

IRC 1446(f)-Partnership withholding on Sales and Non-Income Distributions

The following information is in regard to nonresident aliens (NRA) and foreign corporations not otherwise engaged in a US trade or business, being subject to US tax on gains on sales of interests in partnerships engaged in a US trade or business. Section 864(c)(8) treats gain on the sale of interests in those partnerships as effectively connected with the conduct of a US trade or business (ECI), and subject to tax in the hands of the non-US partners, to the extent the gain was allocable to the partnership's US business assets. Section 1446(f) provides rules for withholding, reporting, and paying tax upon the sale, exchange, or other disposition of certain interests in partnerships.

According to U.S. legislation under Internal Revenue Code (IRC) Section 1446(f), gross proceeds from sales of and certain distributions from Publicly Traded Partnerships ("PTP") will be subject to 10% withholding effective on January 1, 2023.

Exemptions from withholding may apply if a PTP publishes a "Qualified Notice" to indicate that the PTP has met the requirements of IRC Sec. 1446(f)-4(b)(3) to be exempt from withholding.

Withholding will be reported on the year-end Form 1042-S, Foreign Person's U.S. Source Income Subject to Withholding.

Additional information about IRC Sec. 1446(f) is available on the IRS website:
<http://www.irs.gov/individuals/international-taxpayers/partnership-withholding>

*** 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. Phillip Securities assume no responsibility for the timeliness, accuracy and completeness of this list**

Last Updated: 23 May 2023

Ticker	ISIN	NAME	Exemption Applies?	1446(f) Taxable Security
AB	US01881G1067	ALLIANCEBERNSTEIN HLDG LP UNIT	NO	Taxable
ACLLY	US00449R1095	ACCELLERON INDS LTD UNSPONSORED ADS MASTER LIMITED PARTNERSHIP	NO	Taxable
AEGBF	SE0014401121	AEGIRBIO AB SHARE AK MASTER LIMITED PARTNERSHIP	NO	Taxable
AGQ	US74347W3530	PROSHARES TR II ULTRA SILVER NEW	YES	Not Taxable
AHOTF	CA0266951064	AMERICAN HOTEL INCOME PROPER	YES	Not Taxable
AKPPS	US04071D1072	ARK7 PROPERTIES PLUS LLC MEMBERSHIP INT S MASTER LIMITED PARTNERSHIP	NO	Taxable
AKPXS	US04071D2062	ARK7 PROPERTIES PLUS LLC MEMBERSHIP INT S MASTER LIMITED PARTNERSHIP	NO	Taxable
ARLP	US01877R1086	ALLIANCE RESOURCE PARTNERS LP	NO	Taxable
ATAX	US02364V2060	AMERICA FIRST MULTIFAMILY IN	NO	Taxable
