

# PFIC ANNUAL INFORMATION STATEMENT FOR THE YEAR ENDED MARCH 31, 2021



## IMPORTANT TAX NOTICE TO U.S. PERSONS WHO ARE SECURITYHOLDERS OF:

### CI WisdomTree Japan Equity Index ETF (JAPN\_Hedged) (the “Fund”)

This statement is provided to securityholders who are United States persons for purposes of the U.S. Internal Revenue Code of 1986, as amended (“IRC”) and the regulations thereunder. United States persons include U.S. citizens (whether or not they are U.S. residents), certain individuals with U.S. permanent resident status, U.S. corporations, and certain U.S. trusts and estates. Securityholders of the Fund should consult with a U.S. tax professional to determine whether they are United States persons.

The Fund may be considered as a Passive Foreign Investment Company (“PFIC”) as defined in Section 1297(a) of the IRC for the year ended March 31, 2021. Therefore, United States persons who hold securities of the Fund (the “Securities”) may be subject to the U.S. tax rules applicable to investments in PFICs.

If you are a securityholder who is a United States person, consider consulting a tax advisor concerning the overall tax consequences of your ownership of Securities of the Fund and your U.S. tax reporting requirements, including the merits of the various available tax elections, such as the Qualified Electing Fund (“QEF”) election. You can also find information on U.S. tax rules applicable to investments in a PFIC on the IRS website, [www.irs.gov](http://www.irs.gov), by searching “Form 8621 Instructions”.

Below is a PFIC Annual Information Statement (“AIS”) for the Fund. The PFIC AIS has been prepared in compliance with the requirements under Treasury Regulation §1.1295-1(g)(1). The PFIC AIS contains information to enable U.S. investors to elect to treat the Fund as a QEF.

Generally, a QEF election is made using IRS Form 8621 (“Return by a Shareholder of a Passive Foreign Investment Company or Qualified Electing Fund”) and is filed for each fund for which you wish to make a QEF election. Where a United States person is a securityholder in a CI Exchange-Traded Fund that holds other CI Exchange-Traded Funds in its portfolio, that person is an indirect investor in the underlying funds, and is required to file a separate election form for each of the underlying funds. The attached information is designed to enable a securityholder to make a QEF election for both the directly held CI Exchange-Traded Fund and the indirectly held underlying CI Exchange-Traded Funds.

Please be aware that cash and property distributions reported on the PFIC AIS are converted into U.S. dollars based on the U.S. Federal Reserve spot rate in effect on the date the distribution is paid. Investors in the Fund who do not file U.S. federal income tax returns on a cash basis should consult their tax advisors regarding the appropriate U.S. dollar conversion rate.

Note that the information attached with this notice is intended to help securityholders who are United States persons make one or more QEF elections, if they decide to do so, and neither such information nor this letter constitutes tax advice.

Such securityholders should seek advice based on their particular circumstances from an independent tax advisor.

For further information, please contact your advisor, a U.S. tax advisor or the manager of the Fund, CI Investments Inc. at 1-877-642-1289 or [info@firstasset.com](mailto:info@firstasset.com)

PFIC Annual Information Statement for the year ended March 31, 2021

CI WisdomTree Japan Equity Index ETF (JAPN\_Hedged) (the “Fund”)

(1) This information statement applies to the taxable year of the Fund beginning on April 1, 2020 and ending on March 31, 2021.

(2) a) Your pro-rata share of the ordinary earnings of the Fund and each of its subsidiaries for the taxable year specified above may be determined by multiplying the number of units you held on each day by the ordinary earnings figures below, and adding the resulting sums for each day during the year in which you held units of the Fund. Similarly, for units of a subsidiary of the Fund at any time during the year, your indirect pro-rata share of the ordinary earnings of such subsidiary, set out in the table below, may be determined by multiplying the number of units you held in the Fund by the ordinary earnings figures for each of these subsidiaries, and adding the resulting sums for each day during the year in which you held units of the Fund.

