



## MEMORANDUM

TO : ALL DEALER'S REPRESENTATIVES  
FROM : THE MANAGEMENT  
DATE : 14 NOVEMBER 2022  
RE : NEW WITHHOLDING TAX ON US PUBLICLY TRADING PARTNERSHIPS (PTP)  
SECURITIES

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The U.S. Internal Revenue Service (IRS) has issued a new provision under Section 1446(f) of the Internal Revenue Code (IRC) that primarily impacts Non-U.S. Residents who invest in PTP Securities. Unless an exception applies, a **10% withholding tax** applies to

**1) Gross proceeds from the sale of a PTP and**

**2) Certain PTP distributions**

This new withholding tax will be applied on trades of PTP Securities with effect from 1 January 2023. The above withholding tax is over and above the existing withholding tax of 37% on PTP distributions.

Please note that with effect from 1 January 2023, there may be an additional 10% withholding tax applied on gross consideration on sales of PTP securities to you as per IRC Section 1446(f). If you are holding any PTP securities, we suggest that you review your clients' investment portfolio and take appropriate actions to avoid the possible impact of holding such securities from 1 January 2023.

Please refer to the attached possible list of PTP securities obtained from external sources. Kindly note that it is not an exhaustive list of all PTP securities that are in scope for Section 1446(f). The list may be subject to change from time to time without prior notice. TA Securities Holdings Berhad (TASH) assumes no responsibility for the timeliness, accuracy and completeness of this list. If the sale of security (from 1 January 2023 onwards) is not listed in the provided PTP list but falls under PTP classification, TASH reserves the right to claim the withholding tax from you to satisfy IRS withholding requirements.

Thank you.

**Disclaimer**

TASH does not provide any advice and is not liable for any loss or liabilities arising from the use of the information, including the links and files in this announcement.

*\*This list is for reference only and is not an exhaustive list of all PTP securities that are in scope for Section 1446(f). It may be subjected to changes from time to time without prior notice. TASH assume no responsibility for the timeliness, accuracy and completeness of this list.*

<b>ISIN</b>	<b>NAME</b>
US01881G1067	ALLIANCEBERNSTEIN HLDG LP UNIT
US74347W3530	PROSHARES TR II ULTRA SILVER NEW
US01877R1086	ALLIANCE RESOURCE PARTNERS LP
US02364V2060	AMERICA FIRST MULTIFAMILY IN
US26923H2004	ETF MANAGERS GROUP COMMODITY TR I
BMG162581083	BROOKFIELD RENEWABLE PARTNERS
US09625U2087	BLUEKNIGHT ENERGY PARTNERS L P L L C SERIES A PREFERRED UNITS
US91167Q1004	UNITED STATES BRENT OIL FUND LP
US74347Y8701	PROSHARES TR II ULTA BLOOMBERG NAT
US09225M1018	BLACK STONE MINERALS LP COM UNIT
US88166A4094	TEUCRIUM SUGAR FUND
US22758A1051	CROSSAMERICA PARTNERS LP COMMON UNITS REPSNTNG LIMITED PARTNER INTERESTS
US12637A1034	CSI COMPRESSCO LP COM UNIT
US2263442087	CRESTWOOD EQUITY PARTNERS LP UNIT
US2263443077	CRESTWOOD EQUITY PARTNERS LP PREFERRED UNITS REPRESENTING LTD PARTNER INTERE
US1651851099	CHESAPEAKE GRANITE WASH TRUST
US1314761032	CALUMET SPECIALTY PRODS PARTNERS L P COMMON UNITS REPSTG LTD PARTNER INT
US88166A1025	TEUCRIUM CORN FUND
US9117181043	UNITED STATES COPPER INDEX FD ETF
US16411Q1013	CHENIERE ENERGY PARTNERS LP
US46140H1068	INVESCO DB MULTI SECTOR COMMODITY TRUST INVESCO DB AGRICULTURE FUND