AZLCZ	US0548071028	AZTEC LAND & CATTLE LTD	NO	Taxable
BBU	BMG162341090	BROOKFIELD BUSINESS PARTNERS LP	YES	Not Taxable
BDRY	US26923H2004	ETF MANAGERS GROUP COMMODITY TR I	YES	Not Taxable
BEP	BMG162581083	BROOKFIELD RENEWABLE PARTNERS	YES	Not Taxable
BEPPRA	BMG162582313	BEPUCN 5 1/4 PERP	YES	Not Taxable
BIP	BMG162521014	BROOKFIELD INFRASTRUCTURE PA	YES	Not Taxable
BIP-B	BMG162522756	BROOKFIELD INFRASTRUCTUR	YES	Not Taxable
BIPPRA	USG162522670	BROOKFIELD RENEWABLE PARTNERS LP 5.25%	YES	Not Taxable
BITW	US0917491013	BITWISE 10 CRYPTO INDEX FUND	NO	Taxable
BNO	US91167Q1004	UNITED STATES BRENT OIL FUND LP	YES	Not Taxable
BOIL	US74347Y8701	PROSHARES TR II ULTA BLOOMBERG NAT	YES	Not Taxable
BPYPM	BMG1624R1079	BROOKFIELD PROP PFD LP	NO	Taxable
BPYPN	BMG162491648	BROOKFIELD PROPERTY PART 5.75% A PFD	NO	Taxable
BPYPO	BMG162491564	BROOKFIELD PROPERTY PART 6.375% A2 PFD	NO	Taxable
BPYPP	BMG162491499	BROOKFIELD PROPERTY PART	NO	Taxable
BSM	US09225M1018	BLACK STONE MINERALS LP COM UNIT	NO	Taxable
BVERS	US0747991075	BEAVER COAL LTD	NO	Taxable
CANE	US88166A4094	TEUCRIUM SUGAR FUND	YES	Not Taxable
CAPL	US22758A1051	CROSSAMERICA PARTNERS LP COMMON UNITS REPSNTNG LIMITED PARTNER INTERESTS	NO	Taxable
CCLP	US12637A1034	CSI COMPRESSCO LP COM UNIT	NO	Taxable
CEQP	US2263442087	CRESTWOOD EQUITY PARTNERS LP UNIT	NO	Taxable
CEQP-	US2263443077	CRESTWOOD EQUITY PARTNERS LP PREFERRED UNITS REPRESENTING LTD PARTNER INTERE	NO	Taxable
CHKR	US1651851099	CHESAPEAKE GRANITE WASH TRUST	NO	Taxable
CLMT	US1314761032	CALUMET SPECIALTY PRODS PARTNERS L P COMMON UNITS REPSTG LTD PARTNER INT	NO	Taxable
CODI	US20451Q1040	COMPASS DIVERSIFIED HOLDINGS	YES	Not Taxable
CORN	US88166A1025	TEUCRIUM CORN FUND	YES	Not Taxable
CPER	US9117181043	UNITED STATES COPPER INDEX FD ETF	YES	Not Taxable
CPLP	MHY110822068	CAPITAL PRODUCT PARTNERS LP	NO	Taxable
CQP	US16411Q1013	CHENIERE ENERGY PARTNERS LP	NO	Taxable
CRT	US22757R1095	Cross Timbers ROYALTY TRUST UNIT	NO	Taxable
CWPS	US2128491030	CONWEST PARTNERSHIP LP-UNITS	NO	Taxable
DBA	US46140H1068	INVESCO DB MULTI SECTOR COMMODITY TRUST INVESCO DB AGRICULTURE FUND	YES	Not Taxable
DBB	US46140H7008	INVESCO DB MULTI SECTOR COMMODITY TRUST INVESCO DB BASE METALS FUND	YES	Not Taxable
DBC	US46138B1035	INVESCO DB COMMODITY INDEX TRACKING FD UNIT	YES	Not Taxable
DBE	US46140H3049	INVESCO DB MULTI SECTOR COMMODITY TRUST INVESCO DB ENERGY FUND	YES	Not Taxable

