

**Appendix 1: Confirmation Letter  
to apply for the withholding tax exemption under Article 147 LIR**

I / We hereby certify that *[corporate shareholder name and legal form]*

.....  
.....  
.....,

Has its registered address at *[corporate shareholder address]*

.....  
.....  
.....  
.....  
.....:

**1. Is a shareholder falling within one of the categories below: (please tick the appropriate box)**

- a collective entity covered by Article 2 of the Council Directive 2011/96/EU of 30 November 2011 on the common system of taxation applicable in the case of parent companies and subsidiaries of different Member States (“EC Parent-Subsidiary Directive”)
- a fully taxable corporation which is resident in Luxembourg and is not covered by Article 2 of the EC Parent-Subsidiary Directive
- the State, a municipality, a union of municipalities, or a domestic public collective undertaking
- a domestic permanent establishment of a collective entity of any of the three categories above
- a collective entity fully liable to tax similar to the Luxembourg corporate income tax and which is resident in a country with which Luxembourg has concluded a double tax treaty, and its domestic permanent establishment
- a corporation which is resident of the Swiss Confederation and subject to Swiss corporate taxation without being exempt
- a corporation or a co-operative company resident in an EEA (European Economic Area) country other than an EU Member State and fully liable to tax similar to the Luxembourg corporate income tax
- the beneficiary is a permanent establishment of a corporation or a co-operative company resident in an EEA (European Economic Area) country other than an EU Member State

**2. Has held: (please tick all applicable boxes)**

- directly, and
- for an uninterrupted period of at least twelve months at the ex- date of the dividend
- a shareholding in SES S.A. representing at least 10% of the share capital or having an acquisition cost of at least EUR 1.200.000 (or its equivalent amount in a foreign currency) (“Qualifying Shareholding”)

**3. Has acquired the Qualifying Shareholding:**

- a. on *[insert the date of acquisition]*.....
- b. for an acquisition price of EUR *[insert the acquisition price]*.....
- c. representing the following number of shares *[insert the number of shares]*.....

**4. At the ex- date of the dividend, is holding the following number of shares in SES S.A. *[insert the number of shares]***

**5. Hereby applies with this Confirmation Letter for an exemption from withholding tax at source under Article 147 LIR.**

Certified on: .....2025

in.....

By authorised representative(s):

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Signature: \_\_\_\_\_

Name: \_\_\_\_\_

Title: \_\_\_\_\_

Signature: \_\_\_\_\_