

# The Depository Trust Company

# IMPORTANT

**B#:** 2801-07

**DATE:** December 21, 2007

**TO:** All Participants

**CATEGORY:** Dividends

**FROM:** International Services

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

**SUBJECT:** TaxRelief - Country: Korea  
Shinsegae Co., Ltd CUSIP 824630107  
Record Date: 12/28/07 Payable Date: TBA  
EDS Cut-Off: 01/17/08 Cut-Off for Certification: 01/17/08

DTC has been notified by **Bank of New York/Globe Tax Services** the depository bank for the above issue, that **Shinsegae Co., Ltd - Common** has declared a taxable dividend subject to multiple tax rates depending on country of residence of the beneficial owners of the American Depositary Receipts (ADRs). In order for holders to qualify for a reduced rate of withholding tax pursuant to an applicable tax treaty, the Participants must provide to, **Bank of New York/Globe Tax Services** evidence of tax residence of the beneficial owner of the ADRs as the Korean Tax Authorities require such information in order to establish entitlement to the benefits of the applicable tax treaty. In the absence of sufficient proof that the Participant qualifies for the benefits of a tax treaty, withholding tax will be at a rate of **27.5%**.

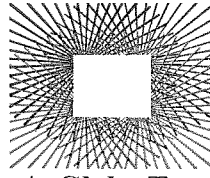
**THE DIVIDEND POSITION AND ALLOCATION HISTORY (DPAL) OPTION, ACCESSED VIA THE PTS DIVIDEND ANNOUNCEMENTS INQUIRY (DIVA) FUNCTION, SHOULD BE USED TO CONFIRM YOUR RECORD DATE POSITION HISTORY AND PAYMENT INFORMATION.**

Questions about the EDS procedure should be directed to Larry Bottigliari or Maria Lopez of DTC's International Services at (212) 855-4386 or 813-470-1545 respectively.

**Participants are advised that the tax rates are not final and subject to change.**

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*The* **BANK  
of NEW YORK**™

TO: All DTC Participants  
FROM: Bank of New York ADR Department  
SUBJECT: **Shinsegae Co. Ltd. - Common**

c/o **Globe Tax Services, Inc.**  
90 Broad Street, 16<sup>th</sup> Floor  
New York, NY 10004

CUSIP: 824630107

RECORD DATE:  
PAYABLE DATE:

**December 28, 2007**  
**TBA**

**Shinsegae Co. Ltd. - Common** has declared a taxable cash dividend subject to multiple tax rates depending on country of residence of the beneficial owners of the ADSs. In order for holders to qualify for a reduced rate of withholding tax pursuant to an applicable tax treaty, Participants must provide to **Bank of New York /GlobeTax**, the attached withholding certification regarding the beneficial owner of the ADSs as the Korean Tax Authorities require such information in order to establish entitlement to the benefits of the applicable tax treaty.

**Additionally, under the ruling KukSeChung Jae 85-18, Participants now need to provide two (2) original certificates of residency in English from beneficial owners domiciled in Belgium or the Netherlands in order to receive a reduced withholding rate.** In the absence of sufficient proof that the non-resident holder qualifies for the benefits of a tax treaty, withholding tax will be at a rate of 27.5%.

**In order for a Korea domiciled ADS holder to receive the 15.4% (Individual) or 0.0% (Institution) withholding rate, a verifiable identification number is required:**

Individuals - Passport/ Tax ID/ Resident Registration # are acceptable  
Residence Registration # is a 13-digit number (6digits-7digits)

Institutions - Company Registration/ Tax ID #  
Tax ID # is a 10-digit number (3digits-2digits-5digits)

**A COPY OF THE FORM OF IDENTIFICATION MUST BE SUBMITTED ALONG WITH THE  
WITHHOLDING CERTIFICATION FORM.**

**Please note that Korean law does not permit a non-resident holder to recover withheld tax directly from the Korean government even if the non-resident holder subsequently produces evidence that it was entitled to have tax withheld at a lower rate. All tax reclaims must be processed through the appropriate tax withholding agent in Korea.**

Participants can use the following tax chart to determine the beneficial owner's applicable tax rate. In order to certify for the country of residence and to apply for a favorable withholding tax rate for the beneficial owner(s), please input your election via the "EDS" system at DTC. In addition, please complete and return the attached certification to Bank of New York /GlobeTax as well as attach any required certification of residency documentation. A failure to return the

attached certification (on company letter paper, with an original signature) and certificates of residency on a timely basis will cause the dividend to be paid less the maximum withholding rate.

