



**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, 302, AND 1001 OF THE CODE.


**18** Can any resulting loss be recognized? ► THE REDEMPTION MAY RESULT IN A RECOGNIZABLE LOSS BY A SHAREHOLDER FOR U.S. FEDERAL INCOME TAX PURPOSES IF THE SHAREHOLDER'S ADJUSTED BASIS IN THE REDEEMED PREFERENCE SHARES EXCEEDS THE NET PROCEEDS RECEIVED BY THE SHAREHOLDER IN THE REDEMPTION, PROVIDED THAT THE SHAREHOLDER IS ELIGIBLE FOR SALE OR EXCHANGE TREATMENT AS DEFINED IN SECTION 302 OF THE CODE. IF A SHAREHOLDER FAILS TO SATISFY THE REQUIREMENTS OF SECTION 302(b) OF THE CODE, THEN SUCH SHAREHOLDER MAY NOT RECOGNIZE A LOSS ON THE REDEMPTION FOR US FEDERAL INCOME TAX PURPOSES.

**19** Provide any other information necessary to implement the adjustment, such as the reportable tax year ► THE TAXABLE YEAR FOR THE REDEMPTION IS 2023 FOR SHAREHOLDERS REPORTING ON A CALENDAR YEAR BASIS. FOR SHAREHOLDERS REPORTING TAXABLE INCOME ON A BASIS OTHER THAN THE CALENDAR YEAR, THE PROPER TAXABLE YEAR INCLUDES 12/28/2023.

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 ► 02/27/24

Print your name ► ACHILLEAS TASIOULAS Title ► CHIEF FINANCIAL OFFICER

<b>Paid Preparer Use Only</b>	Print/Type preparer's name <u>NICHOLAS VENTEN</u>	Preparer's signature 	Date <u>01/15/2024</u>	Check <input type="checkbox"/> if self-employed	PTIN <u>P01588572</u>
	Firm's name ► <u>ERNST &amp; YOUNG US LLP</u>	Firm's EIN ► <u>34-6565596</u>		Phone no. <u>516-336-0100</u>	
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