

**Application
Procedure**

1. The income recipient (investor) shall submit this application to the income payer along with either a certificate of residence issued by the competent authority of the resident country or a document as specified by the Commissioner of National Tax Service. However, the aforementioned documents shall be submitted to the Overseas Investment Vehicle ("OIV"), in case where the GB and MSB are acquired, held and transferred via such a vehicle. The OIV shall forward the documents to the income payer.
2. In accordance with the Enforcement Rules of Income Tax Act, the income payer shall fill out Form 19-14(1), the statement of transactions and holdings of GB and MSB, and submit it to the director of the competent district tax office that has jurisdiction over the place of tax payment, along with other documents received from the income recipient (investor) or the OIV, no later than the 9th day of the month following the one in which the income payment was made.

I hereby confirm the receipt of the application for tax exemption on interest income and capital gains from investment in GB and MSB.

Year Month Day

**Director of District
Tax Office**

**Official
Seal**

Filing Instructions

1. This form is intended for use by non-residents to apply for tax exemption on interest income or capital gains from investment in GB and MSB under Article 119-3 of the Income Tax Act, or to amend the application after tax exemption has been granted. Therefore, this application is null and void if the beneficial recipient of the income is a resident of Korea.
2. For "①Type", "Overseas Investment Vehicle" that is not a "foreign corporation" under Article 2 subparagraph 3 of the Corporate Tax Act should be checked when it is an overseas private investment vehicle that is deemed a beneficial recipient of the income or an overseas public investment vehicle. An "overseas public investment vehicle" is an Overseas Investment Vehicle ("OIV"), similar to a "collective investment scheme" defined in Financial Investment Services and Capital Markets Act. It is an OIV which is either legally recognized as a public investment vehicle under the laws of the country in which it was incorporated, or one which has recommended at least 50 investors abroad to subscribe to the acquisition of securities in a preparation of an investment prospectus or similar manner.
3. "②Name". Enter the name of the income recipient. If the income recipient is a foreign national, enter the full name in English as it appears on the passport.
4. "③Address". Enter the address in the following order: a street number, a street name, a city, a state, a country and a postal code.
5. "④, ⑪ and ⑰ Taxpayer ID No.". Enter the number as instructed below:
 - A. If the person has a business registered in Korea: Business Registration Number
 - B. If the person does not have a business registered in Korea and is a(an):
 - 1) Foreign corporation: Corporate Legal Entity Identifier(LEI), Business Registration number on the Certificate of Registration of a Foreign-Invested Enterprise(IRC)
 - 2) Overseas Korean with a foreign citizenship: Overseas Korean Registration Number on your Korean Resident Card
 - 3) Foreign national: Foreign Resident Registration Number (in case of an attorney-in-fact, date of birth) if he/she is registered as a foreign resident in Korea. If he/she is not, the passport number and date of birth or Taxpayer Identification Number issued by the country of residence.
 - 4) Korean national or overseas Korean who maintains a Korean citizenship: Korean Resident Registration Number (in case of an attorney-in-fact, date of birth)
6. "⑤Date of Birth". In case where the income recipient is an individual, enter the date of birth as it appears on the passport.
7. For "⑥Country of Residence", "⑦Resident Country Code" and "⑧Nationality", enter the country abbreviation and code according to the International Organization for Standardization (ISO) Country Codes.
8. For "⑨Name of Corporate Entity (Trade Name)", enter in both English and Korean the name of the corporate entity if the income payer is a corporation, and a trade name if the income payer is an individual. For "⑩Legal Representative (Name)", enter the name of the legal representative or the business operator.
9. For "⑬Address or Location", enter the address of the income payer's head office (a place of business), or in case where there is no place of business, the income payer's address.
10. "⑭Criteria for Determining Non-Resident Status". If Applicant answers "yes" to any of the questions from A to G, he/she is determined as a resident of Korea, unless there are special countervailing circumstances. The resident/non-resident determination is made irrespective of one's status as a foreign national or a permanent resident of another country. As an exception, members of diplomatic missions in Korea and their family who belong to the same household (except those who are Korean nationals) as well as members of the US Armed Forces, civilian component and their dependents as defined in Article 1 of ROK-US Status of Forces Agreement are considered non-residents of Korea regardless of the answers to the above questionnaire.
11. Fill in "⑮~⑳" when an attorney-in-fact files an application on behalf of the Applicant. When the attorney-in-fact is not a "tax agent" as defined in Article 82 of the Framework Act on National Taxes, the application must be accompanied by a Power of Attorney and its Korean translation confirming a principal-agent relationship.

ADDENDUM TO THE FORM 19-13 (1):

- 1) If you have selected ‘Overseas Investment Vehicle [Public or Private]’ in section ①, please check the appropriate type of OIV in specific.
- (i) OPCIV which is legally recognized as a public investment vehicle under the laws of the country in which it is incorporated or established
 - (ii) Other OPCIV
 - (iii) Non-OPCIV deemed as Beneficial Owner¹
 - (iv) Non-OPCIV not deemed as Beneficial Owner² (*)
- 2) If you have selected ‘(iv) Non-OPCIV not deemed as Beneficial Owner’ in 1) above but not able to verify nor provide full information of underlying the investors, please affirm by ticking the box below.

I hereby confirm that I identify as ‘non-OPCIV not deemed as Beneficial Owner’ and cannot verify nor provide full information of underlying investors. Hence, please treat this OIV as ‘Non-OPCIV deemed as Beneficial Owner’ for the subject tax exemption application.

(*) In principle, the OIV should be able to verify its underlying investors and collect the tax exemption form with supporting documents from the underlying investors composing the OIV, and provide them to HSBC Korea. However, in an exceptional case where non-OPCIV cannot verify and provide full information of its underlying investors, the non-OPCIV can be deemed as BO as per Clause 3 of Article 119-2 ① of the Income Tax Act and submit tax exemption application in the name of itself.

(Signature)

Applicant’s Authorized Signatory: _____

Date: _____

Footnote:

- 1. Applicable to Clause 1 or 2 of Article 119-2 ① of the Income Tax Act
- 2. Applicable to Clause 3 of Article 119-2 ① of the Income Tax Act