



<b>B #:</b>	0795-14
<b>Date:</b>	May 22, 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>	Tax Relief: Country: Canada Chemtrade Logistics Income Fund: Cusip: 16387P103 Record Date: 04/30/14 Payable Date: 05/30/14 EDS Cutoff Date: 05/23/2014 8:00 PM EST

**\*\*\*\*\*Time Critical\*\*\*\*\***

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

1. \$0.029914 Chemtrade Distributions Subject to the SIFT Tax processed under the normal Foreign Tax Withholdings function, announced as (0 - 09,35,37)
2. \$0.070085 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.

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Non-Confidential

## **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.