

MEMO# 2073

July 31, 1990

INSTITUTE SURVEY RELATING TO PFICS

- 1 - July 31, 1990 TO: ACCOUNTING/TREASURERS COMMITTEE NO. 24-90 TAX COMMITTEE NO. 20-90 INTERNATIONAL FUNDS TASK FORCE NO. 17-90 RE: INSTITUTE SURVEY RELATING TO PFICS _____

The following is the survey information which the Institute has received from members regarding entities which have been suspected of being passive foreign investment companies ("PFICs"). (See Institute Memorandum to Accounting/Treasurers Committee No. 18-90 and Tax Committee No. 14-90, dated June 22, 1990.) Suspected PFICs are broken down into three categories: (1) entities which have been determined to be PFICs, (2) entities which are potentially PFICs, but whose status is unclear, and (3) entities which were suspected of being, but were determined not to be, PFICs. With respect to each category of PFIC, the listing includes the name of the entity and, if known, the entity's country of domicile. The Institute has not independently verified any of the information in this memorandum, and the information should not be relied upon without further investigation by fund auditors or counsel. Entities preceded by an asterisk are listed in more than one section.

I. Entities which have been determined to be PFICs. Name of PFIC Country of Domicile Abtrust New Thai Fund, The United Kingdom Anglo American Gold Investment Co. Ltd. Bangkok Fund Thailand Brazilian Investment Co. Brazil *Cheung Kong Holding Hong Kong Compaigne Bancaire France Formosa Fund, The Taiwan General Property Trust (Capital Share) Australia - 2 - 3 - General Property Trust (Income Share) Australia Hungarian Fund, The (and Warrants) Hungary India Fund, The India India Magnum Fund India India Magnum Fund N.V., The Indonesia Indonesia Growth Fund Indonesia JF Philippine Fund Philippines Jakarta Fund Indonesia? Korea Emerging Companies Trust Korea Korea Europe Fund Korea Korea Growth Trust, The Korea Korea Int'l Trust, The Korea Korea Smaller Companies Trust Korea Korea Trust, The Korea Land Securities PLC United Kingdom Lend Lease Corp. Ltd. Australia Malacca Fund Cayman Islands Malacha Fund Spain? Malaysia Equity Fund Malaysia Manila Fund Philippines New India Fund, The India Odin Mining & Investment Company Ltd. Oporto Growth Fund, The Portugal *Pacific Assets Trust, PLC United Kingdom *Rothschild Holdings United Kingdom Seoul Int'l Trust, The Korea Seoul Trust Korea *Siam Fund Cayman Islands Siam Fund Thailand Siam Smaller Companies Fund Thailand Southvaal Holdings, Ltd. Taipei Fund Taiwan Taiwan Trust Taiwan II. Entities which are potentially PFICs, but whose status is unclear: Name of PFIC Country of Domicile Aachner und Munchener Beteiligung West Germany ASA Ltd. Aker Mek Versted A/S Norway Brierly Investments United Kingdom CFI Cie Forciere Int'l France CS Holdings Switzerland *Cheung Kong Holdings Hong Kong Cie Compagnie Industrille France Compagnie du Midi France Constantia Industrie Australia Corporation Financial Alba Spain - 4 - Dampskip Svenborg Denmark - 5 - Douglas Holdings Australia Erste Allegmeine Ver Australia Hitachi Credit Corp. Japan Hong Kong Realty Trust Hong Kong Hong Kong Realty & Trust Co. Ltd. Hong Kong Immobiliare Metanopoli Italy Impala Plantinum Holdings Australia MEPC Plc United Kingdom MIM Holding Hong Kong *Mediobanca Italy Middle Witwatersrand (Western Areas) Ltd. Minorco Mitsubishi Real

Estate Japan Mitsui Real Estate Development Japan Munchener Ruckversicherung West Germany Nippon Fire and Marine Japan Ofp-Omnimum Fin Paris France Orient Leasing Japan *Pacific Assets Trust, PLC United Kingdom Pagurian Ltd Canada Parkway Holdings Ltd. Singapore Pohjola Class A Finland Riunione Adriatica di Sicurta Italy *Rothschild Holdings United Kingdom Royale Belge Belgium Schweizerische Bankgesellschaft Switzerland Schweizerische Bankverein Switzerland Schweizerische Ruckversichereung Switzerland Sefimeg France *Siam Fund Cayman Islands Simco Union Pour L'Habitation France Tractors Malaysia Uncertain Victoria Lebens-Versicherung West Germany Westfield Trust Units Australia World Int'l Holdings Hong Kong Zurich Versicherung West Germany III. Entities which were suspected of being, but were determined not to be, PFICs: Name of Entity Country of Domicile Allianz West Germany Arab Malaysian First Property Trust Malaysia Bangkok Investments Thailand Bell Group Ltd Australia Bet Plc United Kingdom Brazil Fund Brazil British Land United Kingdom Btr Plc United Kingdom - 6 - CSR Ltd. Australia - 7 - Cannon Street Investments Japan Chargeurs SA France Chile Fund, The Chile Cie Financiere de Paribas France Credit Financier de France France Cross Harbour Tunnel Hong Kong Daily Mail & General Trust 'A' United Kingdom Daito Trust Construction Co., Ltd. Japan Daiwa Securities Japan Fimpar di Risparmio Italy First Malaysian Property Trust Malaysia First Philippine Fund Philippines Fletcher Challenge Holdings Australia Hanson Trust Plc United Kingdom Hawker Siddeby Group PLC United Kingdom Hutchinson Whampoa Ltd Hong Kong IFIL Italy IN/COM France ITI Sociedade de Investmentos Turistico Portugal India Growth Fund India Kanko Japan Korea Fund, The Korea Malaysian Smaller Company Fund Malaysia *Mediobanca Italy Mexico Fund, The Mexico Meyer Int'l United Kingdom Miramar Hotel & Investment Co. Hong Kong Mitsubishi Trust & Banking Japan Nikko Securities Japan Nippon Shinpan Co. Ltd. Japan Nomura Securities Japan P.T. Proctor & Gamble Investments Indonesia Paliburg International Holdings (Formerly Paliburg Investments) Hong Kong Pearson United Kingdom Preussag West Germany Portugal Fund Portugal R.O.C. Taiwan Fund Taiwan SG Wartburg Group United Kingdom Sonae Investments Portugal Sopaf Italy Suez Cie Financiere France Sun Hung Kai Prop Ltd. Hong Kong Swire Pacific Ltd Hong Kong Taiwan Fund Taiwan Yamaichi Securities Japan Yasuda Trust Japan - 8 - Please continue to provide us with any further information which you obtain on entities which are or may be PFICs. The Institute will update this memorandum periodically as more informtion is received from members. David J. Mangefrida, Jr. Assistant General Counsel