Directly Held Fund	Ticker	Ordinary Earnings per Unit per Day (US\$)
CI WisdomTree Japan Equity Index ETF	JAPN	0.0373617500

Example: Ms. Johnson owned 100 units of the Fund from the period April 1, 2020 through September 30, 2020. She purchased another 100 units of the Fund on October 1, 2020. Ms. Johnson did not sell any units of the fund at any time during the year. The ordinary earnings of the Fund were \$0.0006 per unit per day. Result: Ms. Johnson’s ordinary earnings for the year ended March 31, 2021 are  $(\$0.0006 * 183 \text{ days} * 100) + (\$0.0006 * 182 \text{ days} * 200) = \$32.82$ .

b) Your pro-rata share of the net capital gain of the Fund for the taxable year specified above may be determined by multiplying the number of units you held on each day by the net capital gain figures below, and adding the resulting sums for each day during the year in which you held units of the Fund. Similarly, for units of a subsidiary of the Fund at any time during the year, your indirect pro-rata share of the net capital gain of these funds, set out in the table below, may be determined by multiplying the number of units you held in the Fund by the net capital gain figures for each of these subsidiaries, and adding the resulting sums for each day during the year in which you held units of the Fund.

Directly Held Fund	Ticker	Net Capital Gains per Unit per Day (US\$)
CI WisdomTree Japan Equity Index ETF	JAPN	0.0000000000

Example: Ms. Johnson owned 100 units of the Fund from the period April 1, 2020 through September 30, 2020. She purchased another 100 units of the Fund on October 1, 2020. Ms. Johnson did not sell any units of the fund at any time during the year. The net capital gains of the Fund were \$0.0006 per unit per day. Result: Ms. Johnson’s net capital gains for the year ended March 31, 2021 are  $(\$0.0006 * 183 \text{ days} * 100) + (\$0.0006 * 182 \text{ days} * 200) = \$32.82$ .

PFIC Annual Information Statement for the year ended March 31, 2021

CI WisdomTree Japan Equity Index ETF (JAPN\_Hedged) (the “Fund”)

(3) The amount of cash and fair market value of other property distributed or deemed distributed during the taxable year specified in paragraph (1) is as follows:

Cash/property distributions per Unit (US\$):

Payment Date	Directly Held Fund
	JAPN
7-Apr-20	0.0751556796
7-May-20	-
5-Jun-20	-
8-Jul-20	0.0627815939
10-Aug-20	-
8-Sep-20	-
7-Oct-20	0.1016336671
6-Nov-20	-
7-Dec-20	-
8-Jan-21	-
29-Jan-21	-
26-Feb-21	-
31-Mar-21	0.0262508949

(4) The Fund named above will, upon receipt of a request, permit you to inspect and copy its permanent books of account, records, and other such documents as may be maintained by the Fund that are necessary to establish its ordinary earnings and net capital gains computed in accordance with U.S. income tax principles and to verify these amounts and your pro-rata share thereof. The per-security amount of cash and fair market value of other properties distributed or deemed distributed by the Fund to securityholders during the period specified in paragraph (1) are provided in the chart above.

By: CI Investments Inc.,  
as manager of the Fund  
March 18, 2022



**For more information, please visit [firstasset.com](http://firstasset.com).**

---

#### **IMPORTANT INFORMATION**

The information contained herein is taken from the audited financial statements of the various funds. Copies of the financial statements are available on CI Exchange-Traded Funds' internet site at [www.firstasset.com](http://www.firstasset.com). The information contained herein is provided in order to assist securityholders in making calculations and does not constitute tax advice. Securityholders are advised to consult their own tax advisors concerning the overall tax consequences of the ownership of securities arising in their own particular situations under United States federal, state, local or foreign law. This material is for informational purposes only. This material is not research, investment, legal or tax advice, and is not an implied or express recommendation, offer or solicitation to buy or sell any security or to adopt any particular investment or portfolio strategy. Any views and opinions expressed do not take into account the particular investment objectives, needs, restrictions and circumstances of a specific investor and, thus, should not be used as the basis of any specific investment decision. Please consult your own financial and/or tax advisor for financial and/or tax information applicable to your specific situation.

CI Global Asset Management is a registered business name of CI Investments Inc.

© CI Investments Inc. 2020. All rights reserved.