

## 2019 TAX INFORMATION

The following information is intended to assist Canadian resident unitholders of Chemtrade Logistics Income Fund (the “**Fund**”) in the preparation of their 2019 income tax returns. All taxable Canadian unitholders should receive a T3 Supplementary tax slip prior to March 31, 2020 from their financial institution.

The following table summarizes the cash distributions per unit of the Fund for 2019 and the treatment of the distributions for Income Tax purposes.

2019	Other Income		Dividends Other than Eligible Dividend		Foreign Non- Business Income		Total	
	\$0.15852	13.21%	\$0.49769	41.47%	\$0.54379	45.32%	\$1.200	100.00%

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 2019 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 or RESP in which case no income should be reported by the beneficiary of such trust.

### **Adjusted Cost Base (ACB)**

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 2019 distribution is a 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 effective January 15, 2014.

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 2019 and it does not anticipate becoming a PFIC in 2020. 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.

**THE ABOVE INFORMATION IS OF A GENERAL NATURE ONLY AND DOES NOT ADDRESS ALL POSSIBLE U.S. FEDERAL, STATE, OR LOCAL INCOME TAX CONSIDERATIONS AND IS NOT INTENDED TO PROVIDE LEGAL OR TAX ADVICE TO ANY PARTICULAR UNITHOLDER OR POTENTIAL UNITHOLDER OF THE FUND. NON-CANADIAN UNITHOLDERS AND U.S. RESIDENT UNITHOLDERS SHOULD CONSULT THEIR OWN TAX ADVISORS REGARDING THE TAX CONSEQUENCES OF HOLDING UNITS AND REPORTING INCOME EARNED AND TAX WITHHELD FROM DISTRIBUTIONS.**

## 2019 Monthly Treatment of Distribution for Income Tax Purposes

Date of		Other Income		Non Eligible Dividend		Foreign Non-Business Income		Total	
Record	Payment	\$/unit	%	\$/unit	%	\$/unit	%	\$/unit	%
31-Jan-19	28-Feb-19	0.01321	13.21%	0.04147	41.47%	0.04532	45.32%	0.10000	100.00%
28-Feb-19	29-Mar-19	0.01321	13.21%	0.04147	41.47%	0.04532	45.32%	0.10000	100.00%
29-Mar-19	30-Apr-19	0.01321	13.21%	0.04147	41.47%	0.04532	45.32%	0.10000	100.00%
30-Apr-19	31-May-19	0.01321	13.21%	0.04147	41.47%	0.04532	45.32%	0.10000	100.00%
31-May-19	28-Jun-19	0.01321	13.21%	0.04147	41.47%	0.04532	45.32%	0.10000	100.00%
28-Jun-19	31-Jul-19	0.01321	13.21%	0.04147	41.47%	0.04532	45.32%	0.10000	100.00%
31-Jul-19	30-Aug-19	0.01321	13.21%	0.04147	41.47%	0.04532	45.32%	0.10000	100.00%
30-Aug-19	30-Sep-19	0.01321	13.21%	0.04147	41.47%	0.04532	45.32%	0.10000	100.00%
30-Sep-19	31-Oct-19	0.01321	13.21%	0.04147	41.47%	0.04532	45.32%	0.10000	100.00%
31-Oct-19	29-Nov-19	0.01321	13.21%	0.04147	41.47%	0.04532	45.32%	0.10000	100.00%
29-Nov-19	31-Dec-19	0.01321	13.21%	0.04147	41.47%	0.04532	45.32%	0.10000	100.00%
31-Dec-19	31-Jan-20	0.01321	13.21%	0.04147	41.47%	0.04532	45.32%	0.10000	100.00%
<b>Total</b>		<b>0.15852</b>	<b>13.21%</b>	<b>0.49769</b>	<b>41.47%</b>	<b>0.54379</b>	<b>45.32%</b>	<b>1.20000</b>	<b>100.00%</b>