

Legal entity

[holding less than 10% of share capital or invested less than EUR 1.2 million]

Step-by-Step Guide for Shareholders on Dividend Taxation & Payment [2025]

Estonia

You are eligible to a withholding tax at a reduced rate of 10% via double tax treaty concluded between Luxembourg and Estonia. The dividends are taxed when redistributed in Estonia. The withheld tax can be credited to offset the part of corporate income tax payable on the received dividends.

Important note!

Given that the tax payable in Estonia can be decreased by the amount of withholding tax applied in Luxembourg, we recommend investors to consider if it is beneficial for them to claim application of the decreased withholding tax rate due to administrative resources needed.

If you would still like to opt for a reduced withholding tax (please consider the beforementioned fact and administrative burden), the procedure is following:

1. Submit Modele 901bis originals (confirmed and physically signed by you and your tax authority) to:
To: AS Eleving Vehicle Finance Investors relations department
52 Skanstes Street, Riga, LV-1013, Latvia
2. Send at least 5 business days before dividend payment date
If not submitted on time -> 15% WHT applies by default
3. After payment: send bank statement showing dividend received and tax withheld to investors@eleving.com

Latvia

You are eligible to a withholding tax at a reduced rate of 10% via double tax treaty concluded between Luxembourg and Latvia. Further redistribution of dividends is not taxable.

1. Submit Modele 901bis originals (confirmed and physically signed by you and your tax authority) to:
To: AS Eleving Vehicle Finance Investors relations department
52 Skanstes Street, Riga, LV-1013, Latvia

2. Send at least 5 business days before dividend payment date
If not submitted on time -> 15% WHT applies by default

3. After payment: send bank statement showing dividend received and tax withheld to investors@eleving.com

Lithuania

You are eligible to a standard withholding tax at a 15% rate. The received dividends are exempt if received from EEA entity paying corporate income tax.



No actions further required

Germany

You are eligible to a standard withholding tax at a 15% rate. The dividends are taxed under German corporate income tax rules. The withheld tax can be credited to offset the part of corporate income tax payable on the received dividends.



No actions further required

Others

You are eligible either to a standard withholding tax at a 15% rate to be applied, or we encourage you to check whether double tax treaty between Luxembourg and your country of tax residence has opted for a decreased rate of withholding tax.

If under the double tax treaty you may opt for reduced withholding tax, the procedure is following:

Important note!

If the double tax treaty opts for reduced rate, please consider whether the withheld tax can be credited against the corporate income tax (if applicable). In case if the corporate income tax is higher than 15%, we recommend investors to consider if it is beneficial for them to claim application of the decreased withholding tax rate due to administrative resources needed, if either way the withholding tax may be credited against future corporate income tax.

If you would still like to opt for a reduced withholding tax (please consider the beforementioned fact and administrative burden), the procedure is following:

1. Submit Modele 901bis originals (confirmed and physically signed by you and your tax authority) to:
To: AS Eleving Vehicle Finance Investors relations department
52 Skanstes Street, Riga, LV-1013, Latvia
2. Send at least 5 business days before dividend payment date
If not submitted on time -> 15% WHT applies by default
3. After payment: send bank statement showing dividend received and tax withheld to investors@eleving.com

If double tax treaty does not provide for a reduced withholding tax rate



No actions further required

To do:

Dividend payment:

If all the necessary documents are submitted to Eleving Group S.A.	If documents are not submitted on time
85% paid on dividend date Final 5% paid after documents + bank statement are submitted	You may claim a refund later using 901bis directly with Luxembourg tax office (can take 12+ months)

If all the necessary documents are submitted to Eleving Group S.A.	If documents are not submitted on time
85% paid on dividend date Final 5% paid after documents + bank statement are submitted	You may claim a refund later using 901bis directly with Luxembourg tax office (can take 12+ months)

No actions further required

No actions further required

If all the necessary documents are submitted to Eleving Group S.A.	If documents are not submitted on time
85% paid on dividend date The difference in the tax (at a reduced rate) paid after documents + bank statement are submitted	You may claim a refund later using 901bis directly with Luxembourg tax office (can take 12+ months)

No actions further required

Documents to be provided:

Modele 901bis + Bank statement proving the receipt of dividends

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No actions further required

No actions further required

Modele 901bis + Bank statement proving the receipt of dividends

No actions further required