CERTAIN TAX CONSIDERATIONS

The following summary discusses certain United States tax considerations related to the purchase, ownership and disposition of our Shares and RDSs as of 1 April 2008. Purchasers of our Shares and the RDSs are advised to consult their own tax advisors concerning the consequences under the tax laws of the country of which they are resident of an investment in our Shares or the RDSs.

The following is a summary of certain U.S. federal income tax considerations relating to the purchase, ownership and disposition of Shares and RDSs by U.S. Holders (as defined below) that hold such Shares or RDSs as capital assets. This summary is based on the U.S. Internal Revenue Code of 1986, as amended (the "Code"), U.S. Treasury regulations promulgated or proposed thereunder and administrative and judicial interpretations thereof, all as in effect on the date hereof and all of which are subject to change, possibly with retroactive effect, or to different interpretation. This summary is for general information only and does not address all of the tax considerations that may be relevant to specific U.S. Holders in light of their particular circumstances or to U.S. Holders subject to special treatment under U.S. federal income tax law (such as banks, insurance companies, tax-exempt entities, retirement plans, regulated investment companies, dealers in securities, real estate investment trusts, certain former citizens or residents of the United States, persons who hold Shares or RDSs as part of a straddle, hedge, conversion transaction or other integrated investment, U.S. persons that have a "functional currency" other than the U.S. dollar, persons that own (or are deemed to own) 10% or more of our Shares or RDSs, persons that generally mark their securities to market for U.S. federal income tax purposes, controlled foreign corporations or passive foreign investment companies). This summary does not address any U.S. state or local or non-U.S. tax considerations or any U.S. federal estate, gift or alternative minimum tax considerations. In addition, this summary is based, in part, upon representations made by the depositary to us and assumes that the restricted deposit agreement, and all other related agreements, will be performed in accordance with their terms.

As used in this summary, the term "U.S. Holder" means a beneficial owner of Shares or RDSs that is, for U.S. federal income tax purposes, (i) an individual who is a citizen or resident of the United States, (ii) a corporation created or organized in or under the laws of the United States, any state thereof, or the District of Columbia, (iii) an estate the income of which is subject to U.S. federal income tax regardless of its source or (iv) a trust with respect to which a court within the United States is able to exercise primary supervision over its administration and one or more U.S. persons have the authority to control all of its substantial decisions, or an electing trust that was in existence on August 19, 1996 and was treated as a domestic trust on that date.

If an entity treated as a partnership for U.S. federal income tax purposes holds Shares or RDSs, the tax treatment of such partnership and each partner thereof will generally depend upon the status and activities of the partnership and such partner. Any such entity should consult its own tax advisor regarding the U.S. federal income tax considerations applicable to it and its partners of the purchase, ownership and disposition of Shares or RDSs.

SHAREHOLDERS ARE URGED TO CONSULT THEIR OWN TAX ADVISORS AS TO THE PARTICULAR TAX CONSIDERATIONS APPLICABLE TO THEM RELATING TO THE PURCHASE, OWNERSHIP AND DISPOSITION OF SHARES AND RDSS, INCLUDING THE APPLICABILITY OF U.S. FEDERAL, STATE AND LOCAL TAX LAWS AND NON-U.S. TAX LAWS. IN PARTICULAR, WE EXPECT THAT WE WILL BE TREATED AS A PFIC (AS DEFINED BELOW) FOR U.S. FEDERAL INCOME TAX PURPOSES AND, CONSEQUENTLY, PROSPECTIVE INVESTORS SHOULD CONSULT THEIR OWN TAX ADVISORS REGARDING THE TAX CONSIDERATIONS RELATING TO AN INVESTMENT IN A PFIC.

RDSs

A U.S. Holder that owns RDSs will generally be treated, for U.S. federal income tax purposes, as the owner of the underlying Shares that are represented by such RDSs. Accordingly, deposits or withdrawals of Shares for RDSs will generally not be subject to U.S. federal income tax.

Passive Foreign Investment Company—General Considerations

In general, a corporation organized outside the United States will be treated as a passive foreign investment company ("PFIC") for U.S. federal income tax purposes in any taxable year in which either (i) at least 75% of its gross income is "passive income" or (ii) on average at least 50% of the value of its assets is attributable to assets that produce passive income or are held for the production of passive income. Passive income for this purpose generally includes, among other things, dividends, interest, royalties, rents and gains from commodities and securities transactions and from the sale or exchange of property that gives rise to passive income. Based on our projected income, assets and activities, we expect that we will be treated as a PFIC for the current taxable year and taxable years thereafter. The remainder of this summary assumes that we are and will continue to be a PFIC. We may also hold, directly or indirectly, interests in other entities that are PFICs, including our Corporate Subsidiaries ("Subsidiary PFICs").

