

# Nonqualified Intermediary (NQI), Non-Withholding Foreign Partnership (NWFP), Non-Withholding Foreign Trust (NWFT) Withholding Statement

*(The following is intended to be used in conjunction with the October 2021 version of Form W-8IMY)*

## General Instructions

- This information will be used by Citi and its affiliates to perform the applicable withholding and information reporting on the underlying account holders
- The columns of the withholding statement are based on what is required under Treasury Regulations
- Information is required for every underlying account holder either on a payee-specific or pooled basis, as required (add lines as necessary)
- To the extent that portion of the income is not allocated to an account holder, Citi is required to apply the presumption rules (under US Treasury Regulations) which may result in the highest applicable rate of withholding
- Publicly Traded Partnership (PTP) transfers or distributions that fall under Sections 1446(a) or 1446(f) require a separate 1446 withholding statement. These instructions do not address PTP transfers or distributions.

### Intermediary Information (top of each withholding statement)

The diagram illustrates the 'Intermediary Information' section of Form W-8IMY, with various fields and their corresponding instructions:

- Effective Date**: Date from which the withholding rates and allocations will apply to the account holders.
- Intermediary's Name**: Information on the intermediary.
- Intermediary's Address**: Information on the intermediary.
- EIN**: Information on the intermediary.
- US TAX ID**: Information on the intermediary.
- Intermediary's Chapter 3 Status Code (drop down)**: Information on the intermediary.
- Intermediary's Chapter 4 Status Code (drop down)**: Information on the intermediary.
- Intermediary's GIIN**: Information on the intermediary.
- Account Number(s)**: Information on the intermediary.
- Account Type (drop down)**: Information on the intermediary.
- Payee Total**: Total number of account holders that are reflected on the withholding statement.
- Please copy down additional rows as required**: Instruction to copy down additional rows as required.
- Complete as appropriate: Citi Account Number(s)**: Instruction to complete as appropriate: Citi Account Number(s).
- Dropdown to select the type of account at Citibank:**
  - Undisclosed
  - segregated
  - tax rate pool
- The Form 1042-S recipient codes / descriptions that apply to the NQI/NWFP/ NWFT**: Information on the intermediary.
- If applicable, based on Chapter 4 (FATCA) status**: Information on the intermediary.
- If applicable, based on Form W-8IMY Line 8**: Information on the intermediary.
- Information on the Intermediary**: Must match what is reflected on the Form W-8IMY.

## Tab 1 of withholding statement: Payee-Specific Information (Full)

- Provide full details of the underlying account holders (ex: name, address, chapter 4 status, type of documentation, withholding rates, etc.) and allocations to each account holder
- Payee specific information is required for Chapters 3 and 61 purposes, and is required for Chapter 4 purposes if the payee is not included in a Chapter 4 (FATCA) pool (see, however, instructions for exempt payee pool)

### (1) Account Holder Information

Type of IRS Form provided by account holder

Drop down with Forms: W-8BEN-E, W-8BEN, W-8EXP, W-8ECI, W-8IMY (if multi-layered structure), and W-9

Name	Country of Residence	Address	Document Type (dropdown)
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Name and residency information of the underlying account holder

Must be consistent with what is on the underlying account holders' Form W-8 or W-9

Only required if account holder is **foreign**

Indicate if they are a beneficial owner, intermediary, flow-through (ex: partnership or trust), US branch, or a Territory Financial Institution

Foreign / US Status (dropdown)	Foreign Status Type (dropdown)	Chapter 3 Status Code (NRA) (dropdown)	Chapter 4 Status Code (FATCA) (dropdown)	US TIN (if applicable)	GIIN (if applicable)	Foreign TIN (if applicable)
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Status of account holder:  
Foreign,  
US exempt (i.e., not subject to  
Forms 1099 reporting), or  
US non-exempt (i.e., subject to  
Forms 1099 reporting)

The Form 1042-S  
recipient  
code/description that  
applies to the account  
holder

US TIN:

- Required if account holder documented with Form W-9
- If applicable, may be provided by foreign account holder

GIIN: if applicable, based on foreign  
account holders' FATCA status

Foreign TIN: if applicable, may be  
provided by foreign account holder

## (2) Withholding Information

### **(a) Backup withholding and FATCA**

Section 3406 Backup Withholding Information	FATCA (Chapter 4) Withholding Information	
24% backup withholding (Y/N) (dropdown)	Chapter 4 Exemption Code <sup>2</sup> (dropdown)	Chapter 4 Withholding Rate (dropdown)

Yes or No indicator if the account holder is subject to 24% backup withholding tax

Exemption code/description (from Form 1042-S) if the account holder is not subject to FATCA withholding  
Must be populated if the FATCA (chapter 4) withholding tax rate is 0%; otherwise select "N/A"

FATCA withholding rate: either 30% or 0%  
A valid exemption code must be provided if 0%

### **(b) Chapter 3**

Non-US Resident (Chapter 3) Withholding Information		
Chapter 3 Exemption Code <sup>2</sup> (dropdown)	Entitled to US Tax Treaty Rates? (Y/N) (dropdown)	If US Tax Treaty Rates claimed, are LOB/894 Provisions Met? (Y/N) (dropdown)

Exemption code/description (from Form 1042-S) if the account holder is not subject to withholding under Chapter 3  
Must be populated if the applicable income type(s) is 0%

Yes or No indicators if the account holder is claiming US tax treaty benefits (based on their status and documentation)  
Both must be "Yes" for treaty rates to be applied

30%, unless reduction or exemption based on underlying Form W-8

0% withholding (if valid beneficial owner Form W-8 for account holder)

Applicable withholding tax rates, based on the status and documentation of the account holder (ex: 0% on portfolio interest, 15% on dividends, etc.)

