# **Gulf Coast Ultra Deep Royalty Trust**

# 2023

**Federal Income Tax Information** 

#### FEDERAL INCOME TAX INFORMATION

This booklet provides 2023 tax information which will allow Trust Unit Holders to determine their pro rata share of deductions attributable to their investment in the Gulf Coast Ultra Deep Royalty Trust (the "Trust"). Each Trust Unit Holder is encouraged to read the entire booklet very carefully. The material herein is not intended and should not be construed as professional tax or legal advice. Each Trust Unit Holder should consult the Trust Unit Holder's own tax advisor regarding all tax compliance matters relating to the Units.

### Instructions for Schedules A, B, C, and D of this Booklet

#### Schedule A

For Trust Unit Holders who file income tax returns on the basis of the calendar year and the cash method during 2023, the Trustee has prepared Schedule A as an **EXAMPLE** which summarizes the distributable items required to prepare 2023 tax returns as if the Trust Unit Holder had held 100 Units during all of 2023.

#### Schedule B

Schedule B summarizes the distributable items on a <u>one</u> Unit basis. In accordance with the Trust Agreement, deductions for each quarter are deemed to be realized on the Quarterly Record Date for that quarter and are allocated to the Trust Unit Holders of record on that date. Therefore, Schedule B is prepared on a quarterly basis. Each Trust Unit Holder using Schedule B should compute his tax information by using the relevant information for each quarter for which he was a Trust Unit Holder of record. Then the results of all appropriate quarters should be combined.

#### Schedule C

Schedule C should be used by all Unit Holders to compute depletion. Calendar year Unit Holders who acquired their Units as part of the Agreement and Plan of Merger between Freeport-McMoRan Inc. ("FCX") and McMoRan Exploration Co. ("MMR") and continue to own those Units should use Schedule C, Part I. Schedule C Part 1 should also be used for the same Unit Holders noted above to calculate deductions attributable to abandonment/worthlessness losses. Other Unit Holders who acquired their Units subsequent to the Agreement and Plan of Merger should use Schedule C, Part II to compute depletion.

#### Schedule D

Unit Holders who acquired their units subsequent to the Agreement and Plan of Merger should use Schedule D on page 9 of this booklet to compute their abandonment/worthlessness loss. Schedule D summarizes deductions attributable to each Unit Holder loss associated with the abandonment or worthlessness of the royalty interest in properties that, based on facts and circumstances, have been abandoned or became worthless for tax purposes. Each Unit Holder using Schedule D should compute the deduction based on when their Units were acquired.

### I. FEDERAL INCOME TAX INFORMATION

### 1. Reporting of Income and Deductions.

(a) Direct Ownership Reporting. Tax counsel to the special committee of the board of directors of McMoran Exploration Co. advised the Trust at the time of formation that, for U.S. federal income tax purposes, in its opinion, the Trust will be treated as a grantor trust and not as an unincorporated business entity. No ruling has been or will be requested from the IRS or another taxing authority. The remainder of the discussion below is based on tax counsel's opinion at the time of formation. As a grantor trust, the Trust will not be subject to tax at the Trust level. Rather, the Trust Unit Holders will be considered to own and receive the Trust's assets and income and will be directly taxable thereon as though no trust were in existence. Under Treasury Regulations, the Trust is classified as a widely-held fixed investment trust. Those Treasury Regulations require the sharing of tax information among trustees and intermediaries that hold a trust interest on behalf of or for the account of a beneficial owner or any representative or agent of a trust interest holder of fixed investment trusts that are classified as widely-held fixed investment trusts. These reporting requirements provide for the dissemination of trust tax

information by the trustee to intermediaries who are ultimately responsible for reporting the investor-specific information through Form 1099 to the investors and the IRS. Every trustee or intermediary that is required to file a Form 1099 for a Trust Unit Holder must furnish a written tax information statement that is in support of the amounts as reported on the applicable Form 1099 to the Trust Unit Holder. Any generic tax information provided by the Trustee of the Trust is intended to be used only to assist Trust Unit Holders in the preparation of their U.S. federal and state income tax returns.

