tax withholding in accordance with the tax rate applicable thereto.
- 1.11 Upon distribution of the Dividend, the Distributed Dividend will be paid, after tax withholding, to the Stock Registrar. The Stock Registrar then transfers payment of the remaining Dividend to the brokers holding Company Shares Listed on NYSE, and from these the remaining Dividend will be transferred to the bank or broker account of the NYSE Shareholder.

## 2. **The application:**

Arrangement of tax withholding for payment of the Distributed Dividend unto the NYSE Shareholders, who hold such shares via the Stock Registrar (hereinafter: “**NYSE Dividend**”).

**3. Arrangement of tax withholding:**

Subject to the veracity of facts presented before us and detailed in Section 1 above and in your application in reference, I hereby inform you of the following:

- 3.1 The Company shall withhold tax upon the Payment Date of NYSE Dividend, via the Tax Fiduciary out of the NYSE Dividend, distributed to its Shareholders at the rate prescribed for an individual resident of Israel, pursuant to the provisions of the Income Tax Regulations (Tax Withheld on Interest, Dividend and Certain Profits), 5766-2005 (Hereinafter: “**Dividend Withholding Regulations**”), and subject to the provisions of the Income Tax Ordinance (New Version), 5721-1961 (hereinafter: the “**Ordinance**”), the Encouragement Law and the provisions of this approval (hereinafter: “**NYSE Dividend Tax Withholding**”).
- 3.2 The balance of the NYSE Dividend after the NYSE Dividend Tax Withholding shall be paid to the Stock Registrar, who shall make payment, via the brokers, to NYSE Shareholders.
- 3.3 The Company shall transfer the NYSE Dividend Tax Withholding as provided in Section 3.1, unto the Tax Fiduciary. The Tax Fiduciary shall perform the tax withholding and submit the required report respecting the Dividend distributed to the NYSE Shareholders in accordance with the provisions of this approval as specified hereunder.
- 3.4 A NYSE Shareholder who is the resident of a reciprocating country, as defined in Section 196 of the Income Tax Ordinance (hereinafter: “**Reciprocating Country Resident(s)**”), and having an equitable right to Distributed Dividend, as well as Shareholders who are foreign residents of a non-reciprocating country having an equitable right to Distributed Dividend, may submit an application to change the Dividend Withholding rate. Such application shall be submitted to the Tax Fiduciary during the period between the Payment Date and the date provided in the Dividend Withholding Regulations for transfer of the Dividend Withholding to the tax assessor (16<sup>th</sup> day of the month following the Payment Date) (hereinafter: the “**Withholding Change Period**”). The change of withholding rate shall be made according to the following rates:
  - a. Respecting a resident of a Reciprocating Country, according to the dividend tax withholding rates provided in the treaties, and/or to the tax rate applicable to a dividend subject to a limited tax rate – as the case may be.
  - b. Respecting a foreign resident of a non-Reciprocating Country, according to the tax rate applicable dividends and/or to the tax rate applicable to a dividend subject to a limited tax rate – as the case may be.
- 3.5 A company resident of Israel, entitled to a reduced tax rate, including exemption, may submit to the Tax Fiduciary an application for reduction of the withholding rate to such reduced rate during the Withholding Change Period.
- 3.6 A recipient of the NYSE Dividend (individual or body of persons) respecting which

Section 3.4 above applies, and from whose Dividend a tax rate exceeding the relevant tax rate as provided in Section 3.4 above was withheld (hereinafter: “**Excess Withholding**”), having an equitable right to the Distributed Dividend, may apply to the Tax Fiduciary and request a refund of the Excess Withholding, provided that attached to such application are all of the following documents:

