

Part II Organizational Action *(continued)*

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

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 ▶ _____

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 ▶  Date ▶ 1/8/2026

Paid Preparer Use Only	Print your name ▶ <u>JAVIER BITAR</u>	Title ▶ <u>CHIEF FINANCIAL OFFICER</u>
	Print/Type preparer's name <u>JASON LIN</u>	Preparer's signature 
	Firm's name ▶ <u>ERNST & YOUNG U.S. LLP</u>	Date <u>1/8/2026</u>
	Firm's address ▶ <u>725 SOUTH FIGUEROA STREET, LOS ANGELES, CA 90017</u>	Check <input type="checkbox"/> if self-employed PTIN <u>P01427491</u>
	Firm's EIN ▶ <u>34-6565596</u>	Phone no. <u>213-977-3200</u>