

2023 TAX INFORMATION

The following information is intended to assist Canadian resident unitholders of Chemtrade Logistics Income Fund (the “Fund”) in the preparation of their 2023 income tax returns. All taxable Canadian unitholders should receive a T3 Supplementary tax slip prior to March 31, 2024 from their financial institution.

The Fund paid both cash and non-cash distributions in 2023. The cash distribution was paid on the Fund’s outstanding units (the “Units”) on the record date. The non-cash distribution in the form of Units was paid under the terms of the Distribution Reinvestment Plan (“DRIP”)¹.

Pursuant to the terms of the DRIP, eligible Unitholders may elect to reinvest all or a portion of their regular monthly distributions in additional trust units of the Fund. Participants of the DRIP will receive a “bonus” distribution of Units equal to 3% of the amount of the cash distribution reinvested.

The following table summarizes the cash distributions per unit of the Fund for 2023 and the treatment of the distributions for Income Tax purposes.

Cash and regular distribution:

2023	Other Income		Dividends Other than Eligible Dividend		Foreign Non- Business Income		Total	
	\$0.03924	6.53963%	\$0.14544	24.24623%	\$0.41532	69.21414%	\$0.60000	100%

The following table summarizes the non-cash “bonus” distributions per unit of the Fund for 2023 and the treatment of the distributions for Income Tax purposes.

The “bonus” non-cash distribution under the terms of DRIP:

2023	Return of capital		Total	
	\$0.01800	100%	\$0.01800	100%

For individuals who held units for only part of the year, the allocation of distributions received can be determined by multiplying the distributions received by the 2023 Monthly Treatment of Distribution for Income Tax Purposes.

Generally, the income will not be subject to tax where units are held in a trust governed by a RRSP, a RRIF, a DPSP, a RDSP, a TFSA, a RESP or a FHSA (all as defined for Canadian tax purposes) in which case no income should be reported by the beneficiary of such trust.

Adjusted Cost Base (ACB)

¹ The Fund announced on January 15, 2024 that it has suspended the DRIP effective with the distribution declared in January 2024 and payable in February 2024 at which time all distributions of the Fund will be paid only in cash.

Canadian Unitholders are required to reduce the ACB of their units by any distributions received in the form of a return of capital. The ACB is used in calculating capital gains or losses on the disposition of the units. No portion of the 2023 cash distribution is a return of capital. DRIP participants who received “bonus” non-cash distribution should adjust their ACB per unit by the return of capital.

Non-Canadian Unitholders

Non-Canadian unitholders should consult their tax advisors to determine how to report their share of income from the Fund for the year.

The Fund is a limited purpose trust established under the laws of the Province of Ontario and governed by the Declaration of Trust. For purposes of the *Income Tax Act* (Canada) (the “**Tax Act**”), the Fund is a mutual fund trust and a Specified Investment Flow-Through trust.

In order for the Fund to maintain its status as a mutual fund trust under the Tax Act, the Fund must not be established nor maintained primarily for the benefit of non-residents of Canada within the meaning of the Tax Act. Accordingly, the Declaration of Trust provides that at no time may non-residents of Canada be the beneficial owners of a majority of the Units. The Declaration of Trust contains provisions that address the threat or occurrence of this situation.

Taxation of Distributions to U.S. Resident Unitholders

The Fund has made an election to be treated as an association taxed as a corporation for U.S. federal income tax purposes.

A non-U.S. corporation, such as the Fund, would be a passive foreign investment company (“**PFIC**”) within the meaning of Section 1297 of the Internal Revenue Code if, during any taxable year, (a) 75% or more of its gross income consists of certain types of passive income (“**Income Test**”), or (b) the average value of its passive assets (generally assets that generate passive income) is 50% or more of the average value of all of its assets (“**Assets Test**”). Passive income includes, for example, dividends, interest, certain rents and royalties, certain gains from the sale of stock and securities, and certain gains from commodities transactions. For purposes of the PFIC Income Test and Assets Test described above, if a corporation owns, directly or indirectly, 25% or more of the total value of the outstanding shares of another corporation, the first corporation will be treated as if it (a) held a proportionate share of the assets of such other corporation and (b) received directly a proportionate share of the income of such other corporation.

Based on the Fund’s current and projected income and the valuation of its assets, the Fund does not believe that it was a PFIC in 2023 and it does not anticipate becoming a PFIC in 2024. The Fund’s determination that it is not, and that it does not expect to become a PFIC, is based on the belief that the Fund and its direct and indirect subsidiaries earn primarily active business income and that the assets of its direct and indirect subsidiaries generate primarily active business income. Since PFIC status is a fact-intensive determination made on an annual basis, no assurance can be given that the Fund is not or will not become classified as a PFIC.