<b>ISIN</b>	<b>NAME</b>
US46140H7008	INVESCO DB MULTI SECTOR COMMODITY TRUST INVESCO DB BASE METALS FUND
US46138B1035	INVESCO DB COMMODITY INDEX TRACKING FD UNIT
US46140H3049	INVESCO DB MULTI SECTOR COMMODITY TRUST INVESCO DB ENERGY FUND
US46140H4039	INVESCO DB MULTI SECTOR COMMODITY TRUST INVESCO DB OIL FUND
US46140H5028	INVESCO DB MULTI SECTOR COMMODITY TRUST INVESCO DB PRECIOUS METALS FUND
US46140H2058	INVESCO DB MULTI-SECTOR COMMODITY TRUST INVESCO DB SILVER FUND
US46139B1026	INVESCO DB G10 CURRENCY HARVEST FUND INVESCO DB G10 CURRENCY HARVEST FUND
US23311P1003	DCP MIDSTREAM, LP
US23311P2092	DCP MIDSTREAM LP 7.875% RED PERP CUM PFD UNIT SER B FIXED/FLTG SHS
US23311P3082	DCP MIDSTREAM LP 7.95% SERS C FXD TO FLTNG RATE CUM REDMBLE PRPTUAL PREF UNITS
US46140H6018	INVESCO DB MULTI SECTOR COMMODITY TRUST INVESCO DB GOLD FUND
US24664T1034	DELEK LOGISTICS PARTNERS LP
US25820R1059	DORCHESTER MINERALS LP COM UNITS
US26827L1098	ECA MARCELLUS TRUST I
US2937921078	ENTERPRISE PRODS PARTNERS LP COM
US2921021000	EMPIRE STATE REALTY OP L P SER ES OPERATING PARTNERSHIP UNITS REP LTD PARTNERSHI
US29273V1008	ENERGY TRANSFER, L.P.
US29273V4077	ENERGY TRANSFER LP 7.375% SRS C FXD TO FLTNG RATE CMLTV RDMBL PERPETUAL PREF UNT
US29273V5066	ENERGY TRANSFER LP 7.625% SRS D FXD TO FLTNG RT CMLTV RDMBL PERPETUAL PREF UNT
US29273V6056	ENERGY TRANSFER LP 7.600% SRS E FXD TO FLTNG RT CMLTV RDMBL PERPETUAL PREF UNT
US74347W8828	PROSHARES ULTRASHORT EURO
US2921023089	EMPIRE STATE REALTY OP L P SER 250 OPERATING PARTNERSHIP UNITS REP LTD PARTNERSH
US34960P1012	FORTRESS TRANSPORTATION AND INFRASTRUCTURE INVESTORS LLC

<b>ISIN</b>	<b>NAME</b>
US34960P2002	FORTRESS TRANSPORTATION AND INFRASTRUCTURE INVESTORS LLC 8.25% FXDTFLTNG RT SRS
US34960P3091	FORTRESS TRANSPORTATION AND INFRASTRUCTURE INVESTORS LLC 8.00% FXD TO FLTNG SRS
US34960P4081	FORTRESS TRANSPORTATION AND INFRASTRUCTURE INVS LLC CUM 8.25% FXD RT SRS C CMLTV
US1501851067	CEDAR FAIR L.P. DEPOSITARY UNIT
US37959R1032	GLOBAL INDEMNITY GROUP LLC CLASS A COMMON STOCK
US3719271047	GENESIS ENERGY LP UNITS LTD PARTNERSHIP INT
US74347W3951	PROSHARES TRUST
US37946R1095	GLOBAL PARTNERS LP COM UNIT REPSTG
US37946R2085	GLOBAL PARTNERS LP 9.75% SRS A FXD TO FLTNG RT CMLTV RDMBL PRPTL PRFRD UNTS
US37946R3075	GLOBAL PARTNERS LP 9.50% SRS B FXD RT CMLTV RDMBL PERPETUAL PREFERRED UNITS
US3932211069	GREEN PLAINS PARTNERS LP COM UNIT REPSTG LTD PARTNER INT
US46428R1077	ISHARES S&P GSCI COMMODITY-INDEXED
US4357631070	HOLLY ENERGY PARTNERS LP COM UNIT
US59140L1008	METAURUS EQUITY COMPONENT TRUST U S CUMULATIVE DIV FUND SERIES 2027 SHARES
US4511001012	ICAHN ENTERPRISES, L.P.
US74347Y8131	PROSHARES TR II ULTRASHORT
US74347Y8131	PROSHARES ULTRASHORT BLOOMBERG NATURAL GAS
BMG540501027	LAZARD LTD CL A
US51508J3068	LANDMARK INFRASTRUCTURE PARTNERS LP PERPETUAL PREFERRD UNITS SERIES B 7.90%
US51508J2078	LANDMARK INFRASTRUCTURE PARTNERS LP 8% RED PERP PFD UNIT SER A
US5733311055	MARTIN MIDSTREAM PARTNERS L P
US5590801065	MAGELLAN MIDSTREAM PARTNERS LP COM
US55336V1008	MPLX LP

