

acupay Updates

Friday, 2 May 2014



Italy Tax Update: Italian Substitute Tax Rate to Increase

On 24 April 2014, the Italian government issued Law Decree No. 66 aimed at increasing competitiveness and social justice in Italy. It also confirms some of the tax measures announced earlier this year by the Italian Prime Minister ([see Acupay Updates of 8 April 2014](#)), which make significant changes to Italian tax on financial income.

Substitute Tax Rate to Increase from 20% to 26%

The Decree stipulates an increase from 20% to 26% in the substitute tax rate ("imposta sostitutiva") provided for by Legislative Decree 239/1996. The new rate will be applicable to any interest and other proceeds (including OID) from bonds ("obbligazioni") or debentures similar to bonds ("titoli similari alle obbligazioni") **earned after 1 July 2014**.

All of the debt securities for which Acupay acts as the Tax Compliance Agent are affected by this measure (please refer to the bottom of this email for a list of ISINs).

The same rate increase also applies to dividends and certain capital gains as well as proceeds distributed by Italian open ended or closed-ended investment funds. However, interest and capital gains from Italian government bonds remain taxable at a reduced 12.5% rate.

Please note that the Decree must be converted into Law within 60 days and the measure will not take effect otherwise.

If you would like to receive updates on this matter by email, [please contact us](#).



Telefonica, S.A. ADR (ISIN: US8793822086) – Tax Relief on Upcoming Dividend Payment

Telefonica has announced a dividend payment of EUR 0.40 per ordinary share or approx. US \$ 0.554 per ADR (1 ADR: 1 ORD) to be paid to shareholders holding a position on the Record Date (Tuesday, 6 May 2014).

The dividend will be subject to 21% Spanish withholding tax. A reduced rate of Spanish withholding tax will be available when submitting a valid tax relief request in to the Acupay System. Acupay will offer a relief at source, a quick refund, and a standard refund service.

Be aware that you will need to provide a Spain-specific certificate of tax residence valid for the Record Date for each beneficial owner. If you haven't got a certificate of residence on file yet, apply immediately! For U.S. tax residents, Acupay can help you obtain an IRS Form 6166 at www.us6166.com.

Also, don't forget to file for any excess withholding tax from past dividend payments.

For more information:

- To receive a copy of the DTC Important Notice as soon as it is available, please contact the [Ateam](#).

-
- Regarding any excess withholding tax from past Telefonica ADR dividend payments, please contact our [Reclaim team](#).



Delhaize Group NV/SA (ISIN: US29759W1018) – Recovery of Belgian Withholding Tax

The Belgian supermarket chain Delhaize will hold its ordinary shareholders' meeting on Thursday, 22 May 2014. Shareholders will be asked to approve the distribution of a gross dividend of approximately EUR 1.56 per ordinary share around Monday, 2 June 2014.

Acupay continues to assist Delhaize ADR holders

To assist ADR shareholders, Delhaize Group, and its U.S. Depository Bank, Citibank, N.A., have arranged for Acupay to make available tax relief procedures to obtain a reduced rate of Belgian withholding tax on dividend payments. Acupay will distribute a DTC Important Notice once the ordinary dividend payment has been confirmed. To receive a copy of the DTC Important Notice as soon as it is available, please contact the [Ateam](#).

Acupay can also assist you with recovering excess withholding tax on any ordinary Belgian share. For more information regarding any past Delhaize ADR dividend payments or reclaiming excess tax on other Belgian dividend or interest payments, please contact our [Reclaim team](#).

*Nothing in this document is intended to constitute financial, legal or tax advice.
Copyright © 2014 Acupay System LLC, all rights reserved.*

28 Throgmorton Street, London EC2N 2AN, United Kingdom • Phone: +44 (0) 20 7382 0340
30 Broad Street, New York NY 10004, USA • Phone: +1 212 422 1222
www.acupay.com | ateam@acupay.com

[unsubscribe](#)

List of Italian securities for which Acupay acts as the Tax Compliance Agent and which are affected by Law Decree No. 66:

US 26874RAA68	US 46115HAA59	US 46115HAG20	US 46115HAM97
US 26874RAB42	US 46115HAB33	US 46115HAH03	US 46115HAN70
US 26874RAC25	US 46115HAC16	US 46115HAJ68	US 46115HAQ02
US 26874RAD08	US 46115HAF47	US 46115HAK32	US 46115HAP29
US 29265WAA62	US 46115HAD98	US 46115HAL15	US 46115HAR84
US 29265WAB46	US 46115HAE71		