

CRA REQUIREMENTS

> For Non-Canadian Resident Investors

FACTSHEET

In December 2011, the CRA announced an extension of the transition period for the new NR administration policy to December 31, 2012, along with some new notes regarding the procedures payors should follow during this transition period. Payors may continue to apply treaty rates to payees (individuals, corporations, trusts) during the transition period without obtaining a completed NR form, unless the payee is:

- > An agent or nominee (other than a Swiss agent or nominee)
- > The payee is recorded as being in 'care of' or 'in trust for' another person
- > The payee has a post office box address
- > The payee has a dividend/interest mailing address with a different country than the permanent address on record
- > The payee is a flow through entity such as a partnership, a limited liability company or collective investment vehicles
- > There is reason to believe that a reduced tax rate will not apply to a payee due to limitation of benefits provisions in the Canada - US tax treaty

CRA's extension means that for 2012 we can continue to apply treaty rates to non-resident individuals, trusts and companies without such payees having provided an NR form, provided they are not included in one of the categories above.

While we will not be applying the maximum withholding on those payees not included in one of the above categories during 2012, we will continue to solicit NR forms from all impacted registered holders in advance of the end of the transition period of December 31, 2012.

Should you have any questions, we advise you to discuss this matter with your tax department or visit the CRA website at <http://www.cra-arc.gc.ca/menu-eng.html>.

Specific information about the transition period may be found at <http://www.cra-arc.gc.ca/formspubs/frms/ic76-12r6-eng.html>.