
International Tax Agreements and Reporting of Shareholders

U.S. Foreign Account Tax Compliance Act (FATCA)

FATCA is a United States (U.S.) tax law which became effective as of 1 July 2014. FATCA requires financial institutions outside of the U.S. to identify specified U.S. persons, which include U.S. tax resident individuals and certain non U.S. entities with U.S. controlling persons. On November 3rd, 2015 the Romania model 1 Intergovernmental Agreement (IGA) with the U.S. for the implementation of FATCA in the Romania entered into force. Investors are hereby notified that details of specified U.S. persons' accounts directly with Fondul Proprietatea SA ("The Company") will be reported on an annual basis to Romanian Ministry of Public Finance, to the extent required by Romanian law. Details of these accounts will be automatically exchanged annually by the Romanian Ministry of Public Finance with the U.S. Internal Revenue Service, in accordance with the terms of the IGA.

Please be informed that Fondul Proprietatea SA qualifies as a Foreign Financial Institution ("FFI") under FATCA, thus being registered on the official website of the U.S. Internal Revenue Service under GIIN no. L0JJ9I.99999.SL.642.

Automatic Exchange of Information

Romania is a signatory to the Multilateral Competent Authority Agreement (the "MCAA") on the implementation of the Global Standard for the automatic exchange of financial account information. By signing the MCAA, Romania has agreed to implement regulations to enable the adoption of automatic exchange of information with all other MCAA signatory countries (whenever they sign the MCAA). The first exchange of information took place in 2017, in relation to accounts held in the 2016 calendar year.

On 9 December 2014, the European Council adopted Directive 2014/107/EU amending Directive 2011/16/EU in relation to the administrative cooperation in the field of direct taxation. Directive 2011/16/EU now provides for the automatic exchange of account information between EU member states, with reporting commencing in 2017 in relation to accounts held in the 2016 calendar year.

Shareholders registered directly with Fondul Proprietatea SA are hereby notified that the Company is required under Romanian law to report various details about shareholders resident in EU member states or MCAA signatory jurisdictions to the Romanian Ministry of Public Finance. The Romanian Ministry of Public Finance will share account data in accordance with Directive 2011/16/EU or the MCAA with the tax authority of any other EU member state or MCAA signatory jurisdiction where the account holder is tax resident.

For further information, please access the following links:

- <https://mfinante.gov.ro/domenii/impozite/acordul-fatca>
- <http://www.oecd.org/tax/exchange-of-tax-information/standard-for-automatic-exchange-of-financial-account-information-for-tax-matters-9789264216525-en.htm>
- https://static.anaf.ro/static/10/Anaf/cod_procedura/Cod_Procedura_Fiscala_11022020.htm (with the mention that the CRS provisions are found at chapter I, Title X, Annexes no. 1 and 2)
- https://static.anaf.ro/static/10/Anaf/legislatie/OMFP_1939_2016.pdf
- https://static.anaf.ro/static/10/Anaf/legislatie/OPANAF_3626_2016.pdf