

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 301(c)(2), 316, 317, 312.

18 Can any resulting loss be recognized? ▶ THIS DISTRIBUTION WOULD NOT CREATE A LOSS.

19 Provide any other information necessary to implement the adjustment, such as the reportable tax year ▶ THE ADJUSTMENT TO BASIS WOULD BE TAKEN INTO ACCOUNT IN THE TAX YEAR OF THE SHAREHOLDER DURING WHICH THE DISTRIBUTION WAS RECEIVED (E.G., 2019 CALENDAR YEAR TAXPAYERS).

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 ▶  Date ▶ 14/04/2020
Print your name ▶ TRACY L. WHITMORE Title ▶ VICE PRESIDENT OF TAX & CORPORATE AFFAIRS

Paid Preparer Use Only	Print/Type preparer's name <u>DIANA C. ESTRADA</u>	Preparer's signature 	Date <u>4/13/2020</u>	Check <input type="checkbox"/> if self-employed	PTIN <u>P01511949</u>
	Firm's name ▶ <u>DELOITTE LLP</u>	Firm's EIN ▶ <u>98-0115552</u>		Phone no. <u>403-267-1700</u>	
	Firm's address ▶ <u>700-850 2ND ST. SW, CALGARY, AB CANADA T2P 0R8</u>				