

Subject: Information on the intergovernmental agreement between Greece and the USA on the application of FATCA.

On 30 November 2014, the Hellenic Republic and the United States of America (USA) signed an agreement regarding the "Foreign Account Tax Compliance Act " (FATCA).

This Intergovernmental Agreement aims at combating tax evasion by natural and legal entities who are considered to be "U.S. Persons", who have tax obligations in the USA based on residence, citizenship or other criteria, and who hold assets in financial accounts outside the USA. This agreement provides for the automatic exchange of data between the tax authorities of the two countries, Greece and the USA.

In accordance with the provisions of paragraph 2 of article 2 and of Annex I of the Intergovernmental Agreement, banks operating in Greece, either Greek or foreign, undertake to identify which of **their customers** fall under the definition of "U.S. Person" and to report, on a yearly basis, certain of their data: name, address, USA Tax Identification Number, account number, account balance or value at the end of or during the year, total gross interest credits of the depository account during the year and total gross credits of all other types of account, other than depository, during the year. The aforementioned data shall be reported to the Greek tax authorities and, more specifically, to the 6th Department - Automatic Exchange of Tax Information of the E-Government Directorate of the General Secretariat for Public Revenue of the Ministry of Finance (GG B 3058/2014), which, subsequently, shall transmit the information to the US tax authorities.

The identification of customers who may fall under the definition of "U.S. Person" shall take place according to the following criteria:

- U.S. citizenship, U.S. passport or status of permanent resident in the USA (green card).
- Place of birth in the USA.
- Valid address or correspondence address in the USA (including a PO Box in the USA).
- Current phone number in the USA.
- Direct debits for the transfer of money from a local account to an account held in the USA.
- Valid power of attorney or authorization by the customers to a natural entity with an address in the USA.
- A Hold Mail address or an In Care Of address, when such address is the only one provided by the customer to the Bank.

If, from the information you have provided to the Bank in the framework of our collaboration, it transpires that you may fall under the FATCA provisions, it is important that you complete and submit specific documents which may prove or disprove your status as a "U.S. Person".

To this effect, please find attached two (2) specific forms of the U.S. Internal Revenue Service (IRS).¹

1. ***If you are a U.S. citizen or resident or, in general, subject to taxation in the USA:*** Please complete, sign and submit the attached W-9 form.
2. ***If you are not a U.S. citizen or resident or, in general, subject to taxation in the USA:*** Please complete, sign and submit the attached W-8BEN form. We would like to point out that this form must be accompanied, on a case by case

¹ Attached W-9 and W-8BEN forms

basis, by certain additional documents. You may receive information on such documents by contacting or visiting any branch of the bank (e.g. *if you were born in the USA and had U.S. citizenship, which you no longer have, you may be asked to produce an exact copy of the document bearing the title Certificate of Loss of Nationality of the United States (CLN), which is issued by a U.S. Consulate or Embassy*).

The W-9 and W-8BEN forms and any additional documents must be submitted to the bank within three (3) months.

If you fall under the categories mentioned above and do not react within the aforementioned deadline, the Bank is obliged to transmit your data to the Greek tax authorities for further action, according to the provisions of the law, including your registration as “Non FATCA Compliant” customers, with all the consequences of such registration.

Bearing in mind the above, this timely notification allows you to collect and submit the aforementioned documents in a timely manner. You may do this at any of the bank's branches or at the unit with which you collaborate, at the same time producing this information sheet. Alternatively, you may send the required documents by post (duly completed, certified and signed) to the branch where you hold your account.

According to **law 2472/1997** on the Protection of Individuals with regard to the Processing of Personal Data, all the above mentioned documents, data and information shall be stored securely and shall be used exclusively for the purpose for which they were collected, i.e. so that the data required by the Intergovernmental Agreement regarding U.S. Persons who are our clients may correctly and with due diligence be transmitted annually to the Greek tax authorities and, more specifically, to the 6th Department - Automatic Exchange of Tax Information of the E-Government Directorate of the General Secretariat for Public Revenue of the Ministry of Finance, and, subsequently, to the USA tax authorities.

According to the provisions of articles 12 and 13 of law 2472/1997, all natural persons may access their data and object; this right, however, is limited to the amendment of the personal data concerning this natural person and which are the object of processing. The law also provides for the temporary non-use, locking, non-transfer or deletion. For the above purpose, any requests should be submitted in writing to ATTICA BANK Societe Anonyme, at the branch where the account is held, or to the Compliance & Corporate Governance Division.

In case you have already submitted the above mentioned required documents, data and information to the Bank, you are not required to take any more action.

We are at your disposal for any additional information or clarification, especially in case you would like to submit Form W-8BEN via the Compliance & Corporate Governance Division (email: compliance@atticabank.gr).