- (b) Taxable Year. Schedules B, C, and D are prepared by calendar quarter on a per Unit basis to permit Trust Unit Holders with taxable years other than a calendar year to obtain their tax information by computing the relevant information for each quarter during their taxable year and then combining the results of each quarter. In accordance with the Trust Agreement, deductions for each quarter are allocated to the Trust Unit Holders of record on the Quarterly Record Date. The taxable year of the Trust is irrelevant.
- (c) *Unit Multiplication*. Because Schedules B, C, and D show only results per Unit, it will be necessary to multiply the results shown by the number of Units owned by the Trust Unit Holder during the applicable period to obtain the amount to be reported on his tax return. Deductions per Unit may be taken directly from the appropriate schedules.
- (d) *Individual Taxpayer.* For Trust Unit Holders who held Units as an investment during 2023 and who file Form 1040, it is suggested that the items of income and deduction for 2023 be reported in the following manner:

ItemForm 1040Royalties ReceivedLine 4, Part I, Schedule EInterest ExpenseLine 13, Part I, Schedule EDepletionLine 18, Part I, Schedule EAdministration ExpenseLine 19, Part I, Schedule EAbandonment or Worthlessness LossLine 19, Part I, Schedule EInterest IncomeLine 1, Part I, Schedule B

Form 1040
Schedule E Items (Royalties less deductions)
Schedule D Items (Capital Gain/Loss)
Form 8960
Line 4a, Part I
Line 5a, Part I

Royalty income is generally considered portfolio income under the passive loss rules enacted by the Tax Reform Act of 1986. Since all income from the Trust is royalty income, this amount, net of depletion, is portfolio income and, subject to certain exceptions and transitional rules, this royalty income cannot be offset by losses from passive businesses.

An individual having adjusted gross income in excess of \$200,000 (or \$250,000 for married taxpayers filing joint returns) is subject to the Net Investment Income Tax of 3.8% on the lesser of such excess or the individual's net investment income. Net investment income generally includes royalty income derived from the Units less deductions allocable to the royalty income (including depletion, interest expense, and administration expense and abandonment/worthlessness deductions). Also, any net gain from the disposition of Units is included in Net Investment Income for this purpose. The Net Investment Income Tax should be computed on Form 8960 for an individual.

See Exhibits I through III for examples of how to report the items listed above.

(e) Widely Held Fixed Investment Trust Information. The Trustee assumes that some Units are held by a middleman; as such term is broadly defined in U.S. Treasury Regulations (and includes custodians, nominees, certain joint owners, and brokers holding an interest for a custodian in street name). Therefore, the Trustee considers the Trust to be a non-mortgage widely held fixed investment trust ("WHFIT") for U.S. federal income tax purposes. The Bank of New York Mellon Trust Company, N.A. ("Trustee"), 601 Travis Street, 16<sup>th</sup> Floor, Houston, Texas 77002, telephone number 1-512-236-6545, is the representative of the Trust that will provide tax information in accordance with applicable U.S. Treasury Regulations governing the information reporting requirements of the Trust as a WHFIT. Notwithstanding the foregoing, the middlemen holding Units on behalf of Trust Unit Holders, and not the Trustee of the Trust, are solely responsible for complying with the information reporting requirements under the U.S. Treasury Regulations with respect to such Units, including the issuance of IRS Forms 1099 and certain written tax statements. Trust Unit Holders whose Units are held by middlemen should consult with such middlemen regarding the information that will be reported to them by the middlemen with respect to the Units.

- 2. Computation of Depletion. The Unit holder should ordinarily compute both percentage depletion and cost depletion from each property and claim the larger amount as a deduction on his income tax return. The Trustee and its independent accountants have estimated that percentage depletion for January through December 2023, will not exceed cost depletion. As a result, unit holders will not need to compute percentage depletion for 2023.
  - (a) Cost Depletion. Each Unit Holder is entitled to compute cost depletion with respect to his share of royalty income received through the Trust based on his basis in the overriding royalty interest in certain productive oil and gas properties. Unit Holders who acquired their Units as part of the Agreement and Plan of Merger between FCX and MMR and continued to hold those Units through the 4<sup>th</sup> Quarter 2023 Record Date should compute cost depletion using the amount shown on Schedule C, Part I (on a per Unit basis).

