

Part II Organizational Action (continued)

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

18 Can any resulting loss be recognized? ▶ See attached.

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

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 ▶ <i>William P. Van Sadlers</i>	Date ▶ 9/16/2024		
Paid Preparer Use Only	Print your name ▶ William P. Van Sadlers	Title ▶ SVP & Deputy General Counsel - Corporate Taxes		
	Print/Type preparer's name Kathy Zhang	Preparer's signature <i>Kathy Zhang</i>	Date 9/16/2024	Check <input type="checkbox"/> if self-employed PTIN P03140025
	Firm's name ▶ Cleary Gottlieb Steen & Hamilton LLP	Firm's EIN ▶ 13-5599083		
	Firm's address ▶ One Liberty Plaza, New York, NY 10006	Phone no. (212)225-2000		