

# The Depository Trust Company

# **IMPORTANT**

**B#:** 1982

**DATE:** May 11, 2001

**TO:** Participants

**CATEGORY:** Dividends

**FROM:** Mario Zaccardi, Supervisor, Dividend Department

**ATTENTION:** Operations, Reorg & Dividend Managers, Partners, Cashiers

**SUBJECT:** TaxRelief - Switzerland  
PFD 144A Zurich FDG TR IV CUSIP: 989940200  
Record Date: 05/15/01 Payable Date: 07/18/01  
EDS Cut-off Date: 05/24/01

DTC has been notified by The Bank of New York, the paying agent for the above referenced issue, that PFD144A ZURICH FDG TR IV has declared a cash payment. This payment is subject to Swiss withholding tax of 35% which will be refunded to those U.S. residents who qualify. A specialized tax reclaim procedure has been put in place for those who qualify for 0% tax withholding.

In general, Swiss withholding tax rules require that a Swiss tax rate of 35% be withheld on distributions from certain Swiss debt issues or issues backed by debt, unless the payee satisfies certain eligibility and documentation requirements to demonstrate that they qualify for an exemption from the 35% tax.

Participants can use DTC's Elective Dividends System (EDS) function under over the Participant Terminal System (PTS) to certify all or a portion of their position entitled to the applicable tax rates.

**Note: THE DEADLINE FOR CERTIFYING OVER EDS IS MAY 24, 2001**

To qualify for an exemption for this withholding tax (0%), DTC participants must demonstrate directly that the beneficial owner qualifies for the benefits of the Swiss Treaty by:

- 1) Completing the information requested in Annex A and delivering the same to:  
The Bank of New York  
101 Barclay Street  
New York, New York  
Tel: 212 815 5206  
Fax: 212 815 3522  
Email: [bfreeney@bankofny.com](mailto:bfreeney@bankofny.com), and [lpascal@bankofny.com](mailto:lpascal@bankofny.com)  
Attention: Beverly A Freeney and Lauren Pascal

*If completed certifications are not provided to The Bank of New York on or prior to May 24, 2001, to support an EDS election, the dividend on your holdings will be paid less the maximum withholding rate.*

By certifying for the applicable favorable rate, the Participant is certifying that the criteria listed below have been met:

**Holders making incorrect declarations will be responsible for claiming or refunding any withholding tax through The Bank of New York to the Swiss Tax Authorities; Participants will also be liable for any foreign exchange fluctuations impacting the amount of their refund or claim with the Swiss Tax Authorities.**

**Important: Participants are urged to consult the PTS function TAXI before certifying their elections. Prior to using TAXI and certifying over EDS, participants are reminded to read, understand and comply with information in the "Legal Conditions" category of TAXINFO - Switzerland. Also, it is important to note that DTC does require participants to use the EDS system.**

Participants who fail to meet the EDS deadline or have other beneficial holders that are not eligible for the EDS process for whom they wish to file a reclaim may use DTC's **TaxReclaim**<sup>sm</sup> form preparation service, available by using the Tax Reclaim System (TAXR) function over PTS. **TaxReclaim**<sup>sm</sup> is DTC's proprietary withholding tax form preparation service that calculates reclaim entitlements and prepares the standard tax reclamation form for filing with the foreign taxing authorities or other designated agent. To enroll in **TaxReclaim**<sup>sm</sup>, please contact your Relationship Manager.

Questions regarding this notice may be directed to Edris Royer at (212) 855-4525 of DTC's Dividend Department or myself at (212) 855-4540 respectively.

Questions regarding the attached annex should be directed to the Beverly A Freeney of The Bank of New York at (212) 815-5206.

B# 1982

To: The Bank of New York (as Paying Agent)  
Attention: Beverly Freeney and Laureen Pascal  
Phone: 212 815 5206 or 815 4259  
E mail: bfreaney@bankofny.com and lpascal@bankofny.com

From: DTC Participant  
Name:  
Phone:  
E mail:

Date:

Security Farmers RegCaPS Funding Trust \_\_\_\_\_  
CUSIP #

<u>1</u> <u>Name Beneficial holder</u>	<u>2</u> <u>Address</u>	<u>3</u> <u>US Taxpayer Identification Number</u>	<u>4</u> <u>Custodian has been Informed that Holder is a US Tax Resident? (Y or N)</u>	<u>5</u> <u>Custodian has been Informed that Holder is a US Corporation? (Y or N)</u>	<u>6</u> <u>Number of Trust Capital Securities Owned</u>
Total					

**For Trust Capital Securities Held by Money Managers:\***

<u>Name Money Manager</u>	<u>Address</u>	<u>Percentage of Beneficial Owners that are U.S. Tax Residents</u>	<u>Number of Trust Capital Securities Owned</u>
Total			(must equal 100%)

\* Within six months of the RegCaPS Payment Date, Money Managers will provide to the Swiss Revenue the information requested in columns 1-6 above for each of its investors or beneficial owners. To the following

Swiss Revenue  
Attention:  
Telephone  
Fax  
Address