

Part II Organizational Action (continued)

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

1) January 15, 2020 Distributions - Internal Revenue Code Section 301(c) and 316(a).

18 Can any resulting loss be recognized? ▶ _____

1) January 15, 2020 Distributions - No; non-taxable treatment governed by IRC Section 301(c)(2).

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ _____

These actions are effective on the date(s) of the distributions identified above.

Sign Here

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.

Signature ▶ *Mallika Sinha* Date ▶ _____

Print your name ▶ Mallika Sinha Title ▶ CFO

Paid Preparer Use Only

Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
Stephen J. Bertonaschi	<i>[Signature]</i>	2/8/2021		P00747384
Firm's name ▶ FTI Consulting, Inc.	Firm's EIN ▶ 52-1261113		Phone no. 973-852-8100	
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