All other Unit Holders must compute cost depletion by multiplying their Royalty basis by the depletion percentages listed on Schedule C, Part II, for each quarter for which they were a Unit Holder of record, and then combining the results for each quarter of 2023 that they held the units. Unit Holders who acquired Units after the Agreement and Plan of Merger, will have a Royalty basis equal to the purchase price of those Units. Unit Holders using Schedule C, Part II should compute depletion based on when the units were acquired.

- 3. Sale of Units. The sale, exchange or other disposition of a Unit is treated for federal income tax purposes as the sale of an interest in the underlying property of the Trust. Gain or loss is computed under the usual tax principles as the difference between selling price and adjusted tax basis of a Unit. The adjusted tax basis of a Unit is the original cost or other basis of the Unit reduced by any depletion allowed or allowable and the abandonment/worthlessness deductions allowed. The amount of gain, if any, realized upon the disposition of oil and gas property is treated as ordinary income to the extent of depletion claimed with respect to that property to the extent it reduced the Unit Holder's basis in the Units. The balance of any gain or any loss may be capital gain or loss depending on whether that Unit was held by the Trust Unit Holder as a capital asset, and either long-term or short-term depending on the holding period of the Unit. Capital gain or loss will be long-term if a Unit Holder's holding period for those Units exceeded one year as of the date of sale or exchange. A preferential rate of tax applies to long-term capital gains recognized by individuals, estates and trusts. Capital gain or loss would be reported on Form 1040, Schedule D. Individuals, estates and trusts may also be subject to an additional 3.8% tax on any gain recognized as a result of selling, exchanging or otherwise disposing of a Unit.
- **4. Abandonment or Worthlessness Loss Deduction.** Each Unit Holder is entitled to compute abandonment or worthlessness loss with respect to his share of the Trust based on his basis in the overriding royalty interest in certain oil and gas properties (the "Royalty"). Unit Holders who acquired their Units as part of the Agreement and Plan of Merger between FCX and MMR and continued to hold those Units through the 4<sup>th</sup> Quarter 2023 Record Date should compute the abandonment loss deduction by using the amount shown on Schedule C, Part I (on a per Unit basis).

All other Unit Holders must compute the abandonment loss deduction by multiplying their Royalty basis by the abandonment percentages listed on Schedule D, Part I, for each quarter for which they were a Unit Holder of record, and then combining the results for each quarter of 2023 that they held the units. Unit Holders who acquired Units after the Agreement and Plan of Merger, will have a Royalty basis equal to the purchase price of those Units.

- 5. Reconciliation of Net Income and Cash Distributions Reserve Account. The difference between the per Unit net income for a period and the per Unit cash distributions paid for that period is attributable to adjustments in the Reserve Account. The Reserve Account is increased by expenditures which are not deductible and by increases in the cash reserve established by the Trustees for the payment of future expenditures. The Reserve Account is decreased by the recoupment of capital items and by reductions in previously established cash reserves.
- **6. Foreign Persons**. The federal income taxation of non-resident aliens and foreign corporations is highly complex, and it is recommended that these persons consult their own tax advisors.

### II. STATE INCOME TAX INFORMATION

Trust Unit Holders may have state filing requirements as a result of their ownership of Units. The Trust owns overriding royalty prospects in Louisiana and the Gulf of Mexico. If needed, the apportionment data required to comply with state tax filings is below. Trust Unit Holders should consult their tax advisors concerning state tax compliance matters relating to their ownership of Units.

