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CGN Power Co., Ltd.*

中國廣核電力股份有限公司

(A joint stock company incorporated in the People's Republic of China with limited liability)

(Stock Code: 1816)

INDICATIVE ANNOUNCEMENT ON ENTITLEMENT OF INDIVIDUAL H SHAREHOLDERS TO PREFERENTIAL TAX RATE IN RELATION TO CASH DIVIDEND

References are made to the announcement dated May 27, 2022 in relation to poll results of 2021 Annual General Meeting and the overseas regulatory announcement dated June 30, 2022 in relation to implementation of annual equity distribution for 2021 of CGN Power Co., Ltd.* (the “**Company**”).

Pursuant to the profit distribution plan approved at the 2021 Annual General Meeting, payment of the annual cash dividend for 2021 was made by the Company on July 7, 2022 as planned.

According to Guo Shui Han [2011] No. 348 (《國稅函[2011]348號》) (the “**No. 348 Notice**”) issued by the State Administration of Taxation of the People’s Republic of China, for individual H shareholders of the Company, the Company shall withhold and pay individual income tax for the dividend. Meanwhile, individual H shareholders of the Company may be entitled to related preferential tax treatments pursuant to the tax treaties between the PRC and the countries in which they are domiciled and the tax arrangements between Mainland China and Hong Kong (Macau). In accordance with the current applicable administrative requirements of the Shenzhen Municipal Taxation Bureau of the State Taxation Administration (the “**STB**”), the competent tax authority in the place of registration of the Company, an individual Hong Kong (Macau) shareholder shall file a tax return in accordance with the current applicable requirements of the “Application for Tax Treaty Treatment for Non-resident Taxpayers” (《非居民納稅人享受稅收協定待遇辦理》) (as may be amended and modified from time to time) (the “**Regulations**”) as published by the STB (website: <https://shenzhen.chinatax.gov.cn>). Those who fail to file the tax return as required will be subject to a 20% tax rate.

Pursuant to the No. 348 Notice, the Company has withheld the tax at a tax rate of 20%. If the Company's individual H shareholders who have received cash dividend for 2021 and are qualified (the **"Qualified Shareholders"**) and intend to enjoy the tax benefits, they are required to make the application in accordance with the current applicable requirements of the Regulations. Based on the current communications among the Company, the STB and the relevant banks, the Qualified Shareholders who wish to enjoy the tax benefits are required to submit the relevant information with the STB through the Company. Upon approval by the STB, the Company will arrange the relevant banks to pay the amount of tax refund to the bank accounts of the Qualified Shareholders. Specific procedures and time required for tax refund are summarized as follows for reference:

- (i) The Qualified Shareholders shall submit the information in relation to tax benefits and materials for verification and collection of tax refund to the Company, and it takes about 3 to 5 working days for the Company to make the application to the STB for the tax benefits;
- (ii) Upon approval of the application for tax benefits by the STB, it will take about 30 working days for the STB to issue the "Notice of Tax Matters" (《稅務事項通知書》) to the Company, notifying the Company of the result of the application; and
- (iii) Upon receiving the "Notice of Tax Matters" from the STB, it takes about 5 working days for the Company to submit the relevant information to the relevant banks as required for them to deposit the tax refund amount to the bank accounts of the Qualified Shareholders.

In accordance with the current applicable Regulations and the requirements of the relevant banks, the Qualified Shareholders are required to provide the following information in order to make the application for tax benefits and to collect payment of tax refund:

- (i) The Certificate of Tax Resident Status (《稅收居民身份證明》) for the previous year issued by the tax authority in the place of his/her place of residence or similar supporting documents evidencing the tax residency (such as the Certificate of Resident Status issued by the Hong Kong competent authority);
- (ii) Fill in the attached form "Information Reporting Form for Non-resident Taxpayers Claiming Treaty Benefits" and have it signed or stamped by the Qualified Shareholders;
- (iii) Identity documents of the Qualified Shareholders, including the "Dividend Notice" (《股息通知書》), the securities account number and personal identification information (such as Mainland Travel Permit for Hong Kong and Macau Residents (Home Return Permit) or HKID card or passport); and
- (iv) Information on the Qualified Shareholders' receiving bank accounts, including name of the payee's bank account, number of the payee's bank account, address of the payee, and the name and address of the receiving bank.

According to the communications between the Company and the STB, the Qualified Shareholders are required to send clear scanned copy of the abovementioned necessary information to the email address of the Company (IR@cgnpc.com.cn) and provide their contact number no later than October 31, 2022. The Company will only use the relevant information for the purpose of assisting the Qualified Shareholders to commence the work in relation to the application for tax benefits. The Qualified Shareholders are required to ensure accuracy and completeness of the relevant information. Should the STB or the relevant banks request for any further information of the Qualified Shareholders in handling the tax benefits application, the Company will contact the Qualified Shareholders by email and/or phone at the phone number provided by the Qualified Shareholders to the Company.

Whether or not the Qualified Shareholders can enjoy the tax benefits successfully will still be subject to the requirements of the STB and its review procedures. It is the responsibility of each of the Qualifying Shareholders to make the application for tax benefits in accordance with the requirements of the current applicable Regulations. In order to assist the Qualifying Shareholders, the Company will play a facilitating and coordinating role and use its best endeavours to assist the Qualified Shareholders to maintain a close communication with the STB and facilitate the work in relation to the application for tax benefits.

By Order of the Board
CGN Power Co., Ltd.*

Yin Engang

Chief Financial Officer, Joint Company Secretary and Board Secretary

The PRC, August 11, 2022

As at the date of this announcement, the Board of the Company comprises Mr. Gao Ligang and Mr. Jiang Dajin as executive Directors; Mr. Yang Changli, Mr. Shi Bing, Mr. Wang Hongjun and Mr. Gu Jian as non-executive Directors; Mr. Li Fuyou, Mr. Yang Jiayi, Mr. Xia Ceming and Mr. Tang Chi Cheung as independent non-executive Directors.