- 3.6.1 A bank account statement unto which the Dividend is to be paid, current as of the Payment Date, specifying the following details: bank details, branch, account number, account holder’s name and the amount of Shares listed on the foreign stock exchange held in said account and the amount of Distributed Dividend received.
  - 3.6.2 Copy of an identification certificate as follows:
    - 3.6.2.1 Individual: passport or identity card of the foreign country.
    - 3.6.2.2 Body of persons: incorporation certificate of the foreign country.
  - 3.6.3 Certification whereby the applicant is a resident of the foreign country or Reciprocating Country for purposes of a treaty, signed by the tax authorities of the foreign country.
  - 3.6.4 A Shareholder as aforesaid shall state, on the form attached hereto in **Appendix B**, *inter alia*, as follows:
    - 3.6.4.1 That they are a foreign resident.
    - 3.6.4.2 That they have an equitable right to the Dividend and to the yields deriving from investment in the Shares.
    - 3.6.4.3 That their investment in Company Shares is not via their permanent enterprise in Israel.
    - 3.6.4.4 That they are not holding the Shares, directly or indirectly, for another person.
    - 3.6.4.5 The income is not paid unto their permanent institution outside of their country of residence.
  - 3.6.5 A company resident of a foreign country (excluding a company as provided in Section 3.6.6) shall attach its shareholders’ registry current as of the effective date, and attach a statement certifying that over 75% of its shareholders, directly or indirectly, are individuals residing in said country.
  - 3.6.6 A publicly traded company whose shares are traded at a stock exchange outside Israel, or a direct or indirect subsidiary of such a company, resident of a Reciprocating Country, shall attach a statement certifying that it is a resident of such Reciprocating Country or foreign country, as the case may be.
- 3.7 A company resident of Israel shall submit to the Tax Fiduciary an Israeli certificate

of incorporation, as well as the above detailed documents, *mutatis mutandis*.

- 3.8 The Tax Fiduciary shall take possession of the required certifications and statements detailed above and all other documents it deems necessary whereby the NYSE Shareholder is a resident of a foreign country and/or entitled to a reduced withholding tax rate. Such documents shall be retained by the Tax Fiduciary for the period which the bookkeeping documents of the Tax Fiduciary are to be retained respecting the tax year on which the Dividend was paid, and such documents shall be submitted to the tax assessor and/or withholding tax assessor upon request.
- 3.9 It is hereby clarified that the tax rates provided in the treaty or in this Tax Ruling are solely for purposes of tax withholding via the Tax Fiduciary. A person applying for withholding reduction who does not meet the terms provided in Sections 3.6 or 3.7 above shall direct their application to the Tax Fiduciary and attach documents as required, and in such a case the Tax Fiduciary shall apply to the Professional Division of the Israel Tax Authority during the Withholding Change Period for examination and further instructions.
- 3.10 In case a Shareholder presents before the Tax Fiduciary a valid certification issued by a tax assessor, the Tax Fiduciary shall act according to such certification.
- 3.11 Refund of Excess Withholding to Shareholders holding over 5% shall be in accordance with a valid certification issued by a tax assessor or to the instructions of Capital Market Taxation Department.
- 3.12 Transfer of the tax withholding funds to the Israel Tax Authority, after deduction of Excess Withholding refunded to the Shareholders as aforesaid, shall be executed by the Tax Fiduciary, who shall be the “debtor”, as defined in the Dividend Withholding Regulations, as pertains to the tax withholding amounts out of the Distributed Dividend, and shall bear, respecting such amounts, sole liability for the tax withholding and transfer thereof to the tax assessor’s office wherein the Company’s withholding file is administered (hereinafter: the “**Withholding Tax Assessor**”) at the times set in the Dividend Withholding Regulations, all subject to the provisions of this approval.
- 3.13 It is hereby clarified that tax withholding payments shall bear linkage and interest differences as of the end of the date provided in Regulation 13 of the Dividend Withholding Regulations and until actual transfer thereof to the tax assessor. Notwithstanding, the Tax Fiduciary may deliver an detailed calculation report as provided in Regulation 14(a), within 30 days of the date provided in the Regulation, and until such date no fines shall be imposed for failure to report on time.
- 3.14 The Tax Fiduciary shall return the Excess Withholding to the bank account of the Withholding reduction applicant, unto which the Dividend was paid as provided in Section 3.6.1 above out of the Dividend Withholding amount within 30 days after date of payment to the tax assessor.
- 3.15 It would be emphasized that, subject to transfer of the Tax Withholding amount by the Company unto the Tax Fiduciary, the Tax Fiduciary shall full liability for execution of the tax withholding, in accordance with this approval, and for transfer thereof to the Withholding Tax Assessor, all subject and pursuant to the provisions

of this approval.

