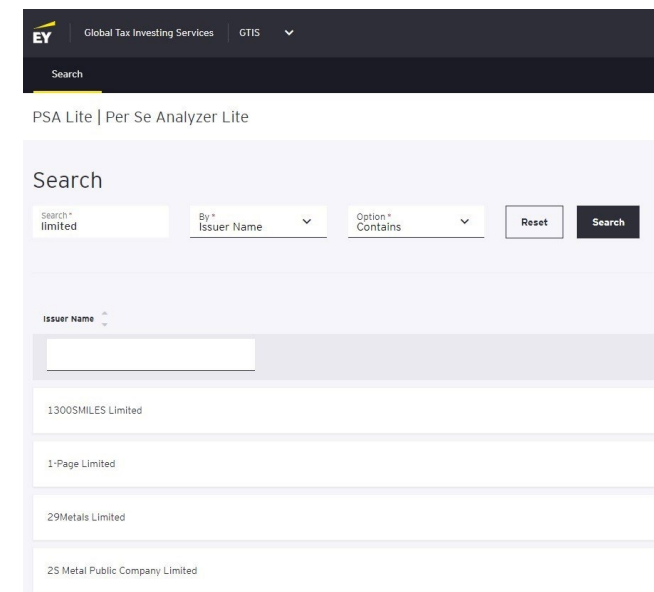


Per Se Analyzer

Identify the per se status of publicly
traded foreign and US holdings

Efficient identification

In addition to a report based on your holdings, you can also subscribe to Per Se Analyzer Lite, which is a repository of all of the entities reviewed to date.



Investing on behalf of sovereign wealth funds (SWFs) carries significant risk of impacting their tax-exempt status

Deriving any income from the conduct of a commercial activity within the meaning of Code Section 892(a)(2)(A)(i) could have an impact on an SWF's tax-exempt status. Flow-through entities, such as trusts or partnerships, which typically generate this type of income, are not easily identifiable.

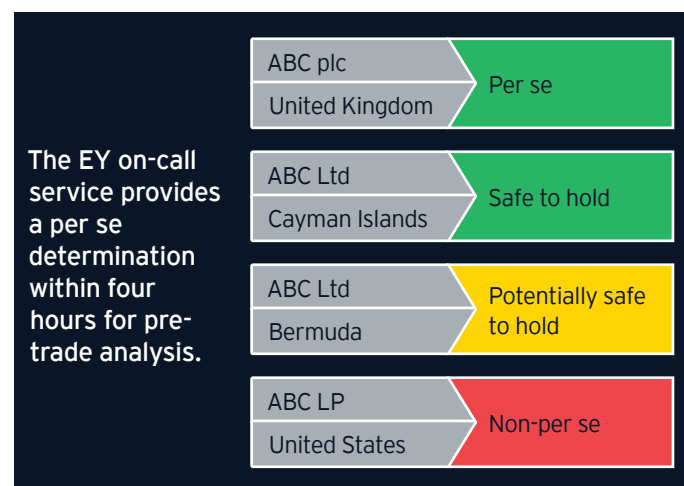
Of late, an increase in restrictive mandates from SWFs requires asset managers to not invest in any security that could result in income from commercial activities.

Per Se Analyzer can potentially help reduce this risk. The tool can efficiently identify publicly traded corporate and noncorporate entities.

Improve pre-trade analysis with the Per Se Analyzer service

The Per Se Analyzer service can be tailored to help meet your needs with monthly, daily or "on-call" reports. Our team assists with requests for per se analysis 24 hours a day and seven days a week, including holidays:

- ▶ The service includes a detailed report designating each entity's corporate status as "per se" or "non-per se."
- ▶ Entities that are treated as corporations under Section 301.7701-2(b) of the United States Treasury Regulations are classified as "per se."
- ▶ "Non-per se" entities undergo further review and are classified as "safe to hold" or "potentially safe to hold" for US tax purposes:
 - ▶ "Safe to hold" – Entities provide sufficient documentation indicating corporate status.
 - ▶ "Potentially safe to hold" – Entities do not provide sufficient documentation indicating either corporate or flow-through status.
- ▶ Flow-through entities are classified as "non-per se."



The portal is updated continuously, enabling you to have quick and easy access to per se determinations for your pre-trade analysis.

Ask us about our other global investing tax services with respect to compliance and reporting

- ▶ Corporate Actions Tax Analyzer (CATA)
- ▶ Foreign Tax Credit (FTC) Assessment
- ▶ Foreign Tax Forms Completion (FTFC) Service
- ▶ Global Withholding Health Check
- ▶ Global Withholding Tax Reporter (GWTR)
- ▶ GWTR Digital Tax Rate Transfer
- ▶ Passive Foreign Investment Company (PFIC) Analyzer
- ▶ Publicly Traded Partnership (PTP) Analyzer
- ▶ Qualified Foreign Corporation (QFC) Analyzer
- ▶ Rapid Reclaim Analyzer and Recovery Service
- ▶ Rapid Security Analyzer (RSA)

Discover your Per Se Analyzer team



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