If a U.S. Holder does not validly make either (i) a "qualified electing fund" ("QEF") election (as described below) in respect of our company and each Subsidiary PFIC for which it has QEF election filing responsibility or (ii) a "mark to market election" in respect of our Shares (as described below under "Mark-to-Market Election"), effective in either case as of the beginning of the U.S. Holder's holding period, the U.S. Holder generally will be subject to the adverse tax consequences described below under "—No Qualified Electing Fund Election and No Mark-to-Market Election". Unless otherwise specified, the remainder of this discussion assumes that each U.S. Holder will make a valid QEF election in respect of our company and each Subsidiary PFIC for which it has QEF election filing responsibility, effective as of the beginning of its holding period.

Qualified Electing Fund Election

If a U.S. Holder validly makes a QEF election with respect to our company, the U.S. Holder generally will be required to include currently in gross income its pro rata share of our ordinary earnings and net capital gains, if any, for each taxable year we are a PFIC, whether or not we make any cash distributions in that year. As a result, a U.S. Holder may have to pay taxes currently on amounts not yet received and which may never be received. Income inclusion generally will be required whether or not the U.S. Holder owns Shares or RDSs for an entire taxable year or at the end of our taxable year. The amount included in income generally will be treated as ordinary income to the extent of the U.S. Holder's allocable share of our ordinary earnings and as long-term capital gain to the extent of the U.S. Holder's allocable share of our net capital gains. In addition, any net losses we incur in a taxable year will not be available to such U.S. Holder and may not be carried back or forward in computing our ordinary earnings and net capital gain in other taxable years.

The amount included in income under the QEF rules generally is treated as income from sources outside the United States for U.S. foreign tax credit purposes. However, if 50% or more of our Shares (by vote or value) are treated as held by U.S. persons, we will be treated as a United States-owned foreign corporation and the amount included in income under the QEF rules generally will be treated as income from sources outside the United States to the extent attributable to our non-U.S. source income, and as income from sources within the United States to the extent attributable to our U.S. source income, for U.S. foreign tax credit purposes. We cannot assure you that we will not be treated as a United States-owned foreign corporation.

Amounts previously included in income by a U.S. Holder under the QEF rules generally will not be subject to tax when they are actually distributed to the U.S. Holder. A U.S. Holder's tax basis in the Shares or RDSs generally will increase by any amounts so included under the QEF rules and decrease by any amounts not included in income when distributed.

We may not make cash distributions to our shareholders. If we do not make cash distributions, U.S. Holders that make a QEF Election generally will have to satisfy any tax obligation arising from their investments in our Shares or RDSs from sources other than distributions from us. A U.S. Holder generally may elect to extend the time for payment of the U.S. federal income tax due on undistributed income includable by reason of a QEF election. The extension generally terminates when a distribution attributable to the income on which tax was deferred is made or upon certain transfers or pledges of the related Shares

or RDSs or termination of the QEF election. Interest is imposed on the deferred tax and must be paid when the extension terminates. U.S. Holders should consult their own tax advisers regarding this election.

Indirect Investments in PFICs—Subsidiary PFICs

As described above under "—Passive Foreign Investment Company—General Considerations," we may hold interests in Subsidiary PFICs. U.S. Holders will generally be responsible for filing a separate QEF election with respect to a Subsidiary PFIC that we hold directly or through one or more non-U.S. entities. If we hold a Subsidiary PFIC through a U.S. entity, including a fund, only the first U.S. entity in the chain of ownership will be eligible to file a QEF election, if available, with respect to the Subsidiary PFIC. If a QEF election is validly made in respect of a Subsidiary PFIC, the tax consequences described above under "Qualified Electing Fund Election" will generally apply to the U.S. Holder in respect of the PFIC to which the election applies.