<b>ISIN</b>	<b>NAME</b>
US6442061049	NEW ENGLAND REALTY ASSOCIATES LP-DEPOSITARY RCPT
US62913M1071	NGL ENERGY PARTNERS LP
US62913M2061	NGL ENERGY PARTNERS LP 9.00% CL B FXD TO FLTNG CMLTV RDMBL PRPTL PFRD UNTS
US62913M3051	NGL ENERGY PARTNERS LP 9.625% CL C FXD TO FLTNG CMLTV RDMBL PRPTL PFRD UNTS
US63900P6088	NATURAL RESOURCE PARTNERS LP COM
US67058H1023	NUSTAR ENERGY LP
US67058H2013	NUSTAR ENERGY LP 8.50% SERIES A FIXED TO FLOATING RATE CUM RED PFD UNIT
US67058H3003	NUSTAR ENERGY LP 7.625% SRS B FXD TO FLTNG RATE CUM RDMBL PRPTL PRFRRD UNITS
US67058H4092	NUSTAR ENERGY LP 9.00% SRS C FXD TO FLTNG RATE CUM RDMBL PRPTL PRFRRD UNITS
US6740013007	OAKTREE CAPITAL GROUP LLC 6.625% SERIES A PREFERRED UNITS
US6740014096	OAKTREE CAPITAL GROUP LLC 6.550 % SERIES B PREFERRED UNITS
US2921022099	EMPIRE STATE REALTY OP L P SER 60 OPERATING PARTNERSHIP UNITS REP LTD PARTNERSHI
US7265031051	PLAINS ALL AMERN PIPELINE LP
US69318Q1040	PBF LOGISTICS LP UNIT LTD PARTNERSHIP INT
US74347Y7976	PROSHARES TR II ULTRASHORT
US8226341019	SHELL MIDSTREAM PARTNERS LP UNIT
US1724641097	SISECAM RESOURCES LP
US1724641097	SISECAM RESOURCES LP
US8661424098	SUMMIT MIDSTREAM PARTNERS LP UNIT
US30053M1045	EVOLVE TRANSITION INFRASTRUC
US30053M1045	SANCHEZ MIDSTREAM PARTNERS LP
US88166A6073	TEUCRIUM SOYBEAN FUND
US8644821048	SUBURBAN PROPANE PARTNERS LP

<b>ISIN</b>	<b>NAME</b>
US85814R1077	STEEL PARTNERS HOLDINGS LP
US8493431089	SPRAGUE RESOURCES LP
US86765K1097	SUNOCO LP COM UNIT REPSTG LTD
US74347W1302	PROSHARES TR II SHORT VIX SHORT
US88166A7063	TEUCRIUM AGRICULTURAL FUND
US1266332055	CVR PARTNERS LP COM UNIT NEW
US74347Y8883	PROSHARES TRUST II ULTA BLOMBERG CRUD OIL
US46141D1046	INVESCO DB US DOLLAR INDEX TRUST INVESCO DB US DOLLAR INDEX BEARISH FUND
US91201T1025	UNITED STATES GASOLINE FUND LP ETF
US74347W6012	PORSHARES ULTRA GOLD
US74347W8745	PROSHARES ULTRA EURO
US9123183009	UNITED STS NAT GAS FD LP UNIT PAR
US91288X1090	UNITED STATES 12 MONTH NATUR
US90290N1090	USA COMPRESSION PARTNERS LP
US9117171069	UNITED STATES COMMODITY INDE
US9033181036	USD PARTNERS LP COM UNIT REPSTG
US91288V1035	UNITED STATES 12 MONTH OIL FUND
US91232N2071	UNITED STS OIL FD LP UNITS NEW
US46141D2036	INVESCO DB US DOLLAR INDEX TRUST INVESCO DB US DOLLAR INDEX BULLISH FUND
US74347Y8396	PROSHARES TR II ULTRA VIX SHORT
US74347W3381	PROSHARES TR II VIX MID-TERM
US74347Y8545	PROSHARES TR II VIX SHORT TERM
US88166A5083	TEUCRIUM WHEAT FUND

<b>ISIN</b>	<b>NAME</b>
US9586691035	WESTERN MIDSTREAM PARTNERS LP COM
US9604171036	WESTLAKE CHEM PARTNERS LP COM UNIT
US96108P1030	WESTMORELAND RESOURCE PARTNERS LP
US74347W2706	PROSHARES TR II ULTRA YEN NEW
US74347W5691	PROSHARES TRUST II
US74347Y8479	PROSHARES TR II ULTRA SHORT SILVER