- 3.16 The Company shall publish, via the NYSE public notices system, the essence of the forms attached hereto as **Appendix B** and a summary of instruction for completion of said forms.

#### General instructions

- 3.17 This tax arrangement is solely for purposes of determining the manner of tax withholding out of the distribution of said Dividend to the Company Shareholders. It would be emphasized that this taxation ruling does not constitute a tax assessment and/or approval of the facts as presented by you. The facts shall be examined by the tax assessor in the course of assessment deliberations, including the Company's file and/or the files of the Shareholders, as the case may be.
- 3.18 It is hereby emphasized that the classification of the income out of which the Dividend is distributed, including its classification as a limited tax rate dividend is the responsibility of the Company alone. In general and to the extent it is determined, at the tax assessment stage, that the income classification is different and the tax withholding rates are higher, the Company hereby undertakes to complement the additional tax not withheld in accordance with the new classification determined in the tax assessment.
- 3.19 In general, this taxation ruling does not determine the classification of the tax event and/or the classification of the income and/or the amount of the income and the nature thereof in the hands of all Dividend receiving Shareholders.
- 3.20 It would be emphasized that the tax arrangement detailed above is solely for purposes of tax withholding and does not exhaust the final tax liability of the Shareholders. Nothing in this taxation ruling shall derogate from the right of a Shareholder, considering themselves entitled to a tax rebate as aforesaid, to apply directly to the tax assessor, in order to receive the tax amount withheld and transferred to the Withholding Tax Assessor. It would be clarified that the foregoing shall only be achieved by submitting a report, as defined in Section 131 of the Ordinance, to the tax assessor. It is hereby clarified that nothing in the foregoing shall derogate from the powers granted to the tax assessor according to the Ordinance.
- 3.21 It is hereby emphasized that nothing in this taxation ruling shall act to determine the manner of treatment, for tax purposes, of Company books. Nothing in this taxation ruling constitutes a tax assessment respecting the Company, and nothing in this taxation ruling shall restrict the tax assessor in making a tax assessment, except as pertains to tax withholding issues arranged in this taxation ruling and subject thereto.
- 3.22 This taxation ruling is issued subject to the veracity of the facts provided to us by you and subject to your providing all complete and relevant details, including those noted in this taxation ruling. The Israel Tax Authority may revoke this taxation ruling, in whole or in part, forthwith or retroactively, in case it is discovered that the

details provided are incorrect and/or in case it is discovered that material details have been omitted altogether.

- 3.23 **This taxation ruling shall apply to Dividend distributions paid until 31 December 2025.**
- 3.24 The Company and the Tax Fiduciary hereby undertake to deliver unto the Professional Division of the Israel Tax Authority and unto the tax assessor, within 30 days of issuance of this taxation ruling, a letter wherein they approve acceptance of all terms of this approval, *verbatim* and without reservation. In case such a letter is not received from the Company and the Fiduciary within the aforementioned period, this taxation ruling shall be deemed retroactively void.

