

Report of Organizational Actions Affecting Basis of Securities

▶ See separate instructions.

Part I Reporting Issuer

1 Issuer's name See attached Schedule		2 Issuer's employer identification number (EIN) N/A	
3 Name of contact for additional information Bruce Norgren	4 Telephone No. of contact (416) 933-6278	5 Email address of contact bnorgren@NElinvestments.com	
6 Number and street (or P.O. box if mail is not delivered to street address) of contact 400- 155 University Avenue		7 City, town, or post office, state, and Zip code of contact Toronto, Ontario, M5H 3B7	
8 Date of action see column 16 of attached schedule		9 Classification and description non-taxable cash/stock distribution	
10 CUSIP number N/A	11 Serial number(s) N/A	12 Ticker symbol N/A	13 Account number(s) N/A

Part II Organizational Action Attach additional statements if needed. See back of form for additional questions.

14 Describe the organizational action and, if applicable, the date of the action or the date against which shareholders' ownership is measured for the action ▶

A non-taxable cash or stock distribution was made to shareholders. See column 16 of the attached schedule for the date of the organizational action.

15 Describe the quantitative effect of the organizational action on the basis of the security in the hands of a U.S. taxpayer as an adjustment per share or as a percentage of old basis ▶

See attached schedule.

16 Describe the calculation of the change in basis and the data that supports the calculation, such as the market values of securities and the valuation dates ▶

The taxpayer's earnings and profits were estimated under IRC § 312 and the regulations thereunder. Amounts distributed in excess of earnings and profits reduced the shareholder's tax basis in its shares (to the extent of basis).

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ _____
IRC § 301 (c) (2)

18 Can any resulting loss be recognized? ▶ _____
No.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ _____
These actions are effective on the date of the distribution identified in column 16 of the attached schedule.

Under penalties of perjury, I declare that I have examined this return, including accompanying schedules and statements, and to the best of my knowledge and belief, it is true, correct, and complete. Declaration of preparer (other than officer) is based on all information of which preparer has any knowledge.

Sign Here

Signature ▶  Date ▶ January 21, 2013

Print your name ▶ B. Mark Riden Title ▶ SVP & Chief Financial Officer

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	Firm's name ▶				Firm's EIN ▶
	Firm's address ▶				Phone no.