



1.1446(f)-4(b)(3)(iii) 92 Day Qualified Notice

Partnership: Partners Value Investments LP

Unit Class: All Classes

CUSIP #s: 70214T101, 70214T119

Qualified Notice Posting Date: December 21, 2022

As of the date of this Notice (the “Qualified Notice Posting Date”), the “10-Percent Exception” under Treasury Regulations Section 1.1446(f)-4(b)(3)(ii) applies to the transfer of Partners Value Investments LP (“PVI LP”) units. Accordingly, withholding under Treasury Regulations Section 1.1446(f)-4 is not required on the transfer of PVI LP units during the applicable period.

Please note that PVI LP qualifies for the “10-Percent Exception” because it has not been (and does not expect to be) engaged in a U.S. trade or business within the meaning of Treas. Reg. Sec. 1.1446(f)- 4(b)(3)(ii)(A)(2). Furthermore, PVI LP intends to issue qualified notices in accordance with Treas. Reg. Sec. 1.1446(f)-4(b)(3)(iii) as applicable.