

# Declaration of the Beneficial Owner for tax purposes in respect of the income under the notes issued by Západoslovenská energetika, a.s.

ISIN XS1782806357 / Common Code: 178280635 (the Notes)  
(the Declaration)

**Issuer:** (the Issuer)

Západoslovenská energetika, a.s., Čulenova 6, 816 47 Bratislava,  
registered in the Commercial Register of the District Court Bratislava I,

**Section:** Sa, Insert 2852/B,  
**ID No.:** 35 823 551

**Holder:**

in respect of the aggregate principal amount of the Notes of: \_\_\_\_\_ EUR<sup>2</sup>

The below signed Holder confirms/declares herewith that as at the date of this Declaration:

**(A) the Holder is the Tax Resident of:** \_\_\_\_\_ (country of domicile)  
for the purposes of the Double Taxation Treaty between \_\_\_\_\_ (country of domicile)  
and the Slovak Republic (country of the origin of the income under the Notes);

**(B) the Holder is the Beneficial Owner<sup>3</sup> of the income received under the Notes;**

**(C) the income under the Notes is not attributable to a permanent establishment of the Holder in the Slovak Republic; and**

**(D) the Holder is not a Tax Transparent Entity<sup>4</sup>.**

The Holder declares that all statements and information contained in the Declaration are up-to-date, complete and correct.

The Holder understands that the Issuer will use the Declaration and will rely on it in proceedings with the Slovak tax authorities in respect of the taxation of the income under the Notes or in connection with any related administrative or legal proceedings or official inquiries.

This Declaration does not establish any liability of the Holder in respect of any Slovak tax vis-à-vis Slovak tax authorities. The Issuer is solely responsible for taxation of the income under the Notes under Slovak tax law.

<sup>1</sup> Please specify legal name, registered seat and registration details of the Holder (i.e. relevant business registry and identification or registration number).

<sup>2</sup> Please specify the total principal amount of the Notes held by the Holder.

<sup>3</sup> **Beneficial Owner** for the purposes of Slovak tax legislation means a person/entity who receives the income for its own benefit and has the unlimited right to use this income without contractual or other legal obligation to transfer the income to another person/entity. Beneficial owner is also permanent establishment of previously mentioned person/entity if the activity connected with such income is carried out by that permanent establishment, or asset with which the income is related is functionally linked to that permanent establishment. Beneficial owner is not the person/entity who acts as an intermediary for another.

<sup>4</sup> **Tax Transparent Entity** for the purposes of Slovak tax legislation means an entity which do not tax its profit or gains at its level but in respect of which the entire profit or gains are treated as attributable to and taxable at the level of their owners or other entities.

**On behalf of the Holder:**

\_\_\_\_\_  
Place Date Name Signature

ICSD account number on which the Notes are held