DBO	US46140H4039	INVESCO DB MULTI SECTOR COMMODITY TRUST INVESCO DB OIL FUND	YES	Not Taxable
DBP	US46140H5028	INVESCO DB MULTI SECTOR COMMODITY TRUST INVESCO DB PRECIOUS METALS FUND	YES	Not Taxable
DBS	US46140H2058	INVESCO DB MULTI-SECTOR COMMODITY TRUST INVESCO DB SILVER FUND	YES	Not Taxable
DBV	US46139B1026	INVESCO DB G10 CURRENCY HARVEST FUND INVESCO DB G10 CURRENCY HARVEST FUND	YES	Not Taxable
DCP	US23311P1003	DCP MIDSTREAM, LP	NO	Taxable
DCP-B	US23311P2092	DCP MIDSTREAM LP 7.875% RED PERP CUM PFD UNIT SER B FIXED/FLTG SHS	NO	Taxable
DCP-C	US23311P3082	DCP MIDSTREAM LP 7.95% SRS C FXD TO FLTNG RATE CUM REDMBL PRPTUAL PREF UNITS	NO	Taxable
DEFI	US88166A8053	HASHDEX BITCOIN FUTURES ETF	YES	Not Taxable
DGL	US46140H6018	INVESCO DB MULTI SECTOR COMMODITY TRUST INVESCO DB GOLD FUND	YES	Not Taxable
DIVVZ	US25501P2048	DIVALL INSURED INC PPTYS 02	NO	Taxable
DKL	US24664T1034	DELEK LOGISTICS PARTNERS LP	NO	Taxable
DLNG	MHY2188B1083	DYNAGAS LNG PARTNERS LP	NO	Taxable
DMLP	US25820R1059	DORCHESTER MINERALS LP COM UNITS	NO	Taxable
DTRUY	US23384L1017	DAIMLER TRUCK HLDG AG SPONSORED ADS MASTER LIMITED PARTNERSHIP	NO	Taxable
ECTM	US26827L1098	ECA MARCELLUS TRUST I	NO	Taxable
EFSH	US28252B8046	1847 HOLDINGS LLC	NO	Taxable
ENGY	US1534231089	CENTRAL ENERGY PARTNERS LP	NO	Taxable
ENLC	US29336T1007	ENLINK MIDSTREAM LLC COM UNIT REP LTD MASTER LIMITED PARTNERSHIP	NO	Taxable
EPD	US2937921078	ENTERPRISE PRODS PARTNERS LP COM	NO	Taxable
ESBA	US2921021000	EMPIRE STATE REALTY OP L P SER ES OPERATING PARTNERSHIP UNITS REP LTD PARTNERSHI	NO	Taxable
ET	US29273V1008	ENERGY TRANSFER, L.P.	NO	Taxable
ET-C	US29273V4077	ENERGY TRANSFER LP 7.375% SRS C FXD TO FLTNG RATE CMLTV RDMBL PERPETUAL PREF UNT	NO	Taxable
ET-D	US29273V5066	ENERGY TRANSFER LP 7.625% SRS D FXD TO FLTNG RT CMLTV RDMBL PERPETUAL PREF UNT	NO	Taxable
ET-E	US29273V6056	ENERGY TRANSFER LP 7.600% SRS E FXD TO FLTNG RT CMLTV RDMBL PERPETUAL PREF UNT	NO	Taxable
EUO	US74347W8828	PROSHARES ULTRASHORT EURO	YES	Not Taxable
FGPR	US3152932097	FERRELLGAS PARTNERS-LP	NO	Taxable
FGPRB	US3152933087	FERRELLGAS PARTNERS LP-B	NO	Taxable
FISK	US2921023089	EMPIRE STATE REALTY OP L P SER 250 OPERATING PARTNERSHIP UNITS REP LTD PARTNERSH	NO	Taxable
FPH	US33833Q1067	FIVE POINT HOLDINGS LLC COM CL A MASTER LIMITED PARTNERSHIP	NO	Taxable
FUN	US1501851067	CEDAR FAIR L.P. DEPOSITARY UNIT	NO	Taxable
GBLI	US37959R1032	GLOBAL INDEMNITY GROUP LLC CLASS A COMMON STOCK	NO	Taxable
GDVTZ	US38349K1051	GOULD INVESTORS LP	NO	Taxable
GEL	US3719271047	GENESIS ENERGY LP UNITS LTD PARTNERSHIP INT	NO	Taxable
GLL	US74347W3951	PROSHARES TRUST	YES	Not Taxable
