



## **Important Tax Notice to U.S. Unitholders**

This statement is provided to unitholders who are United States persons for purposes of the U.S. Internal Revenue Code of 1986, as amended (“IRC”) and the regulations thereunder. It is not relevant to other unitholders.

Russell Investments Global Infrastructure Pool (formerly Russell Global Infrastructure Pool) (the “Fund”) may be deemed to be classified as a Passive Foreign Investment Company (“PFIC”) as defined in Section 1297(a) of the IRC for the year ending December 31, 2016 and thus, its unitholders are unitholders of the PFIC.

We recommend that all U.S. taxpayer clients consult a tax advisor concerning the overall tax consequences of their ownership of units of the Fund and their U.S. tax reporting requirements. 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”.

Please find below a PFIC Annual Information Statement (“AIS”) for the Fund. The PFIC AIS is being provided pursuant to the requirements of Treasury Regulation §1.1295-1(g)(1). The PFIC AIS contains information to enable you, should you so choose based on the advice of your tax advisor in light of your personal tax circumstances, to elect to treat the Fund as a qualified electing fund (“QEF”).

Generally, an election is filed for each mutual fund for which you wish to make a QEF election. If you hold units of the Fund and the Fund holds units of one or more underlying mutual funds, you will receive a combined PFIC AIS containing information that will enable you to elect to treat any or all of the funds as a QEF as you choose, as well as information relating to your units and values in your indirect holdings.

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. We recommend that clients who do not file U.S. federal income tax returns on a cash basis consult their tax advisors regarding the appropriate U.S. dollar conversion rate.

Note that the information attached with this letter is intended to help you make one or more QEF elections, if you decide to do so, and neither such information nor this letter constitutes tax advice. The taxpayer should seek advice based on their particular circumstances from an independent tax advisor.

If you have any questions regarding this matter, please contact your advisor, a U.S. tax advisor or Client Relations at [www.russell.com](http://www.russell.com). Thank you for investing in Russell Investments Canada Limited.



**Russell Investments Global Infrastructure Pool  
(formerly Russell Global Infrastructure Pool)  
PFIC Annual Information Statement  
For the Year Ending December 31, 2016**

1) This Information Statement applies to the taxable year of the Fund for the year beginning on January 1, 2016 and ending on December 31, 2016.

2) Your pro-rata per unit amounts of ordinary earnings and net capital gains for each Series of the Fund for the period specified in paragraph (1) are as follows:

Series	Ordinary Earnings (US\$)	Net Capital Gains (US\$)
Series A	\$0.45525	\$0.07030
Series B	\$0.46553	\$0.07266
Series E	\$0.46289	\$0.07172
Series F	\$0.59163	\$0.07518
Series O	\$0.69658	\$0.07494
Series P	\$0.50384	\$0.06216

To determine your pro-rata unit of the amounts above, multiply the amounts by the number of units of each Series you held during the year.

- i. If you owned the same number of units from January 1, 2016 through December 31, 2016 multiply the number of such units by the amounts above.
- ii. If you did not own the same number of units from January 1, 2016 through December 31, 2016, multiply the number of units you owned by the amounts above as well as by the number of days the units were held in 2016 and divide the result by 366.

*Example 1: On January 1, 2016, you acquired 10,000 units of Series A which earned \$0.45525 ordinary earnings per unit and \$0.07030 net capital gains per unit, and held them throughout the year. Your pro-rata share of Series A's ordinary earnings and net capital gains would be US\$4,552.50 (i.e., 10,000 units x \$0.45525) and US\$703.00 (i.e., 10,000 units x \$0.07030) respectively.*

*Example 2: On July 1, 2016, you acquired 10,000 units of Series B which earned \$0.46553 ordinary earnings per unit, and \$0.07266 net capital gains per unit, and held them throughout the remainder of the year (184 days). Your pro rata share of Series B's ordinary earnings and net capital gains per unit would be US\$2,340.37 (i.e., 10,000 units x \$0.46553 x 184/366) and US\$365.29 (i.e., 10,000 units x \$0.07266 x 184/366) respectively.*

*Example 3: On August 1, 2016, you acquired another 2,000 units of Series A in addition to the 10,000 units in example 1 and held 12,000 units for the remainder of the year, (153 days.) Your total pro-rata share of Series A's ordinary earnings would be US\$4,933.12 ( $\$4,552.50 + (2,000 \text{ units} \times \$0.45525 \times 153/366)$ ). Your total pro-rata share of Series A's net capital gains would be US\$761.78 ( $\$703.00 + (2,000 \text{ units} \times \$0.07030 \times 153/366)$ ).*



3) Your pro-rata share of cash distributions<sup>1</sup> and property distributions for each Series of the Fund for the period specified in paragraph (1) are as follows:<sup>2</sup>

Series	Property Distributions (US\$)	Cash Distributions (US\$)
Series A	\$0.40773	\$0.00000
Series B	\$0.41561	\$0.00000
Series E	\$0.41750	\$0.00000
Series F	\$0.53220	\$0.00000
Series O	\$0.63237	\$0.00000
Series P	\$0.44560	\$0.00000

To determine your pro-rata unit of the amounts above, multiply the amounts by the number of units of each Series you held during the year.

- i. If you owned the same number of units from January 1, 2016 through December 31, 2016, multiply the number of such units by the amounts above.
- ii. If you did not own same number of units from January 1, 2016 through December 31, 2016, multiply the number of units you owned by the amounts above as well by the number of days the units were held in 2016 and divide the result by 366.

4) The Fund 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 under IRC Section 1293 and to verify these amounts and your pro-rata share thereof.

By: David Steele  
Title: President  
Date: March 31, 2017

THIS INFORMATION CONTAINED HEREIN IS TAKEN FROM THE AUDITED FINANCIAL STATEMENTS OF THE VARIOUS RUSSELL INVESTMENT FUNDS AND IS PROVIDED IN ORDER TO ASSIST UNITHOLDERS IN MAKING CALCULATIONS AND DOES NOT CONSTITUTE TAX ADVICE. COPIES OF THE FINANCIAL STATEMENTS ARE AVAILABLE AT WWW.RUSSELL.COM. UNITHOLDERS ARE ADVISED TO CONSULT THEIR OWN TAX ADVISORS CONCERNING THE OVERALL TAX CONSEQUENCES OF THE OWNERSHIP OF UNITS ARISING IN THEIR OWN PARTICULAR SITUATIONS UNDER UNITED STATES FEDERAL, STATE, LOCAL OR FOREIGN LAW.

<sup>1</sup> Cash distributions only represent distributions in U.S. currency. Distributions in Canadian currency are reported as property distributions for U.S. tax purposes.

<sup>2</sup> Distributions represent average distributions that are not reinvested in the fund. If you have elected to reinvest your distributions, the above amount may not be reflective of the actual distribution amount you received during the year. If you have made a QEF election, your basis in your fund units is based on your investment in the fund before the election, plus your share of ordinary earnings and/or net capital gains less the actual distributions you have received during the year. You should consult your U.S. tax advisor to determine your basis in the fund units during the year.