

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶
Internal Revenue Code Sections 301(c) and 316(c)

18 Can any resulting loss be recognized? ▶ N/A

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶
The return of capital in Item 15 above is an estimate based on the most current and accurate estimated earnings and profits information available at the time this Form is published for the reportable tax year 2021. The Company will report an updated Form 8937 in early January 2022 and upon the filing of the 2021 federal income tax return, if it determines that the amount of distributions treated as a return of capital with respect to each share of Common Stock changes. The above information does not constitute tax advice. It is recommended that stockholders consult with their own tax advisors regarding the income tax consequences of amounts that may be revised at a later date.

Sign Here
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.
Signature ▶ John Samuels Date ▶ 11/3/2021
Print your name ▶ John samuels Title ▶ SMD

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.