* *For identification purpose only*

附表 Attach Form(s)

非居民纳税人享受协定待遇信息报告表
Information Reporting Form for Non-resident Taxpayers Claiming Treaty Benefits

金额单位：人民币元（列至角分）

Monetary unit: RMB Yuan (Keep two decimal places)

非居民纳税人填写第1项至第17项信息，并对填报信息的真实性、准确性、合法性承担法律责任。 Non-resident Taxpayers fill in the blanks of item 1 to 17 and take legal responsibility for the authenticity, accuracy and legitimacy of the information.			
1. 中文名称 Name in Chinese		2. 在中国的纳税人识别号（统一社会信用代码） Tax identification number in China (Uniform social credit code)	
3. 在居民国（地区）名称 Name in resident jurisdiction		4. 在居民国（地区）的纳税人识别号 Tax identification number in resident jurisdiction	
5. 在中国的联系地址、邮政编码 Contact address and zip code in China		6. 在中国的联系电话 Telephone number in China	
7. 在居民国（地区）的联系地址、邮政编码 Contact address and zip code in resident jurisdiction		8. 在居民国（地区）的联系电话 Telephone number in resident jurisdiction	
9. 居民国（地区） Resident jurisdiction		10. 电子邮箱 E-mail address	
11. 享受协定名称 The applicable treaty	内地和香港特别行政区关于对所得避免双重征税和防止偷漏税的安排	12. 适用协定条款名称 Applicable articles of the treaty	股息
13. 非居民纳税人是否取得缔约对方税务当局开具的证明非居民纳税人取得所得的当年度或上一年度税收居民身份的税收居民身份证明 Whether the non-resident taxpayer obtained the tax resident certificate issued by the competent tax authority of the other contracting jurisdiction to prove the residence status of non-resident taxpayer for the year or its previous year during which the payment is received			<input checked="" type="checkbox"/> 是 Yes <input type="checkbox"/> 否 No
14. 享受协定待遇所得金额 Amount of the income with respect to which tax treaty benefits are claimed		15. 享受协定待遇减免税额 Amount of tax reduced or exempted	
16. 适用股息、利息、特许权使用费条款时，非居民纳税人为“受益所有人”的政策依据是《国家税务总局关于税收协定中“受益所有人”有关问题的公告》（国家税务总局公告2018年第9号）的： <input type="checkbox"/> 第二条； <input type="checkbox"/> 第三条第（一）项； <input type="checkbox"/> 第三条第（二）项； <input type="checkbox"/> 第四条； <input type="checkbox"/> 其他：请说明_____。 If the article of dividends, interest or royalties is applied, the policy basis for non-resident taxpayer to be the "beneficial owner" is the <input type="checkbox"/> Article 2; <input type="checkbox"/> Item 1 of Article 3; <input type="checkbox"/> Item 2 of Article 3; <input type="checkbox"/> Article 4; <input type="checkbox"/> Others: Please specify _____ of the <i>Public Notice of the State Taxation Administration on "Beneficial Owner" set forth in Double Taxation Agreements</i> (Public Notice [2018] No.9 of the State Taxation Administration).			
17. 我谨声明：根据缔约对方法律法规和税收协定居民条款，我为缔约对方税收居民，相关安排和交易的主要目的不是为了获取税收协定待遇。我自行判断符合协定待遇条件，自行享受协定待遇，承担相应法律责任。我将按规定归集和留存相关资料备查，接受税务机关后续管理。 I hereby declare: According to the laws, regulations of the other contracting jurisdiction and the article of resident of the tax treaty, I am a resident of the other contracting jurisdiction, the principal purpose of the relevant arrangement and transaction is not to obtain tax treaty benefits. Through self-assessment, I believe that I am in conformity with the conditions for claiming tax treaty benefits, so I will enjoy tax treaty benefits. Therefore, I take due legal responsibilities. I will collect and retain relevant materials for review in accordance with the regulations, and accept the follow-up administration of the tax authority. 非居民纳税人签章或签字 Seal or signature of non-resident taxpayer <div style="float: right; text-align: right;"> 年 月 日 Y M D </div>			
以下信息不需要非居民纳税人填写 Non-resident taxpayers do not need to fill in the following blanks			
18. 扣缴义务人名称 Name of withholding agent			
19. 扣缴义务人纳税人识别号（统一社会信用代码）： <input type="text"/> Tax identification number of withholding agent (Uniform social credit code)			
经办人签字： Signature of the case handler; 经办人身份证件号码： ID number of the case handler; 扣缴义务人签章： Seal of the withholding agent:	经办人签字： Signature of the case handler; 经办人身份证件号码： ID number of the case handler; 代理机构签章： Seal of the tax agent; 代理机构统一社会信用代码： Uniform social credit code of the tax agent:	受理人： Received by: 受理税务机关（章）： Tax authority in charge (Seal): 受理日期： 年 月 日 Date of case acceptance: Y M D	

国家税务总局监制

Notes to completing the “Information Reporting Form for Non-resident Taxpayers Claiming Treaty Benefits” form:

- (i) Please leave the inapplicable items blank;
- (ii) “Amount of the income with respect to which tax treaty benefits are claimed” of item 14 equals to the number of H shares as stated in the “Dividend Notice” multiplied by dividend per share (for example, in respect of the final dividend of the Company for the year of 2021, dividend per share was RMB0.084 (tax inclusive)); and
- (iii) “Amount of tax reduced or exempted” of item 15 equals to “Amount of the income with respect to which tax treaty benefits are claimed” of item 14 multiplied by 10%.