

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 DATES OF THE DISTRIBUTIONS IDENTIFIED IN PART II, LINE 15.

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 ▶ Liou Guo Date ▶ 3/11/2026
DocuSigned by:
6DC8EDE2E34E46E...
Print your name ▶ LIU GUO Title ▶ SENIOR VP - DOMESTIC TAX

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	<u>ERIC TELLEKAMP</u>	<u>[Signature]</u>	<u>03/11/2026</u>		<u>P01501624</u>
	Firm's name ▶ <u>BDO USA</u>	Firm's EIN ▶ <u>13-5381590</u>		Phone no. <u>703-893-0600</u>	
	Firm's address ▶ <u>8401 GREENSBORO DRIVE, #800 MCLEAN, VA 22102</u>				

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