Asi Mazouz, CPA  
*[Signed]*  
Manager, National Companies Supervisor

**Copies:**

Mr. Roland Am-Shalem, CPA (LL.B.) – Senior Deputy DG, Professional Affairs  
Mr. Nadav Nagar, CPA – Director of the Professional Division  
Mr. Aharon Eliyahu, CPA – Jerusalem Tax Assessor 1 (C.N. 520027830)  
Ms. Na'ama Shuan, CPA (Adv.) – Director, Capital Market Department  
Ms. Revital Raz, CPA – Deputy Director, Capital Market Department  
Mr. Shaul Cohen, Adv. – Legal Counsel, Capital Market Department  
Mr. Raffi Twina, Adv. – Legal Counsel, Capital Market Department

# Appendix A



1/10/20

As of October 14, 2020

## A. Shareholders Registry

Name of registered shareholder	Identification number type	I.D. number	Nationality / country of incorporation or registration	Country of nationality / incorporation or registration	Address	Share class	Share quantity	Holding shares as trustee
<u>I.D.E. Technologies Ltd.</u>	Israel Companies Registrar Number	51-0453582	Incorporated in Israel		Industrial Park, Hamatechet St., Kadima 60920 (P.O.B. 5016)	Ordinary	205.00	No
<u>Aharon David</u>	ID card number	011765848	Private person, Israeli national		124 Hanassi Blvd., Haifa 34633	Ordinary	1,000.00	No
<u>Aharon Sandra</u>	ID card number	011765880	Private person, Israeli national		124 Hanassi Blvd., Haifa 34633	Ordinary	1,000.00	No
<u>Bar Lev Yehuda</u>	ID card number	64837123	Private person, Israeli national		6 Yehuda Leib Tverski St., Tel Aviv 69080	Ordinary	10.00	No
<u>Bar Shani Alon</u>	ID card number	54906409	Private person, Israeli national		369 Maccabim-Reut	Ordinary	1.00	No
<u>Baraz Raoul</u>	ID card number	16754616	Private person, Israeli national		7 Rudolph Bloch St., Be'er Sheva	Ordinary	1.00	No
<u>Breuer Aliza</u>	ID card number	5419781	Private person, Israeli national		Erkin Eliezer 20, P.O. 490, Mazkeret Batia	Ordinary	1,900.00	No
<u>Gullis Avraham</u>	ID card number	1760114	Private person, Israeli national		3/7 Giborei Israel St., Kfar Sava 44227	Ordinary	100.00	No
<u>Omer Mordechai Globus</u>	ID card number	023734007	Private person, Israeli national		4 Sasha Argov St., Tel Aviv 69620	Ordinary	667	No
<u>Uri Globus</u>	ID card number	029623386	Private person, Israeli national		328 Dizengoff St., Apt. 8, Tel Aviv 6311827	Ordinary	667	No
<u>David Friedman</u>	ID card number		Private person, Israeli national		Ramat Gan	Ordinary	16.00	No
<u>Israel Corporation Ltd.</u>	Israel Companies Registrar Number	520028010	Incorporated in Israel		Millennium Tower, 23 Aranha St., Tel Aviv	Ordinary	1	No
<u>Hapoalim Bank Nominee Company Ltd.</u>	Israel Companies Registrar Number	510356603	Incorporated in Israel		62 Yehuda Halevi St., Tel Aviv	Ordinary	1,214,861,316	No
<u>American Stock Transfer &amp; Trust Company, LLC</u>			Incorporated in the United States		6201 15 <sup>th</sup> Avenue, Brooklyn, New York 11219	Ordinary	68,399,294	No
<u>Holding Company of Export Enterprises Ltd.</u>	Israel Companies Registrar Number	510242142			Holding Company of Export Enterprises Ltd. c/o Ministry of Trade and Commerce, 30 Agron St., Jerusalem	Ordinary	205.00	No
<u>Tal Erez</u>	ID card number	32227241	Private person, Israeli national		12 Tagore St., Ramat Aviv, Tel Aviv 96302	Ordinary	1.00	No

ICL  
Millennium Tower, Aranha St. 23  
P.O.B 20245 Tel Aviv 6120201  
Tel. 972 3 6844400 Fax. 972 3 6844444  
[www.icl-group.com](http://www.icl-group.com)

