



TAXPAYER NAME: _____ TAXPAYER FEIN: _____ FOR THE TAX PERIOD _____, 20 ____ through _____, 20 ____

| Recipient related member who received interest/intangible income from the taxpayer: | Related Member 1 | Related Member 2 | Related Member 3 | Related Member 4 |
|---|------------------|------------------|------------------|------------------|
| 1 a. Recipient related member FEIN..... | 1a ● 11-1111111 | ● 22-2222222 | ● 33-3333333 | ● 44-4444444 |
| b. Recipient related member name..... | 1b ● BCA Corp | ● CAB Corp | ● DEF Corp | ● EFG Corp |
| 2 List the intangible expense amounts paid to the recipient related member..... | 2 ● 50,000,000 | ● 0 | ● 0 | ● 0 |
| 3 List the interest expense amounts paid to the recipient related member..... | 3 ● 0 | ● 10,000,000 | ● 20,000,000 | ● 4,000,000 |
| 4 Total intangible/interest expenses paid (total lines 2 and 3)..... | 4 ● 50,000,000 | ● 10,000,000 | ● 20,000,000 | ● 4,000,000 |

To determine the exempt amount of intangible/interest expense, complete the applicable section(s) below.

| | | | | |
|---|------------------|----------------------|--------------|-------------|
| 5 Exemption related to §40-18-35(b)(1): | | | | |
| a. Jurisdiction(s) where recipient related member income is "subject to tax" and not allocated. | 5a ● | ● GA, PA, TX, FL, LA | ● CA, MS, TN | ● |
| b. Amount of Interest/Intangible subject to apportionment in jurisdiction(s)..... | 5b ● 0 | ● 10,000,000 | ● 19,500,000 | ● 0 |
| c. Recipient related member's total apportionment percentage in the above jurisdiction(s)..... | 5c ● 0 % | ● 30 % | ● 15 % | ● 0 % |
| d. Interest/Intangible apportioned to jurisdictions (multiply Line 5b by Line 5c)..... | 5d ● 0 | ● 3,000,000 | ● 2,925,000 | ● 0 |
| e. Intangible/Interest income allocated to jurisdiction(s)..... | 5e ● 0 | ● 0 | ● 500,000 | ● 0 |
| f. Add Line 5d and Line 5e..... | 5f ● 0 | ● 3,000,000 | ● 3,425,000 | ● 0 |
| 6 Exemption related to §40-18-35(b)(2) and §40-18-35(b)(4) – Amount of Line 4 expense not added back..... | 6 ● 0 | ● 0 | ● 0 | ● 4,000,000 |
| 7 Exemption related to §40-18-35(b)(3) – Amount of Line 4 expense not added back..... | 7 ● 50,000,000 | ● 0 | ● 20,000,000 | ● 0 |
| 8 Recipient related member receipts by category: | | | | |
| a. Intangible receipts..... | 8a ● 0 | ● 0 | ● 0 | ● 0 |
| b. Interest receipts..... | 8b ● 50,000,000 | ● 0 | ● 30,000,000 | ● 0 |
| 9 a. ● | 9a ● 0 | ● 0 | ● 2,000,000 | ● 0 |
| b. ● | 9b ● 60,000,000 | ● 0 | ● 1,000,000 | ● 0 |
| c. ● | 9c ● 250,000,000 | ● 0 | ● 250,000 | ● 0 |
| d. ● | 9d ● 1,000,000 | ● 0 | ● 0 | ● 0 |
| 10 a. If either Lines 8a or 8b are greater than Lines 9a, 9b, 9c or 9d, enter zero..... | 10a ● 0 | ● 0 | ● 0 | ● 0 |
| b. If Lines 9a, 9b, 9c or 9d are greater than Lines 8a or 8b, enter amount from Line 7..... | 10b ● 50,000,000 | ● 0 | ● 0 | ● 0 |
| 11 Exempt Amount. Enter the greater of Lines 5f, 6, 10a or 10b..... | 11 ● 50,000,000 | ● 3,000,000 | ● 3,425,000 | ● 4,000,000 |
| 12 Interest Expense Disallowed per IRC 163(j) (allocated pro rata see instructions)..... | 12 ● 0 | ● 3,529,416 | ● 7,058,820 | ● 1,411,764 |
| 12a Exempt amount of Disallowed IRC 163(j) (Line 11 divided by Line 4, multiplied by Line 12)..... | 12a ● 0 | ● 1,058,825 | ● 1,208,823 | ● 1,411,764 |
| 13 Section 163(j) Carryforward..... | 13 ● | ● 800,000 | ● | ● 550,000 |
| 14 Total Intangible/Interest expenses paid to all related members less total disallowed IRC 163(j) Interest (sum of all Line 4 for all related members minus all Line 12 for all related members plus all Line 13 for all related members)..... | 14 ● 73,350,000 | | | |
| 15 Total Exempt Amount. (Line 11 minus Line 12a for all related members from all pages)... | 15 ● 56,745,588 | | | |

In order to qualify for the exemption presented in §40-18-35(b)(3) and §40-18-24(e), Line 10b must be greater than zero and an informed corporate officer must sign Schedule AB, executed under penalty of perjury. This signature denotes that tax avoidance was not a principal motivating factor with respect to the transaction(s) giving rise to the related member's interest/intangible expenses and costs.

Signature Corporate Officer
Title CFO Date 4/15/24