

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ Sections 305(a) and 307(a).

18 Can any resulting loss be recognized? ▶ No loss may be recognized in the Distribution.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ The basis adjustments should be taken into account in the tax year of the shareholder during which the Distribution occurred (i.e., 2021 for a calendar-year taxpayer).

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 ▶ *Jason J Doyle* Date ▶ 05/11/2021

Print your name ▶ JASON DOYLE Title ▶ CFO

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	EDDIE BOZEMAN	<i>Eddie Bozeman</i>	5/7/21		P00742238
	Firm's name ▶ DELOITTE TAX LLP	Firm's EIN ▶ 86-1065772		Phone no. 404-220-1500	
Firm's address ▶ 191 PEACHTREE STREET NE, STE 2000, ATLANTA, GA 30303					