א.י.סי.אל  
מגדל המילניום רח' ארניא 23  
ת.ד. 20245 תל-אביב 6120201  
טל: 972-3-6844400 פקס: 972-3-6844444  
[www.icl-group.com](http://www.icl-group.com)





Name of registered shareholder	Identification number type	I.D. number	Nationality / country of incorporation or registration	Country of nationality / incorporation or registration	Address	Share class	Share quantity	Holding shares as trustee
<u>Kahana Hagai</u>	ID card number	43021823	Private person, Israeli national		61 Hoffine St., Ramat Aviv, Tel Aviv	Ordinary	200.00	No
<u>ICL Group Ltd.</u>	Registration number	520027830	Israel		23 Aranha st. Tel-Aviv 61070 Israel	Ordinary Treasury Shares	21,823,500	No
<u>State of Israel – Ministry of Finance – General Accountant Division</u>						Ordinary	205.00	No
<u>State of Israel (Bank of Israel)</u>						Special	1.00	No
<u>Monic Davidian</u>	ID card number	68711555	Private person, Israeli national	6/11 Tahkemoni St., Ramat Hasharon 47821		Ordinary	1,194.00	No
<u>Negev Industrial Minerals Ltd.</u>	Israel Companies Registrar Number	52-0019645	Incorporated in Israel	POB 1584, Omer 84965		Ordinary	205.00	No
<u>Neumann David</u>	ID card number	8332884	Private person, Israeli national	9 Moshe Koi St., Jerusalem 9371515		Ordinary	100.00	No
<u>Nomberg Tom</u>	ID card number	216785048	Private person, Israeli national	4/22 Zvi Ganot St., Rishon Lezion		Ordinary	290.00	No
<u>Sorrell Roger</u>	ID card number	307232645	Private person, Israeli national	HaRav Kosovsky Street 48/1 Tel Aviv. 6291069		Ordinary	200.00	No
<u>Ezer Ezra</u>	ID card number	045718335	Private person, Israeli national	No. 3 Gan Hadarom Moshav, TPO Avtach		Ordinary	35,000.00	No
<u>Panzer Nathan</u>	ID card number	008037392	Private person, Israeli national	POB 4241, Haifa 31042		Ordinary	700.00	No
<u>Citron Yohanan</u>	ID card number	15482201	Private person, Israeli national	39 Arthur Ruppin St., Be'er Sheva 84780		Ordinary	1.00	No
<u>Kramer Moshe</u>	ID card number	59761759	Private person, Israeli national	5 Damesek Eliezer, Bnei Brak, POB 432		Ordinary	1.00	No
<u>Rotem Amfert Negev Ltd.</u>	Israel Companies Registrar Number	52-0030883	Incorporated in Israel	Mishor Rotem Industries, Arava 86800		Ordinary	205.00	No
<u>Raz Livant</u>	ID card number	55088645	Private person, Israeli national	8 Hacamel, New Givat Savion 55900		Ordinary	1.00	No
<u>Shenhav Naomi</u>	ID card number	67874008	Private person, Israeli national	111 Yehuda Hanassi St., Herzliya 46448		Ordinary	4,000.00	No

ICL  
Millennium Tower, Aranha St. 23  
P.O.B 20245 Tel Aviv 6120201  
Tel. 972 3 6844400 Fax. 972 3 6844444  
www.icl-group.com

א.י.סי.א.ל.  
מגדל המילניום רח' ארניא 23  
ת.ד. 20245 תל-אביב 6120201  
טל: 972-3-6844400 פקס: 972-3-6844444  
www.icl-group.com



Name of registered shareholder	Identification number type	I.D. number	Nationality / country of incorporation or registration	Country of nationality / incorporation or registration	Address	Share class	Share quantity	Holding shares as trustee
<u>Schatzki Ruth</u>	ID card number	009073123	Private person, Israeli national	4 Jehoshaphat St., Be'er Sheva		Ordinary	8,592.00	No