GLP	US37946R1095	GLOBAL PARTNERS LP COM UNIT REPSTG	NO	Taxable
GLP-A	US37946R2085	GLOBAL PARTNERS LP 9.75% SRS A FXD TO FLTNG RT CMLTV RDMBL PRPTL PRFRD UNITS	NO	Taxable
GLP-B	US37946R3075	GLOBAL PARTNERS LP 9.50% SRS B FXD RT CMLTV RDMBL PERPETUAL PREFERRED UNITS	NO	Taxable
GPEOU	US39116T1051	GREAT PLAINS ETHANOL LLC-A	NO	Taxable
GPP	US3932211069	GREEN PLAINS PARTNERS LP COM UNIT REPSTG LTD PARTNER INT	NO	Taxable
GSG	US46428R1077	ISHARES S&P GSCI COMMODITY-INDEXED	YES	Not Taxable
GWYGU	US36761Q1058	GATEWAY GARAGE PARTNERS LLC	NO	Taxable
GYRO	US4038291047	GYRODYNE LLC	NO	Taxable
HEP	US4357631070	HOLLY ENERGY PARTNERS LP COM UNIT	NO	Taxable
HESM	US4281031058	HESS MIDSTREAM LP - CLASS A	NO	Taxable
IDIV	US59140L1008	METAURUS EQUITY COMPONENT TRUST U S CUMULATIVE DIV FUND SERIES 2027 SHARES	NO	Taxable
IEP	US4511001012	ICAHN ENTERPRISES, L.P.	NO	Taxable
IPILF	KYG4723A1085	IMPRO PRECISION INDUSTRIES LIM SHS MASTER LIMITED PARTNERSHIP	NO	Taxable
KNOP	MHY481251012	KNOT OFFSHORE PARTNERS LP COM UNITS MASTER LIMITED PARTNERSHIP	YES	Not Taxable
KOLD	US74347Y8131	PROSHARES ULTRASHORT BLOOMBERG NATURAL GAS	YES	Not Taxable
KRP	US49435R1023	KIMBELL RTY PARTNERS LP UNIT MASTER LIMITED PARTNERSHIP	NO	Taxable
LASBS	US5147091046	LANDA APP 2 LLC MEMBERSHIP INT S MASTER LIMITED PARTNERSHIP	NO	Taxable
LAZ	BMG540501027	LAZARD LTD CL A	NO	Taxable
LHYFF	FR0014009YQ1	LHYFE SA SHS MASTER LIMITED PARTNERSHIP	NO	Taxable
LNKE	US5357631069	LINK ENERGY LLC	NO	Taxable
LSVCS	US5147092036	LANDA APP 2 LLC MEMBERSHIP INT S MASTER LIMITED PARTNERSHIP	NO	Taxable
LSVYS	US5147094016	LANDA APP 2 LLC MEMBERSHIP INT S MASTER LIMITED PARTNERSHIP	NO	Taxable
MMLP	US5733311055	MARTIN MIDSTREAM PARTNERS L P	NO	Taxable
MMP	US5590801065	MAGELLAN MIDSTREAM PARTNERS LP COM	NO	Taxable
MPLX	US55336V1008	MPLX LP	NO	Taxable
MPLXP	US55336V3087	MPLX LP 6.5% A PFD	NO	Taxable
MSVYS	US88556W3007	370 MKTS LLC MEMBERSHIP INT S MASTER LIMITED PARTNERSHIP	NO	Taxable
MYRA	US6289871096	MYRA PARK INVESTORS LP	NO	Taxable
NEN	US6442061049	NEW ENGLAND REALTY ASSOCIATES LP-DEPOSITARY RCPT	NO	Taxable
NEP	US65341B1061	Nextera Energy Partners LP	NO	Taxable
NFE	US6443931000	NEW FORTRESS ENERGY LLC CL A SHS RP LLC MASTER LIMITED PARTNERSHIP	NO	Taxable
NGL	US62913M1071	NGL ENERGY PARTNERS LP	NO	Taxable
NGL-B	US62913M2061	NGL ENERGY PARTNERS LP 9.00% CL B FXD TO FLTNG CMLTV RDMBL PRPTL PFRD UNTS	NO	Taxable
NGL-C	US62913M3051	NGL ENERGY PARTNERS LP 9.625% CL C FXD TO FLTNG CMLTV RDMBL PRPTL PFRD UNTS	NO	Taxable
NGLSpA	US87611X2045	Targa Res PERPETUAL PFD UNIT	NO	Taxable
NMM	MHY622674098	NAVIOS MARITIME PARTNERS L P COM UNIT LPI MASTER LIMITED PARTNERSHIP	YES	Not Taxable

