



About U.S. withholding tax rates (You and your mean the authorized person signing this document on behalf of the entity)

Canadian entities that invest in U.S. securities may qualify for a lower withholding tax rate on the income they earn from those securities under The Canada-U.S. Income Tax Convention 1980, as amended by the Protocols signed on June 14, 1983, March 28, 1984, March 17, 1995, July 29, 1997 and September 21, 2007 ("the Treaty").

This document includes a brief explanation of the relevant Treaty provisions pertaining to qualifying entities. It includes general information only, and is not intended to provide legal or tax advice. We recommend you seek legal and tax advice in respect of the entity's specific circumstances.

Please complete and sign the certification below, if the entity intends to claim the lower withholding tax rates under the Treaty.

Entities that qualify for the lower tax rate

An entity qualifies for the lower tax rate if it is considered a qualifying person as defined in the Limitation on Benefits Article, in Section XXIX-A of the Treaty (http://www.fin.gc.ca/treaties-conventions/usa_-eng.asp).

Check one of the benefit provisions that apply to the entity under Canada-U.S. Tax Convention (See Appendix):

- Checkboxes for various benefit provisions: Estate, Tax exempt pension trust or pension fund, Other tax exempt organization, Publicly traded corporation, Subsidiary of a publicly traded corporation, Company that meets the ownership and base erosion test, Trust that meets the ownership and base erosion test (Article XXIX-A, 2(e)(i)), Company that meets the derivative benefits test, Company with an item of income that meets active trade or business test, Other (specify paragraph from Article XXIX-(A)).

About the Entity

Entity name

Blank line for entity name

CIBC Investor Services Accounts this document applies to

Grid of six account number input fields

Acknowledgments

When you sign below, you certify that the entity is a resident of Canada within the meaning of the Treaty and that it:

- meets all provisions of the Treaty that are necessary to claim a reduced rate of withholding, including the limitation on benefits provisions
derives the income (within the meaning of Section 894 of the United States Internal Revenue Code, and the regulations thereunder), as the beneficial owner.

Please sign here

Signature lines for Date (mm/dd/yyyy), Authorized Person Name, and Authorized Person Signature (with an X mark)

Appendix:

Qualifying Persons Under Limitation on benefits Tax Treaty Provisions

Each of the tests is summarized below for your convenience, but may not be relied upon for making a final determination that the entity is a Qualifying Person for the purpose of the Limitation on Benefits rules. Rather, you must check the text of the Limitation on Benefits article itself, to determine which tests are available under the Treaty and the particular requirements of those tests. See Table 4, Limitation on Benefits, at www.irs.gov/Individuals/International-Taxpayers/Tax-Treaty-Tables, for a summary of the major tests within the Limitation on Benefits article that are relevant for documenting any entity's claim for Treaty benefits. See also the Canada-US Tax Treaty: <https://www.irs.gov/pub/irs-trty/canada.pdf> and the 2007 Canada-US Tax Treaty Protocol: <https://www.treasury.gov/resource-center/tax-policy/treaties/Documents/Treaty-Protocol-Canada-9-21-2007.pdf>.

- 1. *Estate.*** This test is met if the entity is an Estate domiciled in Canada, not including a Testamentary Trust.
- 2. *Tax-exempt pension trust or pension fund.*** This test generally requires that more than half the beneficiaries or participants in the trust or fund be residents of the country of residence of the trust or fund itself.
- 3. *Other tax-exempt organization.*** This test generally requires that more than half the beneficiaries, members, or participants of religious, charitable, scientific, artistic, cultural, or educational organizations be residents of the country of residence of the organization.
- 4. *Publicly-traded corporation.*** This test generally requires the corporation's principal class of shares to be primarily and regularly traded on a recognized stock exchange.
- 5. *Subsidiary of publicly-traded corporation.*** This test generally requires that more than 50% of the vote and value of the company's shares be owned, directly or indirectly, by five or fewer companies that meet the publicly-traded corporation test, as long as all companies in the chain of ownership are resident in either the U.S. or Canada.
- 6. *Company that meets the ownership and base erosion test.*** This test generally requires that more than 50% of the vote and value of the company's shares be owned, directly or indirectly, by Qualifying Persons, as long as all companies in the chain of ownership are resident in the same country of residence, and less than 50% of the company's gross income is accrued or paid, directly or indirectly, to persons other than Qualifying Persons.
- 7. *Trust that meets the ownership and base erosion test.*** This test generally requires that at least 50% of the trust's assets be beneficially owned, directly or indirectly, by persons resident in Canada, and less than 50% of the trust's gross income is accrued or paid, directly or indirectly, to persons who are not Qualifying Persons.
- 8. *Company that meets the derivative benefits test.*** This test generally requires that more than 90% of the aggregate vote and value of the company's shares be owned, directly or indirectly by Qualifying Persons or persons who are entitled to identical benefits under their country's own Treaty with the U.S. In addition, this test requires that less than 50% of the company's gross income be paid or accrued, directly or indirectly, to persons who would not be Qualifying Persons.
- 9. *Company with an item of income that meets the active trade or business test.*** This test generally requires that the company be engaged in an active trade or business in its country of residence and that its activities in that country be substantial in relation to its U.S. activities.
- 10. *Other.*** For other Limitation on Benefits tests that are not listed above, identify the other test relied upon. For example, if you meet the not-for-profit test under the Canada-U.S. Income Tax Treaty, you should write "Not for Profit, Article 2(g)" in the space provided.