## B. Option-Holders Registry

### Options 2014

IBI Capital	2810307	Ehad Haam 9, Tel Aviv 61291	1,003,132	
-------------	---------	-----------------------------	-----------	--

### Options 2015

IBI Capital	2810307	Ehad Haam 9, Tel Aviv 61291	0	
-------------	---------	-----------------------------	---	--

### Options 2016

IBI Capital	2810307	Ehad Haam 9, Tel Aviv 61291	1,741,245	Update due to cancelations
-------------	---------	-----------------------------	-----------	----------------------------

### Options 2017

IBI Capital	2810307	Ehad Haam 9, Tel Aviv 61291	5,076,347	Update due to cancelations
-------------	---------	-----------------------------	-----------	----------------------------

### Options 2018

IBI Capital	2810307	Ehad Haam 9, Tel Aviv 61291	5,095,409	Update due to cancelations
-------------	---------	-----------------------------	-----------	----------------------------

### Options 2019

IBI Capital	2810307	Ehad Haam 9, Tel Aviv 61291	16,368,194	
-------------	---------	-----------------------------	------------	--

# Appendix B



החטיבה המקצועית  
מחלקת מיסוי שוק ההון

## נספח ב'

### **Israel Chemicals Ltd dividends distribution CLAIM FOR REDUCED RATE OF WITHHOLDING TAX IN ISRAEL ON DIVIDEND PAYMENTS TO A NON ISRAELI TAX RESIDENT**

You are receiving this form "Declaration of Status For Israeli Income Tax Purposes" as a holder of shares of common stock, par value (XXX) per share (the "Shares" ) of Israel Chemicals Ltd ("ICL"), in connection with the payment of dividends to the shareholders of ICL in (XX.XX.XXXX)

By completing this form in a manner that would substantiate your eligibility for a reduced rate of Israeli withholding tax with respect to this dividend distribution, you will allow ICL and its Israeli tax agent, to withhold tax in Israel from the dividend distribution made to you at a reduced tax rate.

This form shall be completed and signed by the recipient of the dividend or by an authorized officer or representative of the recipient.

This claim is made pursuant to the Double Tax Convention between Israel and the country of residence of the recipient of the dividend.

#### **PART A: RECIPIENT DECLARATION**

##### **RECIPIENT INFORMATION**

Full name of the recipient:	<b>For Individuals:</b> Identity Number, Social Security No., or Passport No./ <b>For Legal Entities:</b> Registration No. /Corporation No.	Type of Investor: Legal Entity <input type="checkbox"/> Individual <input type="checkbox"/> Trust Beneficiary <input type="checkbox"/>
<b>With respect to an individual</b>		<b>With respect to a legal entity</b>
Date of birth:		The country in which it was incorporated:  The country in which control and management are conducted:
Country of residence:		
Country of citizenship:		
Country issuing passport:		
Income Tax File number of recipient in place of residence: _____		
Address of local income tax assessing office in recipient's place of residence: _____		



החטיבה המקצועית  
מחלקת מיסוי שוק ההון

The recipient is a fiscal resident of (insert country) _____ since (insert date)._____ .	
Permanent Address (country, city, street, house or apartment number):	
Mailing Address:	Investor's Telephone number:
	Telephone number of authorized signatory:

**With regard to an Individual:**

**I declare that I am not an Israeli resident because (please mark all applicable boxes):**

<input type="checkbox"/>	1.	The State of Israel is not my permanent place of residence.
<input type="checkbox"/>	2.	The State of Israel is neither my place of residence nor my family's place of residence.
<input type="checkbox"/>	3.	My ordinary or permanent place of activity is not within the State of Israel, and I do not have a permanent establishment in the State of Israel.
<input type="checkbox"/>	4.	I do not engage in any occupation within the State of Israel.
<input type="checkbox"/>	5.	I do not own a business or part of a business within the State of Israel.
<input type="checkbox"/>	6.	This year, I did not stay and I do not intend to stay in Israel for 183 days or more.
<input type="checkbox"/>	7.	This year, I did not stay in Israel and I also do not intend to stay in Israel for 30 days or more and my total stay in Israel this year and in the two preceding years will not reach 425 days.
<input type="checkbox"/>	8.	I am not insured with the National Insurance Institute in the State of Israel.
<input type="checkbox"/>	9.	I am the sole beneficial owner of the dividend income.