# Royalty Income & Cost Depletion Sourced by State:

Louisiana - 100.00% Other - 0.00%

# Administrative expense and interest expense Sourced by State:

Louisiana - 100.00% Other - 0.00%

# Abandonment/Worthlessness Loss Deductions Sourced by State:

For Units acquired between	Louisiana	Other
June 3, 2013 to March 31, 2014	100.0000%	0.0000%
April 1, 2014 to December 31, 2014	100.0000%	0.0000%
January 1, 2015 to June 30, 2015	100.0000%	0.0000%
July 1, 2015 to September 30, 2015	100.0000%	0.0000%
October 1, 2015 to December 31, 2015	100.0000%	0.0000%
January 1, 2016 to December 31, 2016	100.0000%	0.0000%
January 1, 2017 to December 31, 2017	100.0000%	0.0000%
January 1, 2018 to December 31, 2018	100.0000%	0.0000%
January 1, 2019 to December 31, 2019	100.0000%	0.0000%
January 1, 2020 to December 31, 2020	100.0000%	0.0000%
January 1, 2021 to December 31, 2021	100.0000%	0.0000%
January 1, 2022 to December 31, 2022	100.0000%	0.0000%
January 1, 2023 to December 31, 2023	100.0000%	0.0000%

The Bank of New York Mellon Trust Company, N.A. Trustee 601 Travis Street, 16<sup>th</sup> Floor Houston, Texas 77002 (512) 236-6545

EIN 46-6448579

TAX INFORMATION FOR THE YEAR 2023

230,172,696 Units Outstanding

# **Schedule A: 100 Unit Holder Calculations**

For Trust Unit Holders Who File Returns On The Calendar Year Basis And The Cash Method

# **EXAMPLE**

The calculations below are based on 100 Units held each record date. (See Schedule B for factors used in the calculations).

Date	Units Held	Trust Royalty Income	Trust Interest Income	Trust Interest Expense	Trust Administration Expense
March 31, 2023	100	\$0.188658	\$0.003828	\$0.000000	\$0.102952
June 30, 2023	100	\$0.015153	\$0.002048	\$0.000000	\$0.083429
September 30, 2023	100	\$0.000000	\$0.000737	\$0.000000	\$0.047109
December 31, 2023	100	\$0.000000	\$0.000281	\$0.000000	\$0.000000
Totals		\$0.203711	\$0.006893	\$0.000000	\$0.233490
		Line 4,	Line 1,	Line 13,	Line 19,
		Part I,	Part I,	Part I,	Part I,
		Schedule E	Schedule B	Schedule E	Schedule E

### **Reconciliation Of Income And Cash Distribution**

### INCOME:

Partnership Income (Royalties)	\$0.20
Trust Interest Income	0.01
Less: Trust Interest Expense	0.00
Less: Trust Administration Expense	(0.23)
DECREASE (INCREASE) IN RESERVE*	0.11
TOTAL (Equals Cash Distribution)**	\$0.09

<sup>\*</sup> Increase or decrease in the reserve account is shown for information purposes only.

EIN 46-6448579

### TAX INFORMATION FOR THE YEAR 2023

230,172,696 Units Outstanding

# **Schedule B: One Unit Factors**

For Trust Unit Holders Who File Returns On The Calendar Year Basis And The Cash Method

# **EXAMPLE**

Multiply amounts per Unit shown below by the number of Units owned on each record date. Combine the results and report where indicated on Form 1040.

(See examples on page 10 through 12.)

Date	Partnership Income (Royalties)	Trust Interest Income	Trust Interest Expense	Trust Administration Expense
March 31, 2023	\$0.001887	\$0.000038	\$0.000000	\$0.001030
June 30, 2023	\$0.000151	\$0.000020	\$0.000000	\$0.000834
September 30, 2023	\$0.000000	\$0.000007	\$0.000000	\$0.000471
December 31, 2023	\$0.000000	\$0.000003	\$0.000000	\$0.000000
Totals if held the entire				
year	\$0.002037	\$0.000069	\$0.000000	\$0.002335
	Line 4, Part I, Schedule E	Line 1, Part I, Schedule B	Line 13, Part I, Schedule E	Line 19, Part I, Schedule E

# **Reconciliation Of Income And Cash Distribution**

#### INCOME:

\$0.002037
0.000069
0.000000
(0.002335)
0.001086
\$0.000857

<sup>\*</sup> Increase or decrease in the reserve account is shown for information purposes only.

