

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 311 (a).

Multiple horizontal lines for listing applicable Internal Revenue Code sections.

18 Can any resulting loss be recognized? ▶ No.

Multiple horizontal lines for providing information regarding resulting loss recognition.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ This action is effective on the date of the distribution identified above.

Multiple horizontal lines for providing other information necessary to implement the adjustment.

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 ▶ *April M. Ehrenbeit* Date ▶ 1/21/2025

Print your name ▶ April M. Ehrenbeit Title ▶ Senior Director of Tax

Paid Preparer Use Only

Print/Type preparer's name ERIC SIEMBORSKI	Preparer's signature <i>Eric Siemborski</i>	Date 1/18/2025	Check <input type="checkbox"/> if self-employed	PTIN P01593611
Firm's name ▶ PWC US Tax LLP			Firm's EIN ▶ 92-0460586	
Firm's address ▶ One North Wacker, Chicago, IL 60606			Phone no. 312-298-2000	

The information contained herein is being provided pursuant to the requirements of Section 6045B of the Internal Revenue Code of 1986, as amended. The information in this document does not constitute tax advice and should not be construed to take into account any shareholder's specific circumstances. Holders and nominees should consult their own tax advisors regarding the particular tax consequences of the organizational action (as described in this document) to them, including the applicability and effect of all U.S. federal, state, and local and foreign tax laws.