**With regard to a Legal Entity:**

**I declare that the Legal Entity is a non - Israeli resident because (please mark all applicable boxes):**

<input type="checkbox"/>	1.	Over 75% of the shareholders are individuals with the same residency as the Legal Entity (attached declaration of shareholders)
<input type="checkbox"/>	2.	It is not registered /incorporated with the Registrar of Companies in Israel.
<input type="checkbox"/>	3.	It is not registered with the Registrar of non profit organizations in Israel. (Amutot)



החטיבה המקצועית  
מחלקת מיסוי שוק ההון

<input type="checkbox"/>	4.	The control of the legal entity is not in Israel.
<input type="checkbox"/>	5.	The management of the legal entity is not in Israel.
<input type="checkbox"/>	6.	The legal entity does not have a permanent enterprise in Israel and the entity does not have a permanent establishment in the State of Israel
<input type="checkbox"/>	7.	No Israeli resident holds, directly or indirectly via shares or through a trust or in any other manner, alone or with another who is an Israeli resident, one or more of the means of control of the legal entity, as specified below, at a rate exceeding 25%. The term "means of control" refers to the following: (a) the right to participate in profits; (b) the right to appoint a director; (c) the right to vote; (d) the right to share in the assets of the entity at the time of its liquidation; (e) the right to direct the manner of exercising one of the rights specified above.
<input type="checkbox"/>	8.	The legal entity is the sole beneficial owner of the dividend income.

**DETAILS OF INCOME RECEIVED**

Place of receipt (country, city, bank account number, Amount)

Country	City	Bank name and account number	Amount

The recipient declares that all the information provided above is accurate and complete.

\_\_\_\_\_  
Date of Signature

\_\_\_\_\_  
Signature of Recipient

**PART B: CERTIFICATION OF FOREIGN INCOME TAX AUTHORITY**

This part shall be completed and signed by the income tax authorities of the recipient's place of residence

1. I certify that:

a. the recipient of the income is a fiscal resident of (insert country) \_\_\_\_\_;



החטיבה המקצועית  
מחלקת מיסוי שוק ההון

- b. the recipient regularly reports his income as required, the most recent income tax return filed being for the year \_\_\_\_\_;
- c. the income concerned  is/  is not subject to tax in (insert the recipient's country of residence) \_\_\_\_\_.

\_\_\_\_\_  
Date of  
Signature

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Official Stamp

2. Address of certifying official: \_\_\_\_\_
3. Position or Title of certifying official: \_\_\_\_\_
4. Name of Income Tax Authority official making this certification: \_\_\_\_\_

**PART C: DOCUMENTATION**

**With regard to an Individual** - List all documents attached –:

1. Copy of passport or identity card issued by the country of tax residency of shareholder
2. Bank statement from the date of entitlement to the dividend including bank account details of the account holder, bank name and account number and the number of listed shares held by the shareholder.
3. Bank statement from the date of payment of the dividend, including bank account details of the account holder, bank account number and the amount of the dividend received.

**With regard to a Legal Entity** - List all documents attached:

1. Copy of Certificate of Incorporation issued by the country of tax residency of shareholder
2. List of shareholders of the Legal Entity and declarations regarding their state of residency for tax purposes.
3. Bank statement from the date of entitlement to the dividend including bank account details of the account holder, bank name and account number and the number of listed shares held by the shareholder.
4. Bank statement from the date of payment of the dividend, including bank account details of the account holder, bank account number and the amount of the dividend received.