

Part II Organizational Action (continued)

17 List the applicable Internal Revenue Code section(s) and subsection(s) upon which the tax treatment is based ▶ The company determined the characterization of the distribution under Section 301, and the calculation of earnings & profits under Section 312.

18 Can any resulting loss be recognized? ▶ N/A

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ This is applicable for the company's tax year ended 11/30/2021.

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 ▶ Michael Gutch Date ▶ 1/15/2022

Print your name ▶ MICHAEL GUTCH Title ▶ GLOBAL HEAD OF TAX

Paid Preparer Use Only	Print/Type preparer's name	Preparer's signature	Date	Check <input type="checkbox"/> if self-employed	PTIN
	<u>KATARZYNA MARGIEL</u>	<u>[Signature]</u>	<u>1/18/2022</u>		<u>P01454008</u>
	Firm's name ▶ <u>KPMG LLP</u>	Firm's address ▶ <u>345 PARK AVENUE, NEW YORK, NY 10154-0102</u>		Firm's EIN ▶	<u>13-5565207</u>
				Phone no.	<u>212-758-9700</u>