Non-US Resident (Chapter 3) Withholding Information							
Dividends Withholding Rate	Portfolio Interest Withholding Rate	Non-portfolio Interest Withholding Rate	REIT Ordinary Dividends Withholding Rate	REIT Capital Gain Dividends Withholding Rate	Royalty Trust Withholding Rate	Other Income Withholding Rate	Bank Deposit Interest Withholding Rate

Interest that does not qualify for the portfolio interest exemption (ex: contingent interest)

Will either be 21% or the REIT ordinary dividend rate (based on status and documentation of account holder)

Catchall for income not otherwise covered in one of the other categories

### (3) Allocation Information

Allocation percentage	<p>Percentage of payments allocated to each account holder</p> <p>Total must equal 100%</p>
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### (4) Underlying intermediary / flow-through information (if required)

Identify each **foreign** intermediary or flow-through entity that is receiving a payment, excluding any intermediary or flow-through entity that is an account holder or interest holder in another qualified intermediary, withholding foreign partnership, or withholding foreign trust

Underlying intermediary or flow through information (if required) <sup>3</sup>		
Name of intermediary or flow through	Intermediary or flow-through Ch4 Status (dropdown)	Intermediary or flow-through GIIN

Populate name of the **foreign** intermediary or flow-through if a multi-layered structure (i.e., account holders are documented with Forms W-8IMY)

The Form 1042-S recipient code/description that applies to the intermediary or flow-through account holder

If applicable, the GIIN of the intermediary / flow-through account holder based on their FATCA status

## **(5) Certifications**

	<b>All of the below statements must be certified:</b>
1) I certify that:	
2) I certify that:	

Drop downs with withholding statement certifications  
Both certifications must be made for the withholding statement to be considered valid  
  
Review the statements to confirm that the requirements have been satisfied

## **Tab 2 of withholding statement: Payee-Specific (Alternative)**

- The withholding statement is not required to contain information that is included on the Forms W-8 or W-9 provided by the underlying account holder (e.g., name, address, chapter 4 status, etc.)
  - Allocation information must be provided on the withholding statement
  - All underlying account holders documentation must be provided before a payment is made
  - The withholding statement is also not required to specify the withholding tax rates, if all the rates can be determined from the Form W-8 or W-9
  - If providing an alternative withholding statement, the appropriate box must be checked on Form W-8IMY (Part IV or VIII)

### **(1) Simplified Information**

Name	Allocation percentage

Percentage of payments allocated to each account holder  
Total must equal 100%

Name of the account holder  
Must match what is on the Form W-8 or W-9

### **(2) Certifications**

All of the below statements must be certified:	
1) I certify that:	
2) I certify that:	

Drop downs with withholding statement certifications

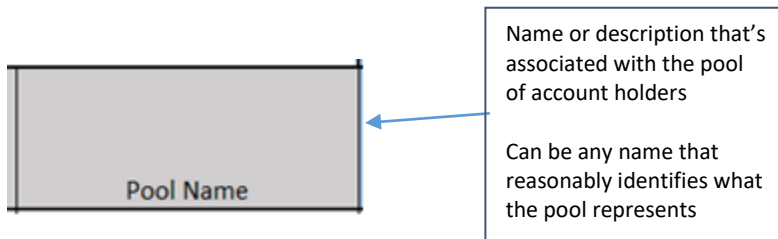
- Both certifications must be made for the withholding statement to be considered valid

Review the statements to confirm that the requirements have been satisfied

### Tab 3 of withholding statement: Chapter 4 Pools

- FATCA withholding rate information is provided for “pools” of account holders that fall into certain categories:
  - Nonparticipating
  - Recalcitrant
  - US payees
- An **exempt payees pool** can also be provided for account holders (other than NQIs and flow-throughs) not subject to any reporting (Forms 1042-S, 1099, and 8966)
  - This applies only to US source **bank deposit interest**
  - Payee-specific information and documentation for the account holders in the pool must also be provided
- Payee-specific information is required if a Chapter 4 pool is not provided for a withholdable payment

#### (1) Account and pool information



## (2) FATCA withholding information and allocations

FATCA withholding rate:  
either 30% or 0%

A valid exemption code  
must be provided if 0%

FATCA (Chapter 4) Withholding Information			
Chapter 4 Pool <sup>2,3</sup> (if applicable) (dropdown)	Chapter 4 Withholding Rate (dropdown)	Chapter 4 Exemption Code <sup>4</sup> (dropdown)	Allocation percentage

Percentage of  
payments allocated  
to each account  
holder

Type of pool, based on Form 1042-S codes/descriptions:  
Recalcitrant (5 types, based on status of account holders)  
Nonparticipating FFI  
US payee pools  
Specific type of account holders that follow certain reporting requirements  
Line 17c of Form W-8IMY (2021) must be selected

“Exempt payees pool” applies to **bank deposit interest** only  
Account holders cannot be  
NQIs or flow-through entities  
subject to any reporting (on Forms 1042-S, 1099, or 8966)  
Payee-specific information and documentation for the account holders must also be provided (allocation information is not required)

Exemption code/description (from Form 1042-S) if the account holder is not subject to FATCA withholding

Must be populated if the FATCA (chapter 4) withholding tax rate is 0%; otherwise select “N/A”



### **(3) Certifications**

**All of the below statements must be certified:**

1) I certify that:

2) I certify that:

3) I certify that:

Drop downs with withholding statement certifications

- The first two certifications must be made for the withholding statement to be considered valid
- The third certification is specific to US payee pools, and must be made if this type of pool is provided

Review the statements to confirm that the requirements have been satisfied