**If completed certifications are not provided to Bank of New York/GlobeTax on or prior to January 17, 2008, to support an “EDS” election, the dividend on your holdings will be paid at the maximum withholding rate.**

**NOTE: THE DEADLINE FOR CERTIFYING VIA “EDS” IS JANUARY 17, 2008. ORIGINAL CERTIFICATIONS MUST ARRIVE IN OUR OFFICES BY JANUARY 17, 2008.**

**RELIEF AT SOURCE PROCESSING IS SUBJECT TO A DEPOSITARY SERVICE CHARGE OF \$0.0035 PER ADS PER BENEFICIAL OWNER CLAIM.**

**POST PAY-DATE TAX RECLAIM PROCESSING IS SUBJECT TO A TAX RECLAIM PROCESSING FEE OF \$0.005 PER ADS WITH A MINIMUM CHARGE OF \$25 PER BENEFICIAL OWNER CLAIM.**

For additional information on the certification process, please contact Jeanny Yang at Bank of New York /GlobeTax at 1-800-915-3536, and send the original certification to: Bank of New York /GlobeTax, 90 Broad Street - 16th floor, New York, New York 10004.

( YOUR COMPANY LETTER HEAD )

To: Bank of New York / Globe Tax Services
90 Broad Street 16th Floor
New York, New York 10004-2205
Phone: 1-800-915-3536 Fax: 1-800-985-3536

Re: Withholding Certification for Shinsegae Co. Ltd. - Common Cusip: 824630107

I / We the undersigned

(contact name)

authorized representative of

(DTC Participant name)

holding ADRs at

of Shinsegae Co. Ltd. - Common Cusip: 824630107, request (DTC PTS number)

that the upcoming cash dividend payable to holders as of December 28, 2007, be paid at the preferential rate(s) indicated below or as provided on the attached shareholders listing.

Table with 5 columns: Name of Beneficial Owner, Country of Residence, ADRs Held, Tax Rate, ID Number. Includes text: PLEASE SEE ATTACHED (more than 7 Beneficial Holders)

TWO (2) ORIGINAL CERTIFICATES OF RESIDENCY IN ENGLISH ARE REQUIRED FOR BENEFICIAL OWNERS DOMICILED IN BELGIUM, OR THE NETHERLANDS.

PLEASE ACCOUNT FOR ALL SHARES INCLUDING UNCERTIFIED / INELIGIBLE BENEFICIARIES AT 27.5% WITHHOLDING RATE.

IF THERE ARE MORE THAN 7 BENEFICIAL OWNERS PLEASE CALL JEANNY YANG AT THE NUMBER ABOVE FOR A PRE-FORMATTED SPREADSHEET. PLEASE RETURN THE DISK AND THIS COVER LETTER ON LETTERHEAD WITH THE REQUIRED AUTHORIZED SIGNATURES TO THE ADDRESS ABOVE.

I / We certify that to the best of my knowledge the individual beneficial owners are eligible for the preferential rates as stated herein and I declare that I have performed all the necessary due diligence to satisfy myself as to the accuracy of the information submitted to me by these holders.

Participants will be fully liable for all withholding taxes and any claims, penalties or interest to the Korean Tax Authority or Ministry of Finance ("charge-backs"), including without limitation, any foreign exchange fluctuations associated with such funds at the time due or payable. The Bank of New York shall not be liable for the failure to secure any refund.

X Authorized Signature of Holder or Owner

TEL :

FAX:

Print Name of Signatory

Position of Signatory

PLEASE INCLUDE YOUR PHONE AND FAX NUMBER SO THAT WE CAN CONTACT YOU WITH ANY QUESTIONS THAT WE MIGHT HAVE.

RECORD DATE: DECEMBER 28, 2007

Please refer to the following chart to determine withholding tax on dividend payments on Korean issues:

COUNTRY		TOTAL TAX RATE (%)
Republic of Korea	Institutions	0.00
	Individuals	15.40
Mongolia		5.00
Albania, Brazil, Bulgaria, Chile, China, Croatia, Czech, Hungary, Jordan, Kuwait, Lao, Lithuania, Morocco, Myanmar, Oman, Poland, Rumania, Russia, Slovakia, Thailand, Vietnam, United Arab Emirates		10.00
Venezuela		11.00
Pakistan		12.50
Algeria, Australia, Austria, Bangladesh, Belarus, Belgium, Canada, Denmark, Egypt, Fiji, Finland, France, Germany, Greece, Indonesia, Ireland, Israel, Italy, Japan, Kazakhstan, Luxembourg, Malta, Mexico, Netherlands, Nepal, New Zealand, Norway, Papua New Guinea, Portugal, Singapore, Slovenia, Spain, Sri Lanka, Sweden, Switzerland, Tunisia, Ukraine, United Kingdom, Uzbekistan		15.00
South Africa, USA		16.50
India, Turkey		20.00
Philippines		27.50
Malaysia	Labuan	27.50
	Others	15.00
Other Countries, Non-Certified holders		27.50

PLEASE NOTE: TAX RATES ARE SUBJECT TO CHANGE