EIN 46-6448579

# TAX INFORMATION FOR THE YEAR 2023

230,172,696 Units Outstanding

# Schedule C: Depletion and Abandonment/Worthlessness Loss Deduction Per Unit

See page 3 for instructions on the computation of depletion.

### PART I

Depletion: \$ 0.007950 per Unit Line 18, Part I, Schedule E Abandonment Loss: \$ 0.000000 per Unit Line 19, Part I, Schedule E

# TAX BASIS PER UNIT

Gulf Coast Ultra Deep Royalty Trust unit 6-3-13	\$2.047700
Depletion Year 2013	0.000000
Royalty Basis 1-1-14	\$ 2.047700
Depletion Year 2014	0.000000
Royalty Basis 1-1-15	\$ 2.047700
Depletion Year 2015	(0.005668)
Abandonment or Worthlessness Loss Year 2015	(1.430761)
Royalty Basis 1-1-16	\$ 0.611271
Depletion Year 2016	(0.016765)
Abandonment or Worthlessness Loss Year 2016	(0.390997)
Royalty Basis 1-1-17	\$ 0.203510
Depletion Year 2017	(0.009838)
Abandonment or Worthlessness Loss Year 2017	(0.079736)
Royalty Basis 1-1-18	\$ 0.113936
Depletion Year 2018	(0.008544)
Abandonment or Worthlessness Loss Year 2018	(0.004729)
Royalty Basis 1-1-19	\$ 0.100663
Depletion Year 2019	(0.004805)
Abandonment or Worthlessness Loss Year 2019	(0.000157)
Royalty Basis 1-1-20	\$ 0.095700
Depletion Year 2020	(0.004105)
Abandonment or Worthlessness Loss Year 2020	(0.000000)
Royalty Basis 1-1-21	\$ 0.091595
Depletion Year 2021	(0.002617)
Abandonment or Worthlessness Loss Year 2021	(0.078651)
Royalty Basis 1-1-22	\$ 0.010327
Depletion Year 2022	(0.002377)
Abandonment or Worthlessness Loss Year 2022	(0.000000)
Royalty Basis 1-1-23	\$ 0.007950
Depletion Year 2023	(0.007950)
Abandonment or Worthlessness Loss Year 2023	(0.000000)
Royalty Basis 1-1-24	\$ 0.000000

EIN 46-6448579 TAX INFORMATION FOR THE YEAR 2023

230,172,696 Units Outstanding

# **Schedule C: Depletion**

See page 3 for instructions on the computation of depletion.

### **PART II**

Cost Depletion for Calendar Year individuals who acquired their Units subsequent to the initial conversion of MMR common stock for \$14.75 and 1.15 royalty units of the Trust per MMR share on June 3, 2013.

Total
Depletion As
A Percent of
Royalty Basis
if you held units

if you held units the entire year

For Units acquired between	Mar. 31, 2023	Jun. 30, 2023	Sept. 30, 2023	Dec. 31, 2023	year
June 3, 2013 to March 31, 2014	85.9588%	14.0412%	0.0000%	0.0000%	100.0000%
April 1, 2014 to December 31, 2014	85.9588%	14.0412%	0.0000%	0.0000%	100.0000%
January 1, 2015 to June 30, 2015	85.9588%	14.0412%	0.0000%	0.0000%	100.0000%
July 1, 2015 to September 30, 2015	85.9588%	14.0412%	0.0000%	0.0000%	100.0000%
October 1, 2015 to December 31, 2015	85.9588%	14.0412%	0.0000%	0.0000%	100.0000%
January 1, 2016 to December 31, 2016	85.9588%	14.0412%	0.0000%	0.0000%	100.0000%
January 1, 2017 to December 31, 2017	85.9588%	14.0412%	0.0000%	0.0000%	100.0000%
January 1, 2018 to December 31, 2018	85.9588%	14.0412%	0.0000%	0.0000%	100.0000%
January 1, 2019 to December 31, 2019	85.9588%	14.0412%	0.0000%	0.0000%	100.0000%
January 1, 2020 to December 31, 2020	85.9588%	14.0412%	0.0000%	0.0000%	100.0000%
January 1, 2021 to December 31, 2021	85.9588%	14.0412%	0.0000%	0.0000%	100.0000%
January 1, 2022 to December 31, 2022	85.9588%	14.0412%	0.0000%	0.0000%	100.0000%
January 1, 2023 to December 31, 2023	85.9588%	14.0412%	0.0000%	0.0000%	100.0000%

