

# TAINA

Regulatory Technology as a  
Competitive Advantage

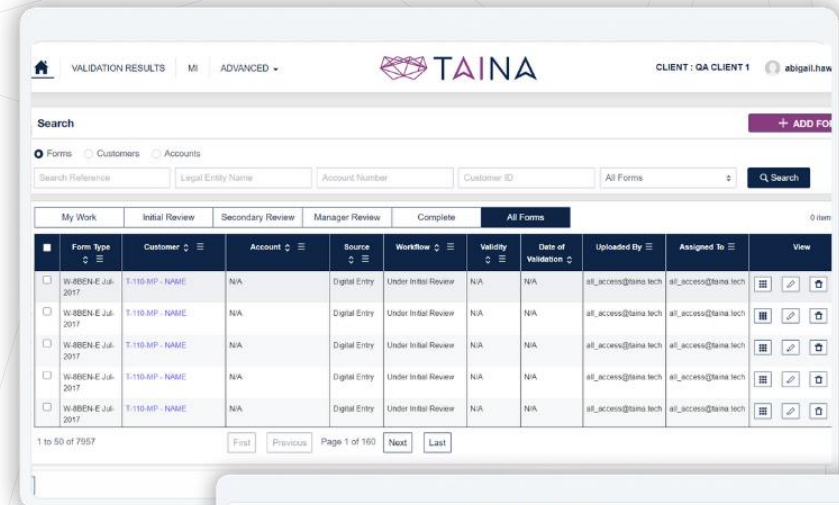
## TAINA Solutions For 1.1446(f)

April 2021



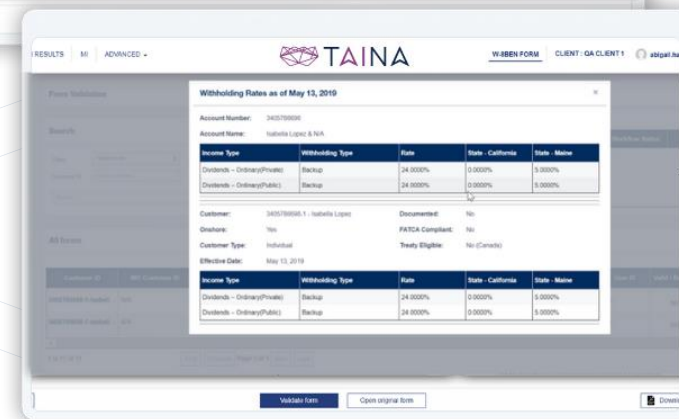
# TAINA Solutions for 1.1446(f)

- Requirements under 1.1446(f)
  - Withholding is required on the disposition of a partnership interest (including a PTP) unless an exception applies.
  - A broker for the seller who pays the proceeds of a PTP sale to another broker (such as the custodian) must either withhold or establish an exception, No DVP exception
- How can TAINA help?
  - TAINA can provide a system for tracking events, collecting withholding certificates and managing withholding



The screenshot shows the TAINA web application interface. At the top, there are navigation tabs for 'VALIDATION RESULTS', 'MI', and 'ADVANCED'. The TAINA logo is on the right, along with 'CLIENT: QA CLIENT 1' and a user profile 'abigail.haw'. Below the navigation is a search bar with a '+ ADD FORM' button. Underneath, there are filters for 'Forms', 'Customers', and 'Accounts'. A search input field contains 'Search Reference', 'Legal Entity Name', 'Account Number', 'Customer ID', and 'All Forms'. Below the search bar is a table with columns: 'My Work', 'Initial Review', 'Secondary Review', 'Manager Review', 'Complete', and 'All Forms'. The 'All Forms' tab is selected, showing a table of forms. The table has columns: 'Form Type', 'Customer', 'Account', 'Source', 'Workflow', 'Validity', 'Date of Validation', 'Uploaded By', 'Assigned To', and 'View'. There are five rows of data, each representing a form with a checkbox, a form type 'W-8BEN-E Jul 2017', a customer 'T-110 MP - NAME', an account 'N/A', a source 'Digital Entry', a workflow 'Under Initial Review', a validity 'N/A', a date of validation 'N/A', an uploaded by 'at\_access@tama.tech', and an assigned to 'at\_access@tama.tech'. At the bottom of the table, it says '1 to 50 of 7957' and has navigation buttons for 'First', 'Previous', 'Page 1 of 160', 'Next', and 'Last'.

