

acupay Special Update

Thursday, 02 November 2017

Germany – Acupay System Update

Additional submission check added related to beneficial owner data

Please be advised that, starting on November 6, 2017, the Acupay System will perform a check comparing the beneficial owner submission data to the DTV filer's beneficial owner data on file with the German tax authority (the "BZSt") and Acupay.

To provide background information for those who are not aware: when a German ADR/ORD reclaim is submitted using the BZSt's electronic submission process (the "DTV"), the BZSt assigns a unique number (the "BZSt Kennnummer" or "DTV BO Code") to each beneficial owner based on their tax identification number, name, entity type, and country of residence. From that point forward, any submission for the same beneficial owner will be checked against the previously submitted details based on this unique DTV BO Code. Any variation or discrepancy in the submitted beneficial owner details may lead to additional (manual) audits or reclaim rejection. In extraordinary circumstances, it could also lead to the BZSt excluding participants from being able to use the DTV process if they are under the impression that the beneficial owner details are not being entered correctly due to gross negligence or possible deception.

In order to try to support you in maintaining record accuracy and consistency, we've implemented an additional check at the submission level. Starting November 6, 2017, if there is a potential discrepancy between the submission data and the data on file when you submit for German ADR/ORD reclaims using the Acupay System, the system will inform you of the differences and highlight the affected fields in **bold red text**. You'll be able to review this information by selecting "**Click to view my records**" and then "**Review Discrepancies**" (see red boxes in images below).

RECORD DATE: June 2, 2017		PAYMENT DATE: June 20, 2017					
BULK DATA INSERT Download Worksheet and Prepare Data							
BULK DATA SUMMARY							
The data that has been entered is summarized quantitatively below...							
CUSIP / ISIN	Number of Holder Positions	Total Shares Held on Record Date	Shares Held on Record Date Subject to Reduced Tax Withholding Rate	Shares Held on Record Date <i>Not</i> Subject to Reduced Tax Withholding Rate	Gross Dividend Amount Payable	DIVIDEND AMOUNT To Be Withheld After Refund	Withholding Tax Eligible to be Returned
00254K108 / US00254K1088 <i>EUR</i>	5	7,050,000	7,050,000	0	14,100,000.00	2,115,000.00	1,603,875.00
TOTALS:	5	7,050,000	7,050,000	0	14,100,000.00	2,115,000.00	1,603,875.00
ⓘ Certain records could not be processed. Click to view records.							
REVIEW DATA							
By clicking on any of the above numbers, you may view in detail the Beneficial Investor information that has been entered. Please review all of the information to ensure that your data has been correctly interpreted.							
If you believe that the data shown does not accurately reflect what you provided, please click "Cancel Data Report" below and call Acupay at +44 20 7382 0340 in London, or +1 212 422 1222 in New York for assistance.							
Otherwise, if the data is correct, please click "Continue..." below to proceed.							
Continue...		Cancel Data Report					

RECORD DATE: June 2, 2017

PAYMENT DATE: June 20, 2017

BULK DATA INSERT | [Download Worksheet and Prepare Data](#)

BENEFICIAL INVESTORS

[Return to Summary](#)

REVIEW DISCREPANCIES

PARTICIPANT	BENEFICIAL INVESTOR	INVESTOR TYPE (LEGAL CODE)	REFERENCE #
	Smithersfield Systems Ltd	Legal Entity (e.g., Corporation) (03)	07424502-9039-92250
ISIN	CUSIP	TAX ID RESIDENCE	SHARES HELD ON RECORD DATE
US00254K1088	00254K108	123456789 US	5,000,000

[View Record Details](#)

The authorized representative has to then select the correct record(s). If the data on file is correct, simply tick the correct option, confirm the investor type and address, and click “**Continue**”. If the new submission data is correct, the old record(s) will remain on file, but will be marked as “Inactive”. Please be advised that if this latter option is chosen then a certificate of tax residence (e.g. an IRS Form 6166) will be required in order to change the record and prove that the information being entered is true and correct.

Submissions

Information You Entered *German Tax Authorities' Record(s) vs Information You Entered*

Name Smithersfield Systems Ltd	Name Smithersfield Systems LLC
Country US	Country US
Tax ID 123456789	Tax ID 123456789
<input type="radio"/> Legal Entity Code 03	<input checked="" type="radio"/> Legal Entity Code 03
Type of Investor Legal Entity (e.g., Corporation)	Select Type of Investor <input type="text" value="Legal Entity (e.g., Corporation)"/>
Address Entered 228 East 45th Street New York, NY 10038	Select Address <input type="text" value="228 EAST 45TH STREET NEW YORK, NY 10038"/>

[Continue...](#)

If you notice any issues with this update or have any questions, please don't hesitate to contact Acupay's [A-team](#).

For details on upcoming DTV submission deadlines, please visit our [Germany Resources](#) page.

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