EIN 46-6448579 TAX INFORMATION FOR THE YEAR 2023

230,172,696 Units Outstanding

# **Schedule D: Abandonment or Worthlessness Loss Deduction**

See page 3 for instructions on the computation of the abandonment or worthlessness loss deduction

# PART I

The abandonment or worthlessness loss deduction for Calendar Year individuals who acquired their Units subsequent to the initial conversion of MMR common stock for \$14.75 and 1.15 royalty units of the Trust per MMR share on June 3, 2013.

Total
Abandonment/
Worthlessness
Loss as % of
Royalty Basis if
you held units
the entire

For Units acquired between	Mar. 31, 2023	Jun. 30, 2023	Sept. 30, 2023	Dec. 31, 2023	year
June 3, 2013 to March 31, 2014	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
April 1, 2014 to December 31, 2014	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
January 1, 2015 to June 30, 2015	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
July 1, 2015 to September 30, 2015	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
October 1, 2015 to December 31, 2015	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
January 1, 2016 to December 31, 2016	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
January 1, 2017 to December 31, 2017	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
January 1, 2018 to December 31, 2018	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
January 1, 2019 to December 31, 2019	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
January 1, 2020 to December 31, 2020	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
January 1, 2021 to December 31, 2021	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
January 1, 2022 to December 31, 2022	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%
January 1, 2023 to December 31, 2023	0.0000%	0.0000%	0.0000%	0.0000%	0.0000%

EIN 46-6448579

# Exhibit I

# Individual Trust Unit Holder's Specific Location of Allowable Deductions on Schedule E

		EDULE E Supplemental Income and Loss n 1040) (From rental real estate, royalties, partnerships, S cornorations, estates, trusts, REMICs, etc.)					OMB No	. 1545-0074						
	(Form										2023			
		nent of the Treasury Revenue Service		Co							formation		Attachm	nent 12
		shown on return								Your soci	Sequence No. 13			
			Income or Loss From Rental Real Estate and Royalties  Note: If you are in the business of renting personal property, use Schedule C. See instructions. If you are an indirental income or loss from Form 4835 on page 2, line 40.  you make any payments in 2023 that would require you to file Form(s) 1099? See instructions								•			
	Part	Note: If yo								re an indi	vidual, rep	ort farm		
		Did you make ar								_	s No			
	1a				operty (street, c								. 🔲 те	s 🗌 No
	A													
	В													
	С													
	1b	Type of Prope (from list below			each rental real ve, report the nu					Fa	ir Rental Days	Person Da	nal Use QJV	
	Α	T	$\dashv$	pers	onal use days. (	Check the Qu	IV box	only	Α					
	В				u meet the requi ified joint ventur				В					
	С			quan	illed Joint Ventur	e. See ilistru	Cuons		С					
		of Property:												
		Single Family R Multi-Family Re			3 Vacation/Sho 4 Commercial	ort-Term Rent	tal	5 Land 6 Roya			Self-Rental Other (descr	ibe)		
Royalty											Properti	es:		
Income	Incom	ne:							Α		В			С
Theome -	3	Rents received					3							
	4	Royalties rece	ved .				4			_				
	Exper						ا ۔ ا			- 1				
	5 6	Advertising				5 6			$\overline{}$					
	7						7			$\overline{}$				
	8	Cleaning and maintenance				8			$\neg$					
	9						9							
	10	Legal and other	r profes	sional	fees		10							
Interest	11	Management t	ees				11							
Expense	12				nks, etc. (see in:		12							
Expense	13						13			_				
	14						14			_				
	15 16						15 16			_				
5	17						17			-				
<b>Depletion</b> —	18				letion		18			$\neg$				
	19				brough 10		19							
	20	Total expense	s. Add li	nes 5 t	hrough 19		20							
	21	Subtract line 2	0 from li	ine 3 (r	rents) and/or 4 (r	royalties). If								
					ions to find out		21							
Administration	22	Deductible rer	tal real	estate	loss after limita	tion, if any,	22	,		,	,	,	,	,
	23a				on line 3 for all				. 1	23a	1			
Expense &					on line 4 for all					23b			1	
Abandonment					on line 12 for a					23c				
Loss	d	Total of all am	ounts re	ported	on line 18 for a	II properties			. [	23d				
					on line 20 for a					23e				
	24				nts shown on lin							. 24		
	25				m line 21 and rer								(	)
	26				I royalty incom nd line 40 on p									
					5. Otherwise, in							. 26		
	For Pa	nerwork Reduct	ion Act N	Votice.	see the senarate	instructions.			Cat No.	1124	41		badula E /E	orm 1040) 2022

