



<b>B #:</b>	2243-14
<b>Date:</b>	November 20, 2014
<b>To:</b>	All Participants
<b>Category:</b>	Dividends
<b>From:</b>	International Services
<b>Attention:</b>	Operations, Reorg & Dividend Managers, Partners & Cashiers
<b>Subject:</b>	<u>Tax Relief</u> : Country: Canada <b>Chemtrade Logistics Income Fund</b> <u>CUSIP</u> : 16387P103 <u>Record Date</u> : 10/31/2014   <u>Payable Date</u> : 11/28/2014 <u>Subject to Sift Tax EDS CO</u> : 11/25/2014 8:00 PM (EST) <u>Not Subject to Sift Tax EDS CO</u> : 11/25/2014 7:59 PM (EST)

**\*\*\*\*\*Important Information - Please Read\*\*\*\*\***

The distribution by Chemtrade Logistics Income Fund (“Chemtrade”) has been classified as having two components that require DTC to run two TaxReliefSM events.

1. **\$0.029684** - Chemtrade Distributions **Subject to the SIFT Tax** processed under the normal Foreign Tax Withholdings function, announced as (0 - 09, 35, 37)
2. **\$0.070316** - Chemtrade Distributions **Not Subject to SIFT Tax** processed under Foreign Tax Withholdings function, announced as (F - 09, 35, 37)

See below for TaxRelief requirements and eligibility prior to making an EDS tax election.

## **1. Chemtrade Distributions Subject to SIFT Tax**

As stated in its Short Form Prospectus, dated January 26<sup>th</sup>, 2014, which can be found at [www.sedar.com](http://www.sedar.com), Chemtrade is a specified investment flow through ("SIFT") trust for Canadian income tax purposes. Where Chemtrade is subject to taxation under the SIFT Rules with respect to certain distributions, non-Resident Holders who receive distributions that are subject to this tax will be deemed to have received a dividend from a taxable Canadian corporation.

Clients are urged to refer to Canada TaxInfo for information regarding eligibility for making EDS tax elections.

## **2. Chemtrade Distributions Not Subject to SIFT Tax**

Any amount paid or credited by Chemtrade to a Non-Resident Holder out of the income of Chemtrade (other than income that has been subject to SIFT tax) will be subject to Canadian non-resident withholding tax at a rate of 25% as a trust distribution. Such withholding tax rate may be reduced under an applicable tax treaty.

### **UNITHOLDERS ELIGIBLE FOR THE EXEMPT RATE**

- A) Currently, the portion of the trust distributions not subject to SIFT tax are being derived from sources outside of Canada, and, consequently, exempt from Canadian withholding tax when made to any Unit holder who is:
- (i) a non-resident of Canada for tax purposes;
  - (ii) a "resident" of the United States for the purposes of the *Canada – United States Income Tax Treaty*; and
  - (iii) a "qualifying person" for the purposes of the Treaty, so as to be entitled to benefits thereunder, at a 0% rate.

Please refer to Canada TaxInfo for a definition of U.S. Residents.

***Participants making an election at the exempt rate for Unit holders whom meet these three requirements will be prompted to enter a Tax Exempt Control number which, for this distribution only, should be entered as 999999.***

B) Eligible Canadian Residents as defined in Canada TaxInfo

**UNITHOLDERS ELIGIBLE FOR THE FAVORABLE WITHHOLDING RATE**

Beneficial owners who are non-residents of the U.S. or Canada and who are residents eligible for treaty benefits in treaty jurisdictions where the applicable rates of Canadian withholding tax is 15% are eligible to elect and claim treaty benefits through the EDS program; in accordance with the guidelines of their jurisdiction. For a list of applicable rates for countries with which Canada has a tax convention, please refer to the Department of Finance Canada (DoF) website at the following address: [www.fin.gc.ca](http://www.fin.gc.ca). (Trust distributions are generally governed by the “Other Income” article of Canada’s bilateral tax treaties, or less commonly, by the “Estates and Trusts” article)

**UNFAVORABLE**

Participants who do not certify for the favorable or exempt rate will receive the payment at the 25% unfavorable withholding rate.

If there are any questions regarding this Important Notice or the processing of related instructions via EDS, participants should contact DTCC’s Customer Service Center at (888) 382-2721.

***Important Legal Information:** The Depository Trust Company (“DTC”) does not represent or warrant the accuracy, adequacy, timeliness, completeness or fitness for any particular purpose of the information contained in this communication, which is based in part on information obtained from third parties and not independently verified by DTC and which is provided as is. The information contained in this communication is not intended to be a substitute for obtaining tax advice from an appropriate professional advisor. In providing this communication, DTC shall not be liable for (1) any loss resulting directly or indirectly from mistakes, errors, omissions, interruptions, delays or defects in such communication, unless caused directly by gross negligence or willful misconduct on the part of DTC, and (2) any special, consequential, exemplary, incidental or punitive damages.*

*To ensure compliance with Internal Revenue Service Circular 230, you are hereby notified that: (a) any discussion of federal tax issues contained or referred to herein is not intended or written to be used, and cannot be used, for the purpose of avoiding penalties that may be imposed under the Internal Revenue Code; and (b) as a matter of policy, DTC does not provide tax, legal or accounting advice and accordingly, you should consult your own tax, legal and accounting advisor before engaging in any transaction.*