

ELECTION UNDER SECTION 191.2 BY AN ISSUER OF TAXABLE PREFERRED SHARES TO PAY PART VI.1 TAX AT A RATE OF 40%

| Name of corporation | Account / Business Number | Taxation year-end | | |
|---------------------|---------------------------|-------------------|-------|------|
| | | Day | Month | Year |
| | | | | |

- For use by taxable Canadian corporations (other than a financial intermediary corporation or a private holding corporation).
- This election may be made only if the terms and conditions that apply to the particular class of shares require that this election be made. Where shares of a class are issued in one or more series, a class is to be taken to mean a series of the class.
- This election has to be filed:
 - a) within six months of the taxation year in which shares of that particular class of shares are first issued or first become taxable preferred shares, or
 - b) within 6 months of the day of mailing of
 - (i) any notice of assessment of tax payable under Part I or Part VI.1
 - (ii) a notice that an assessment for which a notice of objection had been filed has been confirmed or varied
 - (iii) a copy of the decision of the Tax Court of Canada to the taxpayer, or
 - c) within 6 months from the day the judgment of the Federal Court of Canada or the Supreme Court of Canada is pronounced or delivered or the day the corporation discontinues the appeal.
- Parts and sections referred to on this form are parts and sections of the Income Tax Act.
- For more information, see the T2 Corporation Income Tax Guide.

Complete the following:

Class of taxable preferred shares for which this election is made

Date on which the class of shares was first issued or first became taxable preferred shares

| (1) | |
|-----|--|
| (2) | |
| (3) | |
| (4) | |

Note 1: If more than four classes of shares, attach a schedule.

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Note 2: Attach documentation outlining the terms and conditions of the shares for which this election is made.

| Election and Certification | | | | | |
|--------------------------------|---|------------------------------|--------------------|--|--|
| The above-named corpor | ration hereby elects under section 191.2 of the Inco. | me Tax Act. | | | |
| l, | (Please print) | v certify that the informati | ion given in this | | |
| election and in any docur | mentation attached, is to the best of my knowledge, | correct, and complete in | every detail. | | |
| Date | Signature of authorized officer | Position | Position or office | | |
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