EIN 46-6448579

# Exhibit II

# Individual Trust Unit Holder's Specific Location of Interest Income on Schedule B

Interest Income

SCHEDULE E	3	Interest and Ordinary Dividends		OMB No.	1545-0074
(Form 1040)		_		20	23
Department of the Tr Internal Revenue Ser		Attach to Form 1040 or 1040-SR.  Go to www.irs.gov/ScheduleB for instructions and the latest information.		Attachme Sequence	nt ne
Name(s) shown on r		do to www.ns.gov/ocredules for instructions and the latest information.	Your	social securi	
The state of the s				300101	,
Part I	1	List name of payer. If any interest is from a seller-financed mortgage and the		Amo	ount
Interest		buyer used the property as a personal residence, see the instructions and list this			
		interest first. Also, show that buyer's social security number and address:			
See instructions and the					
nstructions for					
Form 1040, line 2b.)					
Note: If you					
received a			١		
Form 1099-INT, Form 1099-OID,			1		
or substitute					
statement from a brokerage firm,					
list the firm's					
name as the payer and enter					
the total interest					
shown on that form					
	2	Add the employee on line 1	2		
	3	Add the amounts on line 1	-		
	•	Attach Form 8815	3		
	4	Subtract line 3 from line 2. Enter the result here and on Form 1040 or 1040-SR, line 2b	4		
	Note:	If line 4 is over \$1,500, you must complete Part III.		Amo	ount
Part II	5	List name of payer:			
Ordinary					
Dividends					
See instructions and the					
Instructions for					
Form 1040, line 3b.)			5		
Note: If you					
received a					
Form 1099-DIV or substitute					
statement from					
a brokerage firm, list the firm's					
name as the					
payer and enter the ordinary			$\vdash$		
dividends shown	6	Add the amounts on line 5. Enter the total here and on Form 1040 or 1040-SR, line 3b	6		
on that form.	Note:	If line 6 is over \$1,500, you must complete Part III.			
Part III		nust complete this part if you (a) had over \$1,500 of taxable interest or ordinary of			d a foreig
Foreign	accou	int; or (c) received a distribution from, or were a grantor of, or a transferor to, a foreign	trust		
Accounts					Yes No
and Trusts	7a	At any time during 2023, did you have a financial interest in or signature authority	over a	financial	
Caution: If		account (such as a bank account, securities account, or brokerage account) locat			
required, failure to file FinCEN Form	)	country? See instructions			
114 may result in		If "Yes," are you required to file FinCEN Form 114, Report of Foreign Bank			
substantial penalties.		Accounts (FBAR), to report that financial interest or signature authority? See Fin6	CEN F	orm 114	
Additionally, you		and its instructions for filing requirements and exceptions to those requirements .			
may be required to file Form 8938.	b	If you are required to file FinCEN Form 114, list the name(s) of the foreign country(			
Statement of		financial account(s) is (are) located:			
Specified Foreign Financial Assets.	8	During 2023, did you receive a distribution from, or were you the grantor of, or t	ranef	ror to c	
See instructions.	0	foreign trust? If "Yes," you may have to file Form 3520. See instructions			