Form Type	Customer	Account	Source	Workflow	Validity	Date of Validation	Uploaded By	Assigned To	View
<input type="checkbox"/>	W-8BEN-E Jul 2017	T-110 MP - NAME	N/A	Digital Entry	Under Initial Review	N/A	N/A	at_access@tama.tech	at_access@tama.tech
<input type="checkbox"/>	W-8BEN-E Jul 2017	T-110 MP - NAME	N/A	Digital Entry	Under Initial Review	N/A	N/A	at_access@tama.tech	at_access@tama.tech
<input type="checkbox"/>	W-8BEN-E Jul 2017	T-110 MP - NAME	N/A	Digital Entry	Under Initial Review	N/A	N/A	at_access@tama.tech	at_access@tama.tech
<input type="checkbox"/>	W-8BEN-E Jul 2017	T-110 MP - NAME	N/A	Digital Entry	Under Initial Review	N/A	N/A	at_access@tama.tech	at_access@tama.tech
<input type="checkbox"/>	W-8BEN-E Jul 2017	T-110 MP - NAME	N/A	Digital Entry	Under Initial Review	N/A	N/A	at_access@tama.tech	at_access@tama.tech



The screenshot shows a 'Withholding Rates as of May 13, 2019' window in the TAINA web application. The window displays account information and withholding rates. The account number is '340379000' and the account name is 'Isabella Lopez & N/A'. Below this is a table with columns: 'Income Type', 'Withholding Type', 'Rate', 'State - California', and 'State - Maine'. There are two rows of data: 'Dividends - Ordinary/Private' with a backup rate of 24.0000% and a state rate of 0.0000% for California and 0.0000% for Maine; and 'Dividends - Ordinary/Public' with a backup rate of 24.0000% and a state rate of 0.0000% for California and 0.0000% for Maine. Below the table, there is customer information: 'Customer: 340379000-1 - Isabella Lopez', 'Documented: No', 'Onshore: Yes', 'FATCA Compliant: No', 'Customer Type: Individual', and 'Treaty Eligible: No (Canada)'. The effective date is 'May 13, 2019'. At the bottom of the window, there are buttons for 'Validate form' and 'Open original form', and a 'Done' button.

Income Type	Withholding Type	Rate	State - California	State - Maine
Dividends - Ordinary/Private	Backup	24.0000%	0.0000%	0.0000%
Dividends - Ordinary/Public	Backup	24.0000%	0.0000%	0.0000%

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## Withholding Exceptions

- ▶ Non-foreign Status Exception
- ▶ No Realized Gain Exception
- ▶ 10-percent Effectively Connected Gain Exception
- ▶ Qualified notices published by PTP
- ▶ Withholding previously executed
- ▶ US clearing organization

## Withholding Certificates

- ▶ Transferor's certification of non-foreign status
- ▶ Transferor's certification of no realized gain (also partnership's certification of ordinary income under Section 751)
- ▶ Transferor's certification of less than 10% ECI (standard)
- ▶ Transferor's certification of less than 10% ECI (partnership distributions)
- ▶ Transferor's certification of non-recognition of gain (full)
- ▶ Transferor's certification of non-recognition of gain (partial)
- ▶ Transferor's certification of maximum tax liability (also partnership's certification aggregate deemed sale EC)
- ▶ Partnership's certification of less than 10% EC gain or not engaged in a trade or business within the U.S.

## Withholding Management

- ▶ Tracking of withholdable events
- ▶ Solicitation of withholding certificates
- ▶ Identification of sender for electronic communication
- ▶ Collecting and supplying Qualified Notice data
- ▶ Storing withholding exemptions and certificates for audit
- ▶ Recording documentation from agents
- ▶ Collection and validation of forms W-8 and W-9 for withholding