

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 316 - Dividend defined

Section 317 - Property defined

Section 301 - Distribution of property

Section 312 - Effect on earnings and profits

Reg. Section 1.1502-33

Other section further defining adjustments to E&P that are not contained in section 312

18 Can any resulting loss be recognized? ▶ The distribution would not create a loss. The reduction to shareholders' basis may affect the amount of gain or loss realized on the future sale of shares.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The adjustment to basis would be taken into account in the tax year of the shareholder during which the distribution was received (e.g. 2024 for calendar year taxpayers).

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 ▶ Josh Kerbo Date ▶ 11/21/2024

Print your name ▶ Josh Kerbo Title ▶ VP, Controller

Paid Preparer Use Only

Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
Firm's name ▶ <u>Deloitte Tax LLP</u>			Firm's EIN ▶ <u>86-1065772</u>	
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