



Comunicado N° 9847

Ref.: Solicitud de Devolución de Impuestos retenidos sobre pago del Rescate de US TREASURY BILL ZCP VTO. 21/11/2019

Código CVSA: 80484

Código ISIN: US912796ST76

Buenos Aires, 08 de noviembre de 2019

Sres. Depositantes

Tengo el agrado de dirigirme a ustedes, a efectos de hacerles llegar la información recibida de la Central Depositaria Internacional Euroclear Bank, acerca de la Devolución de la Retención de Impuestos a practicarse sobre el pago del Rescate de los títulos de la referencia a llevarse a cabo el 21/11/2019.

Según lo informado en nuestro Comunicado Nro. 9575 emitido el día 10/04/2019, aquellos tenedores que deseen tomar acción al respecto, deberán presentar en el Sector Documental Imputaciones (25 de mayo 359, 8vo piso) de Caja de Valores S.A., el formulario "Solicitud para participar de Eventos Corporativos" (en Original y Duplicado) disponible en la página web de Caja de Valores S.A. (www.cajadevalores.com.ar) y un **Formulario W8** por cada Beneficiario Final, no más del 15/11/2019, hasta las 13:30 hs, con el fin de que se proceda a enviar a dicha Central los formularios correspondientes.

Por favor tengan en cuenta que solo podrán participar aquellos tenedores que tengan posición al momento de la presentación de la solicitud, **la que tendrá el carácter de irrevocable**, por lo cual los títulos serán bloqueados hasta la fecha registro.

Asimismo recordamos que, para aquellas posiciones que se encuentren en cuentas de garantía y por las cuales deseen participar del presente evento, también deberán presentar los formularios anteriormente mencionados.

Para mayor información adjuntamos el reporte recibido de Euroclear Bank (Anexo I).

Señalamos que es de exclusiva responsabilidad de los Depositantes y de los tenedores de los títulos tomar o no acción al respecto; razón por la cual las condiciones del presente no podrán interpretarse como recomendaciones o sugerencias de Caja de Valores S.A. para participar en el evento.

Caja de Valores S.A.

25 de Mayo 362, (C1002ABH) Bs. As. Argentina

Tel./Fax: (54 11) 4317 8900

www.cajval.sba.com.ar

Agente de Depósito Colectivo - Agente de Custodia, Registro y Pago, registrado bajo el N°19 de la CNV



**CAJA DE
VALORES**

F-90822.06

Por cualquier duda o consulta podrán comunicarse con el Area Internacional al 4317-8900 Int. 8602.

Sin otro particular los saluda atentamente,

Walter Escudero

Gerente de Operaciones

JCM

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CORPORATE ACTIONS

Corporate action details for CA00000006207484 - Withholding Tax Relief Certification
Service provider EB - Place of holding EB

General information

Corporate action indicator:	Withholding Tax Relief Certification
Corporate action reference:	CA00000006207484
Mandatory/voluntary indicator:	Voluntary CA event
Corporate action processing:	General
Related corporate action:	CA00000006174962

Main underlying security

ISIN:	US912796ST76
Common code:	200351053
Description:	GOVERNMENT OF THE U ZCP 21/11/19

Financial instrument attributes

Type of financial instrument:	BILL
Denomination currency:	USD
Maturity date:	21 Nov 2019

Corporate action details

Certification deadline:	20 Nov 2019
Deadline for tax breakdown instructions:	20 Nov 2019 - 06:00

Action to take

200351053/US912796ST76 GOVERNMENT OF THE U ZCP 21/11/19 IS SUBJECT TO THE HOLDING REGULATIONS OF US INTERNAL REVENUE CODE SECTION 1441.

TO OBTAIN RELIEF AT SOURCE THROUGH EUROCLEAR BANK, PARTICIPANTS MUST MEET THE REQUIREMENTS OUTLINED BELOW.

1. SEGREGATION REQUIREMENTS :

DEPENDING ON THEIR STATUS, NON-US PARTICIPANTS MAY NEED TO KEEP US SECURITIES IN SEGREGATED ACCOUNTS
- TO COMPLY WITH THE SEGREGATION REQUIREMENTS, PARTICIPANTS MAY NEED TO OPEN NEW ACCOUNTS. THE DEADLINE FOR RECEIVING ACCOUNT OPENING REQUESTS IS TWO WEEKS BEFORE THE RECORD DATE OF THE RELEVANT PAYMENT.

2. DOCUMENTATION:

- AT THE LEVEL OF THEIR ACCOUNTS, AND IN SOME CASES AT THE LEVEL OF UNDERLYING ACCOUNT HOLDERS, ALL PARTICIPANTS MUST PROVIDE DULY COMPLETED EUROCLEAR BANK WITHHOLDING STATEMENTS AND IRS FORMS TO EUROCLEAR BANK

- DOCUMENTATION MUST ARRIVE AT EUROCLEAR BANK NO LATER THAN TWO BUSINESS DAYS BEFORE THE PAYMENT DATE

- IRS FORMS W-8BEN, W8-EXP AND W8-IMY CAN BE OBTAINED FROM WWW.IRS.GOV OR ON OUR WEBSITE (MY.EUROCLEAR.COM)

EUROCLEAR BANK WITHHOLDING STATEMENTS ARE TO BE CHOSEN ACCORDING TO THE WAY PARTICIPANTS ACT ON THE US MARKET:

- A. BENEFICIAL OWNER ACCOUNT
- B. QUALIFIED INTERMEDIARY ON BEHALF OF ACCOUNT HOLDERS OTHER THAN US NON-EXEMPT RECIPIENTS
- C. QUALIFIED INTERMEDIARY ON BEHALF OF US NON-EXEMPT RECIPIENTS
- D. QUALIFIED INTERMEDIARY WITH PRIMARY NON-RESIDENT ALIEN (NRA) AND BACKUP WITHHOLDING RESPONSIBILITY/ FOREIGN WITHHOLDING RESPONSIBILITY/ FOREIGN WITHHOLDING PARTNERSHIP/ US BRANCH
- E. NON-QUALIFIED INTERMEDIARY/ SEGREGATED ACCOUNT
- F. NON-QUALIFIED INTERMEDIARY OMNIBUS ACCOUNT

EUROCLEAR BANK WITHHOLDING STATEMENTS CAN BE OBTAINED FROM OUR WEBSITE (MY.EUROCLEAR.COM)

3. ALLOCATION INFORMATION REQUIREMENTS :

- PARTICIPANTS THAT ACT AS A QUALIFIED INTERMEDIARY (QI) WITHOUT NON-RESIDENT ALIEN (NRA) RESPONSIBILITY AND HOLD ALL POSITIONS FOR NON-US RESIDENTS IN AN OMNIBUS ACCOUNT MUST PROVIDE LOCATION INFORMATION TO EUROCLEAR BANK BY 6:00 BRUSSELS TIME ONE BUSINESS DAY BEFORE THE PAYMENT DATE,
- PARTICIPANTS THAT ACT AS A QI WITHOUT NRA WITHHOLDING RESPONSIBILITY AND HOLD POSITIONS FOR NON-US RESIDENTS IN ACCOUNTS PER TAX POOL MUST TRANSFER SUCH HOLDINGS TO THE CORRECT TAX POOL ACCOUNT BY THE RECORD DATE,
- PARTICIPANTS THAT ACT AS A QI WITHOUT 1099/BACK-UP WITHHOLDING RESPONSIBILITY MUST PROVIDE ALLOCATION INFORMATION AT THE LEVEL OF ALL DOCUMENTED US NON-EXEMPT RECIPIENTS BY 10:00 BRU LS TIME 15 DAYS AFTER THE RELEVANT PAYMENT DATE.

ALLOCATION INFORMATION CAN BE SENT USING MT 565 OR SWIFT FREE FORMAT. ALL INFORMATION MUST BE ADDRESSED TO EUROCLEAR BANK US TAX OPERATIONS

PARTICIPANTS THAT FAIL TO MEET THE ABOVE DEADLINES MAY BE UNABLE TO BENEFIT FROM RELIEF FROM WITHHOLDING TAX. IN SUCH CASE, EUROCLEAR BANK WILL NOT PERFORM ANY ADJUSTMENTS OR REFUNDS IF TOO MUCH TAX IS WITHHELD.

IMPORTANT REMARK:

PARTICIPANTS CLAIMING A REDUCED RATE OF WITHHOLDING TAX ON US SOURCE INCOME UNDER A DTA MUST MEET ALL PROVISIONS OF THE APPLICABLE DTA, INCLUDING ANY LIMITATION ON BENEFITS (LOB) PROVISIONS. THE LOB PROVISIONS CONTAINED IN THE US DTAs CAN BE FOUND ON THE US WITHHOLDING TAX REFORM SECTION OF OUR WEBSITE (MY.EUROCLEAR.COM)

Corporate action narrative

Party contact description:

TAX ADMINISTRATION TAX CS EXT.1011

General information:

200351053/US912796ST76 GOVERNMENT OF THE U ZCP 21/11/19 IS SUBJECT TO THE HOLDING REGULATIONS OF US INTERNAL REVENUE CODE SECTION 1441.

FOR ORIGINAL ISSUE DISCOUNT (OID) PAID UPON REDEMPTION ON THIS SECURITY, THE REPORTING INFORMATION IS AS FOLLOWS:

- INCOME TYPE: ORIGINAL ISSUE DISCOUNT
- GENERAL INCOME CODE: 31

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THE MAXIMUM WITHHOLDING TAX RATE IS 24 PERCENT.

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THESE PAYMENTS ARE NOT SUBJECT TO NON-RESIDENT ALIEN (NRA) WITHHOLDING TAX OR 1042-S REPORTING, BUT ONLY TO BACKUP WITHHOLDING TAX AND 1099 REPORTING, AS APPLICABLE.

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ELIGIBILITY REQUIREMENTS

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TO OBTAIN RELIEF AT SOURCE, PARTICIPANTS MUST COMPLY WITH STRINGENT ACCOUNT STRUCTURE AND DOCUMENTATION REQUIREMENTS. DEPENDING ON THE STATUS OF YOUR ACCOUNT, YOU MAY NEED TO:

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- OPEN NEW ACCOUNTS IN ORDER TO COMPLY WITH THE SEGREGATION REQUIREMENTS,

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- PRIOR TO THE RECORD DATE FOR THE RELEVANT PAYMENT, TRANSFER POSITIONS TO THE PROPER ACCOUNTS, AS REQUIRED,

.
- SEND THE NECESSARY WITHHOLDING STATEMENTS AND IRS FORMS TO EUROCLEAR BANK, AND

.
- SEND ALLOCATION INFORMATION FOR THE RECORD DATE POSITIONS.

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FOR MORE INFORMATION, PLEASE CONSULT THE US TAX SECTION OF OUR WEBSITE (MY.EUROCLEAR.COM)