



**CAJA DE
VALORES**

Comunicado N° 11526

**Ref.: Solicitud de Devolución de Impuestos retenidos sobre pago de Renta de
ON QUALCOMM INC. 2.9% V.20/05/24 U\$S CG**

Código CVSA: 82698

Código ISIN: US747525AT09

Buenos Aires, 10 de Mayo de 2023

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 de Renta de los títulos de la referencia a llevarse a cabo el 22/05/2023.

Aquellos depositantes que deseen tomar acción al respecto, deberán hacerlo ingresando y autorizando sus instrucciones a través del sistema GIC (Gestión Integral de Custodia – GEDOP Externos) disponible en la siguiente dirección: <https://gic.sba.com.ar> (Menú Eventos Corporativos Internacionales), incluyendo un **Formulario W8** por cada Beneficiario Final, no más del 18 de Mayo de 2023, hasta las 18:00 horas, con el fin de que se proceda a enviar a dicha Central las instrucciones correspondientes.

Asimismo, recordamos que para aquellas posiciones que se encuentren en cuentas de garantía, y por las cuales se desee solicitar excepciones, se deberán ingresar y autorizar las instrucciones de la misma manera anteriormente indicada.

Adicionalmente, los títulos deberán permanecer en esta cuenta hasta la liquidación del evento.

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



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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.

Recordamos que el costo del trámite realizado ante Euroclear por cada W8 presentado es de Euros 200,00.

Por cualquier duda o consulta podrán comunicarse con el Area de Eventos Corporativos al 4317-8955.

Sin otro particular los saluda atentamente,

Alejandro Berney

Director Ejecutivo

JCM



EasyWay™
CORPORATE ACTIONS

Corporate action details for CA00000008089304 - Withholding Tax Relief Certification
Service provider EB - Place of holding EB

General information

Corporate action indicator:	Withholding Tax Relief Certification
Corporate action reference:	CA00000008089304
Mandatory/voluntary indicator:	Voluntary CA event
Corporate action processing:	General
Related corporate action:	CA00000008066460

Main underlying security

ISIN:	US747525AT09
Common code:	162238132
Description:	QUALCOMM INCORPO/SECREG 2.9 20/05/24

Financial instrument attributes

Type of financial instrument:	NOTE
Denomination currency:	USD
Maturity date:	20 May 2024

Corporate action details

Certification deadline:	19 May 2023
Deadline for tax breakdown instructions:	19 May 2023 - 06:00

Action to take

162238132/US747525AT09 QUALCOMM INCORPO/SECREG 2.9 20/05/24 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.

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2. DOCUMENTATION:

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- 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

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

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

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

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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

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

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3. ALLOCATION INFORMATION REQUIREMENTS :

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- 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.

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

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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.

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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:

162238132/US747525AT09 QUALCOMM INCORPO/SECREG 2.9 20/05/24 IS SUBJECT TO THE HOLDING REGULATIONS OF US INTERNAL REVENUE CODE SECTION 1441.

FOR COUPON PAYMENTS ON THIS SECURITY, THE REPORTING INFORMATION FOR IRS FORM 1042-S IS AS FOLLOWS:

- INCOME TYPE: INTEREST PAID BY US OBLIGORS
- GENERAL INCOME CODE: 01

THE MAXIMUM WITHHOLDING TAX RATE IS 30 PERCENT.
ELIGIBILITY REQUIREMENTS

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:

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

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

Issuer:

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