To the extent practicable, we intend to hold Subsidiary PFICs through a Delaware limited partnership, (the "Delaware LP"), which is expected to be treated as a domestic partnership for U.S. federal income tax purposes. We intend to cause the Delaware LP to make QEF elections with respect to each such non-U.S. corporation that it owns and is treated as a Subsidiary PFIC. In turn, we will include in our calculation of PFIC income for the taxable year the amount attributable to the Delaware LP's QEF inclusions associated with any investment in a Subsidiary PFIC, which will affect the amounts included in income by U.S. Holders as QEF inclusions from us. There can be no assurances that, either as a result of a change in law or a contrary conclusion by U.S. tax authorities, the Delaware LP will be able to make and maintain a QEF election with respect to such subsidiaries or that the QEF elections made by the Delaware LP or its status as a domestic partnership will be respected by the IRS.

The rules applicable to indirect investments in Subsidiary PFICs are complex. U.S. Holders would be required to make a separate QEF election for any such PFIC not held through the Delaware LP if they wanted to treat it as a QEF, and there can be no assurance that the Subsidiary PFIC would provide U.S. Holders the information necessary to make such an election. Thus, prospective investors are urged to consult their tax advisors regarding the consequences of the indirect acquisition, ownership and disposition of interests in Subsidiary PFICs.

Indirect Investments in CFCs—Subsidiary CFCs

A non-U.S. entity will be treated as a controlled foreign corporation (a "CFC") if it is treated as a corporation for U.S. federal income tax purposes and if more than 50% of (i) the total combined voting power of all classes of stock of the non-U.S. entity entitled to vote or (ii) the total value of the stock of such non-U.S. entity, is owned (actually or constructively) on any day during the taxable year of such non-U.S. entity by U.S. Shareholders. For these purposes, U.S. Shareholders are United States persons who own 10% or more of the total combined voting power of all classes of stock of the non-U.S. entity entitled to vote.

A U.S. Shareholder of a CFC is required to include in gross income each year its pro rata portion of the CFC's "Subpart F" income for the taxable year of the CFC that ends with or within such taxable year of the shareholder. Generally, Subpart F income includes passive income, such as interest, dividends and gains from assets that produce passive income (subject to certain exceptions). The aggregate Subpart F income inclusions in any taxable year relating to a particular CFC are limited to such entity's current earnings and profits. These inclusions are treated as ordinary income (whether or not such inclusions are attributable to net capital gain). In addition, gain realized on a sale of CFC stock is treated as ordinary dividend income to the extent of current and/or accumulated earnings and profits of the CFC. These rules apply regardless of whether the CFC is also a PIFC. If any of the subsidiaries held by the Delaware LP were treated as a CFC and the Delaware LP is treated as a U.S. Shareholder with respect to such subsidiary, we would be required to include in our calculation of our ordinary earnings for the taxable year the amount attributable to the Delaware LP's pro rata share of the Subpart F income associated with its investment in the CFC whether or not the CFC makes a distribution and any ordinary dividend income realized on the disposition of stock in such CFC, which will affect the amounts included in income by the U.S. Holders as QEF inclusions from us. In addition, the PFIC rules permitting the deferral of tax on undistributed earnings would not apply.

The rules applicable to such indirect investments in such non-U.S. entities are complex. Thus, prospective investors are urged to consult their tax advisors regarding the consequences of the indirect acquisition, ownership and disposition of interests in CFCs.

Filing of QEF Election, Timing of QEF Election

An eligible U.S. Holder may make a QEF election with respect to our company effective as of the beginning of its holding period by filing a copy of IRS Form 8621 on or before the due date (taking into account extensions) for the U.S. Holder's federal income tax return for the first taxable year in which the U.S. Holder holds Shares or RDSs. A QEF election, once validly made, will be effective for all subsequent taxable years of the U.S. Holder unless revoked with the consent of the IRS. A QEF election is available to a U.S. Holder only if we provide such U.S. Holder in each taxable year with a "PFIC Annual Information Statement" as described in the currently applicable U.S. Treasury regulations and with reasonable access to our books of account, records and other documents so as to enable the U.S. Holder to verify that its pro rata share of ordinary earnings and net capital gains has been calculated according to U.S. federal income tax principles.

We intend to provide each U.S. Holder that makes a QEF election with respect to our Shares or RDSs with a PFIC Annual Information Statement and with reasonable access to our books of account, records and other documents. We intend to provide the PFIC Annual Information Statement prior to the due date for a calendar-year U.S. Holder's federal income tax return, determined taking into account extensions. Since we do not expect to provide a PFIC Annual Information Statement on or before the due date for a calendar-year U.S. Holder's federal income tax return, determined without taking into account extensions, U.S. Holders should expect that they will have to request an extension of time to file such tax returns in order to make a timely QEF election with respect to our company. We cannot assure you that any Subsidiary PFIC will provide sufficient information to permit U.S. Holders, or any U.S. entity through which we have an indirect interest in such Subsidiary PFIC, to make a QEF election with respect to the Subsidiary PFIC.

