

## Additional Information on Dividend Taxation

A dividend on the profit made in the taxation period commencing as of 1 January 2017 and later, is subject to a tax collected by withholding (withholding tax) pursuant to the Act No. 595/2003 Coll. on Income Tax, as amended (hereinafter referred to as the “Act on Income Tax”) in the Slovak Republic.

Tatra banka, a. s. is a withholding tax payer, hence obligated to withhold and pay the withholding tax on the paid dividends to the tax administrator. The shareholder will be paid a dividend after tax.

The **withholding tax deducted using the respective tax rate will be collected from the following shareholders** from the dividend on profit obtained in the taxation period commencing no earlier than as at 1 January 2017 and ending up to and including 31 December 2023:

- a) natural persons – tax residents of the Slovak Republic 7 %
- b) natural persons – tax residents of a contracting state \* 7 % or under DTPT\*\*
- c) natural persons – tax residents of a non-contracting state 35 %
- d) legal entities – tax residents of a non-contracting state 35 %

The withholding tax from the dividends on profit earned from 1 January 2017 will not be collected from the following shareholders who are **not subject to withholding tax**:

- a) legal entities – residents of the Slovak Republic
- b) legal entities – residents of a contracting state

**\*A contracting (or also cooperating) state** is a state with a concluded international double taxation prevention treaty or international contract on exchange of tax-related information with the Slovak Republic, or the states which are the contracting states of an international contract containing provisions related with an exchange of information for tax purposes in a similar extent the given state and the Slovak Republic are bound by.

The list of contracting states is published by the Ministry of Finance of the Slovak Republic and is updated as at 1 January of the respective calendar year. The list of contracting states applicable as of 1 January 2024 to 31 December 2024 is published on the portal of the MFSR: <https://www.mfsr.sk/sk/dane-cla-uctovnictvo/priame-dane/dane-z-prijmu/platne-ucinne-medzinarodne-zmluvy-podla-2-pism-x-zakona-c-595/2003-z-z-zeni-neskorsich-predpisov/>

**\*\* DTPT – Double Taxation Prevention Treaty.** A shareholder – natural person and tax resident of a contracting state with a concluded international double taxation prevention treaty with the Slovak Republic, where a lower tax rate than the tax rate applicable under the Act on Income Tax is arranged for dividends, is obligated to submit the bank a **confirmation of tax domicile issued by the shareholder’s tax administrator** in order to claim the given lower tax rate. The tax rate is arranged in the respective DTPT predominantly in Article 10 of the Treaty. Such shareholder is obligated to update the confirmation for each following dividend payment. If the confirmation is not submitted, the bank will apply the rate pursuant to the applicable Act on Income Tax for such shareholder, which currently amounts to 7 %.

A shareholder with a permanent residence / seat is in a non-contracting state and a tax domicile is in a contracting state or in the Slovak Republic, is obligated to submit the bank a confirmation of tax domicile issued by the shareholder’s tax administrator. Such shareholder is obligated to update the confirmation for each following dividend payment. If the confirmation is not submitted, the bank will apply the rate pursuant to the applicable Act on Income Tax for such shareholder, which currently amounts to 35 %.