NNUTU	US41988L2025	HAWAIIAN MACADAMIA NUT ORCHA	NO	Taxable
NRP	US63900P6088	NATURAL RESOURCE PARTNERS LP COM	NO	Taxable
NS	US67058H1023	NUSTAR ENERGY LP	NO	Taxable
NS-A	US67058H2013	NUSTAR ENERGY LP 8.50% SERIES A FIXED TO FLOATING RATE CUM RED PFD UNIT	NO	Taxable
NS-B	US67058H3003	NUSTAR ENERGY LP 7.625% SRS B FXD TO FLTG RATE CUM RDMBL PRPTL PRFRRD UNITS	NO	Taxable
NS-C	US67058H4092	NUSTAR ENERGY LP 9.00% SRS C FXD TO FLTG RATE CUM RDMBL PRPTL PRFRRD UNITS	NO	Taxable
NSLPQ	US64881E1091	NEW SOURCE ENERGY PARTNERS L	NO	Taxable
NUSPQ	US64881E3071	NEW SOURCE ENERGY PARTNERS L P 11.00% SER A CMLTV CNVRTBL PFD UNITS	NO	Taxable
NYXH	BE0974358906	NYXOAH S A SHS MASTER LIMITED PARTNERSHIP	NO	Taxable
OAK-A	US6740013007	OAKTREE CAPITAL GROUP LLC 6.625% SERIES A PREFERRED UNITS	NO	Taxable
OAK-B	US6740014096	OAKTREE CAPITAL GROUP LLC 6.550 % SERIES B PREFERRED UNITS	NO	Taxable
OGCP	US2921022099	EMPIRE STATE REALTY OP L P SER 60 OPERATING PARTNERSHIP UNITS REP LTD PARTNERSHI	NO	Taxable
OZ	US0806941029	BELPOINTE PREP LLC	NO	Taxable
PAA	US7265031051	PLAINS ALL AMERN PIPELINE LP	NO	Taxable
PAGP	US72651A2078	Plains GP Holdings LP	NO	Taxable
PBT	US7142361069	Permian Basin Trust UNIT	NO	Taxable
PSNCS	US74458D1037	PUBLIC SNEAKER COLLECTION LLC COM MASTER LIMITED PARTNERSHIP	NO	Taxable
PVVLV	CA70214T1194	PARTNERS VALUE INVTS NON VTG EQU UNT	NO	Taxable
RCAWS	US74984L6948	RSE COLLECTION LLC MEMBERSHIP INT S MASTER LIMITED PARTNERSHIP	NO	Taxable
RCBFS	US74984L6864	RSE COLLECTION LLC MEMBERSHIP INT S MASTER LIMITED PARTNERSHIP	NO	Taxable
RCBOS	US74984L6112	RSE COLLECTION LLC MEMBERSHIP INT S MASTER LIMITED PARTNERSHIP	NO	Taxable
RCEVS	US74984L6781	RSE COLLECTION LLC MEMB INT SR ELVI MASTER LIMITED PARTNERSHIP	NO	Taxable
RCITS	US74984L6526	RSE COLLECTION LLC MEMBERSHIP INT S MASTER LIMITED PARTNERSHIP	NO	Taxable
RCPOS	US74984L6294	RSE COLLECTION LLC MEMBERSHIP INT S MASTER LIMITED PARTNERSHIP	NO	Taxable
RCRAS	US74984L6377	RSE COLLECTION LLC MEMBERSHIP INT S MASTER LIMITED PARTNERSHIP #RABBIT	NO	Taxable
RFNTS	US74985G1408	RSE ARCHIVE LLC MEMBERSHIP INT S MASTER LIMITED PARTNERSHIP	NO	Taxable
RGBYS	US74984L6609	RSE COLLECTION LLC MMEB INT SR GBOY MASTER LIMITED PARTNERSHIP	NO	Taxable
RHARS	US74984L6450	RSE COLLECTION LLC MEMBERSHIP INT S MASTER LIMITED PARTNERSHIP #54AARON	NO	Taxable
RNFCS	US74984L7102	RSE COLLECTION LLC MEMB INT SR 94CS MASTER LIMITED PARTNERSHIP	NO	Taxable
RSGRS	US74984L5957	RSE COLLECTION LLC MEMBERSHIP INT S MASTER LIMITED PARTNERSHIP	NO	Taxable
RSRUS	US74984L8431	RSE COLLECTION LLC MEMB INT SR 32RU MASTER LIMITED PARTNERSHIP	NO	Taxable