Each U.S. Holder should consult its own tax adviser with respect to the tax consequences of making a QEF election with respect to our company and our direct or indirect investments in Subsidiary PFICs.

Distributions

Subject to the discussion below under "—No Qualified Electing Fund Election and No Mark-to-Market Election", each U.S. Holder generally will be required to include in gross income the amount of any distribution that we make on our Shares as a dividend to the extent of our current or accumulated earnings and profits (as determined for U.S. federal income tax purposes), other than earnings and profits that have previously been taxed to the U.S. Holder as described above under "—Qualified Electing Fund Election". To the extent the amount of any distribution exceeds our current and accumulated earnings and profits, it will be treated first as a non-taxable return of capital to the extent of the U.S. Holder's adjusted tax basis in its Shares or RDSs and, to the extent the amount of such distribution exceeds such adjusted tax basis, will be treated as gain from the sale or exchange of the Shares or RDSs. Each U.S. Holder should consult its own tax advisor with respect to the appropriate U.S. federal income tax treatment of any distribution on our Shares or RDSs.

Distributions on our Shares or RDSs that are treated as dividends generally will constitute income from sources outside the United States. However, such dividends may be treated for U.S. foreign tax credit purposes as income from sources outside the United States to the extent attributable to our non-U.S. source earnings and profits, and as income from sources within the United States to the extent attributable to our U.S. source earnings and profits if we are treated as a United-States-owned foreign corporation, as described above under "Qualified Electing Fund Election". Distributions on our Shares or RDSs that are treated as dividends will be categorized for U.S. foreign tax credit purposes as "passive category income," or, in the case of some U.S. Holders, as "general category income". Such dividends will not be eligible for the "dividends received" deduction generally allowed to corporate shareholders with respect to dividends received from U.S. corporations or for the reduced tax rate applicable to "qualified dividend income" of non-corporate taxpayers.

Sale, Exchange or Other Disposition of Shares or RDSs

Subject to the discussion below under "—No Qualified Electing Fund Election and No Mark-to-Market Election", a U.S. Holder in a PFIC generally will recognize gain or loss for U.S. federal income tax purposes upon the sale, exchange or other disposition of Shares or RDSs in an amount equal to the difference, if any, between the amount realized on the sale, exchange or other disposition and the U.S. Holder's adjusted tax basis in the Shares or RDSs. Any such gain or loss generally will be treated as capital gain or loss. The deductibility of capital losses is subject to limitations. Such gain or loss generally will be sourced within the United States for U.S. foreign tax credit purposes.

Mark-To-Market Election

If our Shares are considered "marketable stock", a U.S. Holder generally may elect to make a "mark-to-market election" in respect of its Shares, in lieu of making a QEF election. Generally, our Shares will be considered marketable stock if they are "regularly traded" on a "qualified exchange" within the meaning of applicable U.S. Treasury regulations. A class of shares is regularly traded during any calendar year during which more than *de minimis* quantities of such class of shares is traded, on at least 15 days during each calendar quarter. A non-U.S. securities exchange constitutes a qualified exchange if it is regulated or supervised by a governmental authority of the country in which the securities exchange is located and meets certain trading, listing, financial disclosure and other requirements set forth in U.S. Treasury regulations. It is not clear whether our Shares will constitute marketable stock for this purpose. Assuming the RDSs are regularly traded on a qualified exchange for this purpose, U.S. Holders that own such RDSs will generally be eligible to make a mark-to-market election in respect of their investment. However, there can be no assurance that trading volumes will be sufficient to permit a mark-to-market election. Thus, prospective investors are urged to consult their tax advisors regarding the feasibility of making a mark-to-market election.

If a "mark-to-market" election is available and a U.S. Holder validly makes such an election as of the beginning of the U.S. Holder's holding period, the U.S. Holder generally will not be subject to the adverse tax consequences described below under "—No Qualified Electing Fund Election and No Mark-to-Market Election". Instead, the U.S. Holder generally will be required to take into account the difference, if any, between the fair market value of, and its adjusted tax basis in, its Shares at the end of each taxable year as ordinary income or, to the extent of any net mark-to-market gains previously included in income, ordinary loss, and to make corresponding adjustments to the tax basis of its Shares. In addition, any gain from a sale, exchange or other disposition of Shares will be treated as ordinary income, and any loss will be treated as ordinary loss to the extent of any net mark-to-market gains previously included in income. It is not entirely clear how the tax consequences of a mark-to-mark election with respect to our Shares would apply with respect to our interest in a Subsidiary PFIC.

