

GERMAN PARTIAL TAX EXEMPTION MEMO

February 2019

What has happened?

Due to reforms in the German tax regime and new legislative requirements, the tax classification of the WisdomTree UCITS equity exchange traded funds (UCITS equity ETFs) has been changed to “without partial exemption”.

What does this mean for German investors?

The following is a summary of some of the key points:

- + We expect our UCITS equity ETFs to remain eligible for the equity-related partial tax exemption in Germany (30% of investment income for private investors, 60% for business investors and 80% for corporations).
- + Nothing in the way such products replicate their underlying indices has changed, the change in classification relates only to a change in the relevant legislation relating to disclosure of relevant information by WisdomTree.
- + WisdomTree will continue to report its equity ratio on a daily basis, which we expect will remain above the existing threshold of 50%. Such daily reporting can be found on the individual product pages on the WisdomTree website for each of the UCITS equity ETFs listed below (please see the ‘German Tax Reporting’ document).
- + WisdomTree will be providing the year-end reporting required for investors to claim the partial tax exemption (tax exemption rates ranging from 30% to - 80%, depending on the tax nature of the investor) - see below for details.

Which products does this impact?

These changes impact the following sub-funds and share classes:

ISIN	Fund Name	WKN
DE000A2JLJC9	WisdomTree EUR Aggregate Bond Enhanced Yield UCITS ETF – EUR	A2JLJC
DE000A2JLJD7	WisdomTree EUR Aggregate Bond Enhanced Yield UCITS ETF – EUR Acc	A2JLJD
DE000A2JLJE5	WisdomTree EUR Government Bond Enhanced Yield UCITS ETF	A2JLJE
DE000A2JLJF2	WisdomTree EUR Government Bond Enhanced Yield UCITS ETF – EUR Acc	A2JLJF
DE000A2JLJA3	WisdomTree AT1 CoCo Bond UCITS ETF – USD	A2JLJA

DE000A2JRN56	WisdomTree AT1 CoCo Bond UCITS ETF – EUR Hedged	A2JRN5
DE000A2N7NJ6	WisdomTree Artificial Intelligence UCITS ETF - USD Acc	A2N7NJ
DE000A2AHL75	WisdomTree Global Quality Dividend Growth UCITS ETF - USD Acc	A2AHL7
DE000A2DJWH8	WisdomTree India Quality UCITS ETF - USD	A2DJWH
DE000A2DJWJ4	WisdomTree India Quality UCITS ETF - USD Acc	A2DJWJ
DE000A2JEFE8	WisdomTree CBOE S&P 500 PutWrite UCITS ETF - USD Acc	A2JEFE
DE000A14NDZ0	WisdomTree Emerging Markets Equity Income UCITS ETF	A14NDZ
DE000A2ARXF9	WisdomTree Emerging Markets Equity Income UCITS ETF Acc	A2ARXF
DE000A14ND04	WisdomTree Emerging Markets Small Cap Dividend UCITS ETF	A14ND
DE000A14ND12	WisdomTree US Equity Income UCITS ETF	A14ND1
DE000A2ARXG7	WisdomTree US Equity Income UCITS ETF Acc	A2ARXG
DE000A2AS9T2	WisdomTree US Equity Income UCITS ETF - EUR Hedged Acc	A2AS9T
DE000A14ND20	WisdomTree US Small Cap Dividend UCITS ETF	A14ND2
DE000A14ND38	WisdomTree Europe Equity Income UCITS ETF	A14ND3
DE000A14ND46	WisdomTree Europe Small Cap Dividend UCITS ETF	A14ND4
DE000A2ARXE2	WisdomTree Europe Small Cap Dividend UCITS ETF Acc	A2ARXE
DE000A140SG3	WisdomTree Emerging Asia Equity Income UCITS ETF	A14SG
DE000A142K45	WisdomTree Germany Equity UCITS ETF - EUR Acc	A142K4
DE000A14SLH0	WisdomTree Japan Equity UCITS ETF - USD Hedged	A14SLH
DE000A142K60	WisdomTree Japan Equity UCITS ETF - EUR Hedged Acc	A142K6
DE000A142K78	WisdomTree Japan Equity UCITS ETF - JPY Acc	A142K7
DE000A14SLJ6	WisdomTree Europe Equity UCITS ETF - USD Hedged	A14SLJ
DE000A142K52	WisdomTree Europe Equity UCITS ETF - EUR Acc	A142K5
DE000A2AE1R9	WisdomTree Enhanced Commodity UCITS ETF - USD Acc	A2AE1R
DE000A2JRN64	WisdomTree Enhanced Commodity UCITS ETF – EUR Hedged Acc	A2JRN6
DE000A2AHL91	WisdomTree Eurozone Quality Dividend Growth UCITS ETF - EUR Acc	A2AHL9
DE000A2AGPX1	WisdomTree US Quality Dividend Growth UCITS ETF - USD Acc	A2AGPX

What year-end reporting will be provided by WisdomTree?

In respect of the calendar year ending 31 December 2018 and for subsequent years, WisdomTree Issuer plc will provide for the share classes listed above, after each calendar year end, sufficient tax reporting according to section 20 para 4 German Investment Tax Act 2018 so that German investors can claim the partial tax exemption for equity funds or mixed funds in their annual tax returns, if applicable.

What are the next steps?

We are continuing to review the options available in relation to German tax reporting. Any changes to our approach will be communicated to investors and intermediaries in a similar manner to this memo.

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