

# Attachment: Statement of the Shareholding of the Beneficiary With The Organization Chart

Name of Trust Withholding Agency		Tax Code No. of Trust Withholding Agency							
<p><b>Instructions:</b></p> <p>1. This form must be completed separately for each trust withholding agency. If the trust property includes shares of multiple CFCs, please complete one form for each CFC. Please replicate the form if additional space is needed.</p> <p>2. When the settlor has designated shares or capital of affiliated enterprises located in a low-tax country outside the Republic of China (hereinafter referred to as "low-tax jurisdiction") as trust property and such affiliated enterprises in low-tax jurisdictions qualified as CFCs of the beneficiary, and the beneficiary is subjected to Article 43-3 of the Income Tax Act or Article 12-1 of the Income Basic Tax Act, the ratio of the column "Direct Shareholding Ratio of Trust Equity" shall be calculated as follows:</p> <p>(1) If the beneficiary has been identified and specified, please fill in their shareholding details. The Direct Shareholding Ratio of Trust Equity for a beneficiary is calculated by multiplying the trust shareholding ratio designated by the settlor with the benefit distribution proportion of the beneficiary. Additionally, please fill in the information of the beneficiary's direct shareholding ratio outside the trust.</p> <p>(2) If the beneficiary has not been determined, the settlor shall be deemed the beneficiary for the undetermined portion. Please calculate the Direct Shareholding Ratio of Trust Equity for the settlor based on the previous provision and fill in information of the settlor's direct shareholding ratio outside the trust.</p> <p>3. If "Yes" is ticked for all columns from F1 to F3 of the "Inspection of Substantial Operating Activities," please tick "Yes" in the column "Does the CFC Have Substantial Operating Activities in its Country or Region?" in Part 1 of the "Income Statement of a Controlled Foreign Company (CFC)" statement.</p>									
<b>General Information of CFC</b>									
Chinese Name									
English Name									
Tax Identification Number/Other Identification Number									
Country Code of Low-tax Country (or Jurisdiction)									
Inspection of Substantial Operating Activities	Does the CFC have a fixed place of business in its registered place? (F1)				<input type="checkbox"/> Yes, Address: _____; <input type="checkbox"/> No				
	Does the CFC recruit employees to carry out actual operating business in its registered place? (F2)				<input type="checkbox"/> Yes, Number of Employees: _____; <input type="checkbox"/> No				
	Is the income ratio calculated in accordance with Subparagraph 2, Paragraph 2, Article 5 of the Regulations Governing Application of Controlled Foreign Company Income < 10% (F3)?				<input type="checkbox"/> Yes, Ratio: _____; <input type="checkbox"/> No				
No.	Beneficiary/ Settlor	Name	ID No./Business Administration Number	Direct Holding Ratio of CFC		Indirect Holding Ratio of CFC (Held by a related party or a nominal party) (%)	Direct and Indirect Holding Ratio of CFC (%)		
				Direct Shareholding Ratio of Trust Equity (%)	Direct Shareholding Ratio Outside the Trust (%)				
The organizational chart for the beneficiary or settlor and their related parties									

Copy I: For Data Entry

Copy II: For Tax Jurisdiction

**Date:**

Statement No.	
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Receipt No.	
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