If a deceased U.S. Holder had made a mark-to-market election for our Shares effective as of the beginning of his or her holding period, a person who acquires Shares from the deceased U.S. Holder generally will be denied the step-up of the tax basis for U.S. federal income tax purposes to the fair market value at the date of the U.S. Holder's death, which would otherwise be available with respect to a decedent dying in any year other than 2010. Instead, the acquirer will have a tax basis equal to the lower of the fair market value of the Shares and the deceased U.S. Holder's tax basis.

Each U.S. Holder should consult its own tax adviser with respect to the availability and tax consequences of a mark-to-market election with respect to our Shares.

No Qualified Electing Fund Election and No Mark-to-Market Election

If a U.S. Holder does not validly make a QEF election or mark-to-market election, effective as of the beginning of its holding period, with respect to our company, the U.S. Holder will be subject to special rules with respect to any "excess distribution" made by us. An "excess distribution" is generally the excess of (i) all distributions to the U.S. Holder on its Shares or RDSs during such taxable year over (ii) 125 percent of the average annual distributions to the U.S. Holder on such Shares or RDSs during the preceding three taxable years (or shorter period during which the U.S. Holder held such Shares or RDSs). The tax payable by a U.S. Holder on an excess distribution with respect to our Shares or RDSs will be determined

by allocating such excess distribution ratably to each day of the U.S. Holder's holding period for such Shares or RDSs. The amount of excess distribution allocated to the taxable year of such distribution will be included as ordinary income for the taxable year of such distribution. The amount of excess distribution allocated to any other period included in the U.S. Holder's holding period cannot be offset by any net operating losses of the U.S. Holder and will be taxed at the highest marginal rates applicable to ordinary income for each such period and, in addition, an interest charge will be imposed on the amount of tax for each such period. Furthermore, the amount of an excess distribution not includable in income in the taxable year of such distribution will not be included in determining the amount of the excess distribution for any subsequent taxable year.

If a U.S. Holder does not validly make a QEF election or a mark-to-market election effective as of the beginning of its holding period in respect of our Shares or RDSs, any gain in respect of our Shares or RDSs (including, without limitation, gain with respect to certain transfers upon death, gifts and pledges) generally will be treated as an excess distribution subject to the tax consequences relating to an excess distribution described above.

If a deceased U.S. Holder had not made a QEF election for Shares or RDSs effective as of the beginning of his or her holding period, a person who acquires Shares or RDSs from the deceased U.S. Holder generally will be denied the step-up of the tax basis for U.S. federal income tax purposes to the fair market value at the date of the U.S. Holder's death, which would otherwise be available with respect to a decedent dying in any year other than 2010. Instead, the acquirer will have a tax basis equal to the lower of the fair market value of the Shares or RDSs and the deceased U.S. Holder's tax basis.

If no QEF election is made for a Subsidiary PFIC, the rules described above with respect to excess distributions generally will apply to direct and indirect dispositions of our interest in the Subsidiary PFIC (including a disposition by a U.S. Holder of our Shares or RDSs) and excess distributions by the Subsidiary PFIC. It is not entirely clear how the consequences relating to the tax basis upon death described above would apply with respect to our interest in a Subsidiary PFIC.

Backup Withholding Tax and Information Reporting Requirements

Under certain circumstances, U.S. backup withholding tax and/or information reporting may apply to U.S. Holders with respect to payments made on, or proceeds from the sale, exchange or other disposition of, Shares or RDSs, unless an applicable exemption is satisfied. U.S. Holders that are corporations generally are excluded from these information reporting and backup withholding tax rules. Any amounts withheld under the backup withholding tax rules will be allowed as a credit against a U.S. Holder's U.S. federal income tax liability, if any, or will be refunded, if such U.S. Holder furnishes required information to the IRS.

In addition, a U.S. Holder that purchased our Shares or RDSs for cash in the global offering or made a payment to us of any subsequent installment due with respect to our Shares or RDSs will generally be required to report the purchase on Form 926 if the amount of cash transferred to us by such U.S. Holder during the 12-month period ending on the date of the transfer exceeds $100,000. A U.S. Holder that fails to comply with this reporting obligation may be subject to substantial penalties.

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