EIN 46-6448579

# **Exhibit III**

# **Individual Trust Unit Holder's Specific Location of Investment Income Items on Form 8960**

	Net Investment Income Tax— Individuals, Estates, and Trusts  Attach to your tax return.  Name(s) shown on your tax return  You  You  You  You  You  You  You  Yo	OMB No. 1545-2227  2023 Attachment Sequence No. 72  ar social security number or EIN
	Part I Investment Income Section 6013(g) election (see instructions)	
	Section 6013(h) election (see instructions)	
Schedule E Items	Regulations section 1.1411-10(g) election (see instructions)	1.1
	1 Taxable interest (see instructions)	. 1
Including Royalty	2 Ordinary dividends (see instructions)	. 2
Income less	3 Annuities (see instructions)	. 3
deductions (see line 21 of Schedule E)	Aa Rental real estate, royalties, partnerships, S corporations, trusts, trades or businesses, etc. (see instructions)	
	b Adjustment for net income or loss derived in the ordinary course of a non-	
	section 1411 trade or business (see instructions)	_
	c Combine lines 4a and 4b	. 4c
Schedule D Items —	5a Net gain or loss from disposition of property (see instructions)	_
Including Capital	b Net gain or loss from disposition of property that is not subject to net	
Gain/Loss	investment income tax (see instructions)	_
Guin, 2000	c Adjustment from disposition of partnership interest or S corporation stock (see	
	instructions)	
	d Combine lines 5a through 5c	. 5d
	6 Adjustments to investment income for certain CFCs and PFICs (see instructions)	. 6
	7 Other modifications to investment income (see instructions)	. 7
	8 Total investment income. Combine lines 1, 2, 3, 4c, 5d, 6, and 7	. 8
	Part II Investment Expenses Allocable to Investment Income and Modifications	
	9a Investment interest expenses (see instructions)	
	b State, local, and foreign income tax (see instructions) 9b	
	c Miscellaneous investment expenses (see instructions) 9c	
	d Add lines 9a, 9b, and 9c	. 9d
	10 Additional modifications (see instructions)	. 10
	11 Total deductions and modifications. Add lines 9d and 10	. 11
	Part III Tax Computation	
	12 Net investment income. Subtract Part II, line 11, from Part I, line 8. Individuals, complete lines 13–17	7.
	Estates and trusts, complete lines 18a-21. If zero or less, enter -0	. 12
	Individuals:	
	13 Modified adjusted gross income (see instructions)	
	14 Threshold based on filing status (see instructions)	
	15 Subtract line 14 from line 13. If zero or less, enter -0	
	16 Enter the smaller of line 12 or line 15	. 16
	17 Net investment income tax for individuals. Multiply line 16 by 3.8% (0.038). Enter here and includ	e
	on your tax return (see instructions)	. 17
	Estates and Trusts:	
	18a Net investment income (line 12 above)	
	b Deductions for distributions of net investment income and charitable deductions (see instructions)	
	c Undistributed net investment income. Subtract line 18b from line 18a (see instructions). If zero or less, enter -0	
	19a Adjusted gross income (see instructions)	
	b Highest tax bracket for estates and trusts for the year (see instructions) 19b	$\neg$
	c Subtract line 19b from line 19a. If zero or less, enter -0	
	20 Enter the smaller of line 18c or line 19c	. 20
	21 Net investment income tax for estates and trusts. Multiply line 20 by 3.8% (0.038). Enter here an	
	include on your tax return (see instructions)	. 21