RSTRF	CA76090H1038	RESTAURANT BRANDS-EXCH UNITS	NO	Taxable
SBR	US7856881021	Sabine Royalty Trust UNIT	NO	Taxable
SCO	US74347Y7976	PROSHARES UltraShort Bloomberg Crude Oil	YES	Not Taxable
SDTTU	US80007T1016	SANDRIDGE MISSISSIPPIAN TRUS	NO	Taxable
SEQP	US80285Y1038	SANTANA EQUESTRIAN PRIVATE FIN COM MASTER LIMITED PARTNERSHIP	NO	Taxable
SGU	US85512C1053	STAR GROUP L P UNIT LTD PARTNR MASTER LIMITED PARTNERSHIP	NO	Taxable
SIRE	US1724641097	SISECAM RESOURCES LP	NO	Taxable
SMLP	US8661424098	SUMMIT MIDSTREAM PARTNERS LP UNIT	NO	Taxable
SNMP	US30053M1045	EVOLVE TRANSITION INFRASTRUC	NO	Taxable
SOYB	US88166A6073	TEUCRIUM SOYBEAN FUND	YES	Not Taxable
SPH	US8644821048	SUBURBAN PROPANE PARTNERS LP	NO	Taxable
SPKX	US21258A2015	CONVXTY SHS 1X SPIKES FUTUR	NO	Taxable
SPKY	US21258A1025	CONVXTY SHS DAILY 1.5X SP FU	NO	Taxable
SPLP	US85814R1077	STEEL PARTNERS HOLDINGS LP	YES	Not Taxable
SPLP-A	US85814R2067	STEEL PARTNERS HLDS LP	YES	Not Taxable
STGBS	US85573C7213	STARTENGINE COLLECTIBLES FD I MEMBERSHIP INT S MASTER LIMITED PARTNERSHIP	NO	Taxable
SUN	US86765K1097	SUNOCO LP COM UNIT REPSTG LTD	NO	Taxable
SVIX	US92891H1014	-1X SHORT VIX FUTURES ETF	YES	Not Taxable
SVXY	US74347W1302	PROSHARES TR II SHORT VIX SHORT	YES	Not Taxable
TAGS	US88166A7063	TEUCRIUM AGRICULTURAL FUND	YES	Not Taxable
TBSLF	DE000A2PXQD4	TUBESOLAR AG AKTIEN O N MASTER LIMITED PARTNERSHIP	NO	Taxable
TESLU	US90205J1025	286 LENOX PARTNERS LLC	NO	Taxable
THNPY	US87854Y1091	TECHNIP ENERGIES N V SPONSORED ADR MASTER LIMITED PARTNERSHIP	NO	Taxable
TMPLS	US8800141058	TEMPLE I LLC	NO	Taxable
TXO	US87313P1030	TXO ENERGY PARTNERS LP COM UNIT MASTER LIMITED PARTNERSHIP	NO	Taxable
UAN	US1266332055	CVR PARTNERS LP COM UNIT NEW	NO	Taxable
UCO	US74347Y8883	PROSHARES TRUST II ULTA BLOMBERG CRUD OIL	YES	Not Taxable
UDN	US46141D1046	INVESCO DB US DOLLAR INDEX TRUST INVESCO DB US DOLLAR INDEX BEARISH FUND	YES	Not Taxable
UGA	US91201T1025	UNITED STATES GASOLINE FUND LP ETF	YES	Not Taxable
UGL	US74347W6012	PROSHARES ULTRA GOLD	YES	Not Taxable
ULE	US74347W8745	PROSHARES ULTRA EURO	YES	Not Taxable
UNG	US9123183009	UNITED STS NAT GAS FD LP UNIT PAR	YES	Not Taxable
UNL	US91288X1090	UNITED STATES 12 MONTH NATUR	YES	Not Taxable
USAC	US90290N1090	USA COMPRESSION PARTNERS LP	NO	Taxable
USCI	US9117171069	UNITED STATES COMMODITY INDE	YES	Not Taxable
USDP	US9033181036	USD PARTNERS LP COM UNIT REPSTG	NO	Taxable
USL	US91288V1035	UNITED STATES 12 MONTH OIL FUND	YES	Not Taxable
USO	US91232N2071	UNITED STS OIL FD LP UNITS NEW	YES	Not Taxable
UUP	US46141D2036	INVESCO DB US DOLLAR INDEX TRUST INVESCO DB US DOLLAR INDEX BULLISH FUND	YES	Not Taxable

