

Partners Value Investments LP (“New PVI LP”)

2023 Plan of Arrangement – Tax Election

- Canadian unitholders (who are not tax exempt) who wish to defer the built-in capital gain on their Partnership units must file a joint tax election with the general partner of New PVI LP under subsection 97(2) of the Income Tax Act.
- The tax election should be filed in respect of the step in the Arrangement in which, after the liquidation of the Partnership, unitholders transferred shares of Newco to New PVI LP in exchange for equity units, Preferred Notes and/or preferred units, and Extraction Notes.
- If you would like to file the tax election, please contact us at the following email address as soon as possible and an information request will be sent to you:
pvitaxelection@brookfield.com
- The tax election forms will be prepared by PWC and emailed to you. You will be required to print, sign and mail the tax election to the Canada Revenue Agency based on the instructions provided. The deadline for filing the election is on or before February 23, 2024.